



March 8, 2021

Ms. Krista Fregoso
Air Pollution Specialist
Strategic Planning and Development (SPD) Section
California Air Resources Board
1001 I Street
Sacramento, CA 95814

via email to phuong.ho@arb.ca.gov

Dear Ms. Fregoso:

We are writing on behalf of the RV Industry Association (RVIA), the National Association of RV Parks and Campgrounds (ARVC) and the CampCalNOW RV Park and Campground Alliance. RVIA is the national trade association representing the diverse manufacturing businesses which manufacture more than 98 percent of all recreational vehicles (RV) produced in the United States — including motorhomes, travel trailers, fifth-wheel travel trailers, folding camping trailers, and truck campers. RVIA is the unifying force for safety and professionalism within the RV industry, working with federal and state policymakers to promote and protect the RV industry and its members.

ARVC, a leader in the outdoor hospitality industry, is the only national association dedicated to representing the interests and needs of private RV parks and campgrounds in the US and Canada. It is deeply committed to providing its nearly 3,000 members exclusive access to continuing education, networking, business and marketing tools, member-only benefits and discounts, and advocacy at the local, state and national levels.

CampCalNOW is a leading association for California RV park and campground owners. Throughout its 47-year history, it has provided its members the tools, resources, and programs they need to be successful, while promoting growth and development of the outdoor hospitality industry. Through extensive legislative advocacy, CampCalNOW has successfully protected its members so they could continue to provide a positive RV and camping experience to the camping consumer.

We thank the California Air Resources Board (CARB) for holding this series of Heavy-Duty Inspection/Maintenance Program Workgroup Meetings on Proposed Regulatory Concepts. This proposed regulatory initiative could have a large negative impact on motorhome usage and visitations in California. We also appreciate that CARB recognizes that this initiative could have such an impact and has proposed a 3-day temporary exemption plan. However, the 3-day temporary stay proposal is insufficient and unworkable for motorhome owners.

The RV industry has a very large economic impact in California, some \$8.8 billion annually, in all segments of the industry, which includes RV manufacturers and suppliers, RV dealers and service centers, and RV parks and campgrounds. It provides nearly 47,000 jobs in more than 3,000 separate businesses, paying more than \$2.9 billion in wages and generating more than \$1.1 billion in tax revenues to the state. Manufacturing represents \$3.9 billion in annual economic impact, while sales and service provide \$2.4 billion and RV parks and travel add another \$2.5 billion.

In 2020, a total of 30,994 RVs were shipped to California, of which 5,209 were motorhomes. These statistics make California the second largest overall market, behind only Texas, and the second largest motorhome market, trailing only Florida. Of the 5,209 motorhomes shipped to California, just over 35 percent were non-gasoline powered, a total of 1,827 motorhomes.

It is critical to note that diesel motorhomes are used in California by residents AND by out-of-state residents. California has many natural and cultural attributes that attract RVers:

- 9 National parks
- More than 30 amusement parks
- 840 miles of coastline
- Beaches
- Mountains, including the Sierra Nevada range
- Deserts
- Lakes
- Wineries
- Sporting events and stadiums
- Other events

Motorhome visits by out-of-state residents to California are planned well in advance to take in the attractions that the state offers and typically far exceed three days. The visitors also spend significant amounts of money in California on campground fees, food, fuel, entertainment and other purchases. The RV parks and campgrounds that host motorhome visits rely on these out-of-staters coming in, as do the many complementary businesses that are near the campgrounds and RV parks. It is important to note that many of these businesses are in the more rural areas of the state.

The HD I/M initiative as currently envisioned will have a negative impact on the RV industry in California as out-of-state motorhome owners will decide to go to other states, such as Arizona, Nevada, Oregon, Washington, New Mexico, Utah, Idaho or Montana. When these owners visit other states instead of California, the money they spend in those states will not benefit California.

Enforcement of the HD I/M initiative for diesel motorhomes registered and residing in California would seem relatively straightforward, as the annual inspection could be tied to registration

renewals. However, enforcing this regulation against out-of-state motorhome owners would be very problematic, as the overwhelming majority of out-of-state owners would likely be unaware of the rule to begin with.

