



April 4, 2025

The Honorable John Lively  
Chair, House Climate, Energy and Environment Committee  
Oregon House of Representatives  
State Capitol, 900 Court Street, NE  
Salem, OR 97301

Re: Support for HB 3119

Dear Chair Lively:

The RV Industry Association (RVIA) appreciates this opportunity to comment on the problems the RV industry is facing due to the Advanced Clean Truck (ACT) Regulation in Oregon. The RV Industry Association is the national trade association of the \$140 billion dollar RV industry, representing over 500 manufacturers and component and aftermarket suppliers who together produce 98 percent of all RVs made 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 state and federal policymakers to promote and protect the RV industry and its members.

RVIA appreciates and supports the approach being contemplated by HB 3119. We recognize the work that Oregon has put into these regulations. Unfortunately, the ACT regulation will likely have the very real result that very few motorhomes will be available to be sold or registered in your state. Our member motorhome manufacturers have been told by their chassis suppliers that while there are currently several zero-emission chassis for most medium- and heavy-duty trucks, there are no fully electric chassis rated for motorhome application. Due to the requirement of selling certain percentages of EV chassis in proportion to internal combustion engine chassis, these suppliers are telling RV manufacturers that there will be no chassis for motorhomes that can be certified for a vehicle being sold or registered in Oregon. These suppliers have no zero emission chassis products to offer for sale to offset internal combustion engine sales, thus the only way these suppliers feel they can meet the ACT requirement on motorhomes is to not sell into the six ACT states. And as of now, the chassis suppliers have indicated that there is no change in sight for future years as well.

The vast majority of motorhomes are driven very few miles in a given year. According to the U.S. Environment Protection Agency (EPA) in its 2016 Greenhouse Gas regulation preamble,

motorhomes have an average Vehicle Miles Traveled (VMT) of only 2,000 miles in their first year.<sup>1</sup> Additionally, the EPA reiterated that motorhomes are not suitable vehicle applications for EV technology due to the projected impact of the weight and placement of EV batteries.<sup>2</sup