The initiative proposes a three-day temporary vehicle exemption, but this alone will likely cause diesel motorhome owners to go elsewhere, as they will figure that the hassle of applying for a pass will not be worth it when you can go someplace else. Moreover, there will presumably be an administrative fee for requesting and receiving the pass; this, too, will likely cause people to go elsewhere. In addition, the fact that an owner can only receive one three-day temporary exemption per year will be harmful as it could further deter out-of-state motorhome owners from coming into California a second time.

A rule impacting diesel motorhomes could also lead to more California residents opting against buying motorhomes and instead buying towable RVs, such as larger travel trailer and fifth-wheel trailers, which are not affected by the rule. These residents will in turn purchase pickups larger than they might have otherwise purchased for daily use, which will in turn have a negative impact on emissions.

Testing of out-of-state diesel motorhomes is also contemplated in this initiative. Again, this requirement alone will cause people to go elsewhere. Presumably, there would be a cost to test and get certified for operation in California; this will cause people to say, “no thanks, I’ll go somewhere else.”

It is clear in reading the legislation from 2019 that establishes the need for CARB to be undertaking this initiative that diesel motorhomes were not the intended subject to be regulated. The legislation does allow CARB to establish full or partial exemptions from the requirements of this section for categories of vehicles it determines on the basis of substantial evidence that the economic costs of compliance substantially outweigh the benefits of compliance, including public health benefits. We believe that non-gasoline powered motorhomes are such a category.

We believe that subjecting owners of out-of-state non-gasoline motorhomes to this regulation will indeed have negative economic consequences that substantially outweigh the benefits of compliance. Many of the economic consequences we are discussing here, however, will be difficult, if not impossible, to quantify. We do not know how to value the opportunity cost of not being able to explore Yosemite, not being able to view the Pacific Ocean from Highway 1, not being able to travel to Lake Tahoe for hiking, or not being able to drive to Los Angeles to see a game at Dodger Stadium. These are some of the things motorhome owners do when they travel to California.

Setting aside the cost impacts that may be impossible to quantify, we know that there will be substantial impacts to campground operators and the many mom-and-pop businesses that surround them. We know that bikes and boats will not be rented, park passes will not be purchased, food and souvenirs will not be purchased, and the list goes on and on. And we should keep in mind that, when in California, the motorhomes spend most of their time parked at the

campground, not racking up miles. In fact, we know from past surveys we've conducted that, on average, motorhomes travel between 3000 and 4000 miles per year total. Compared to the miles traveled by the commercial trucks operating routinely on CA roads, the CA miles traveled by out-of-state motorhomes and the associated emissions will be all but negligible.

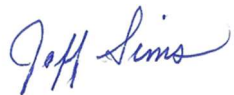
Thus, we believe that the economic costs of compliance substantially do outweigh the benefits of compliance and that there is no legitimate justification for including out-of-state motorhomes in the regulation. If this cannot be achieved by amending the draft reg's applicability section or enforcement provisions, then we would urge CARB to lengthen the temporary exemption period for non-gasoline powered motorhomes, from three days to at least 30 days. This would correspond to other regulatory patterns in California, such as the difference between rental car and leased car or the distinction between transient occupancy and permanent occupancy, both of which are set at 30 days. Please keep in mind, however, that just the burden of having to apply and pay for a "pass" will likely be enough reason to cause some would-be California visitors to go elsewhere and forego all that the state has to offer them.

In conclusion, the manufacturers of motorhomes and their suppliers are probably least affected directly by this HD I/M program. Much more immediately impacted is California tourism (campground operators, businesses around those campgrounds, etc.) and hundreds of thousands of people outside of California who will decide not to see the state in their diesel motorhome. We thank you for your consideration of these comments and would be happy to work with you in the coming months to develop appropriate provisions that will protect the public without being overly burdensome on motorhomes.

Sincerely,



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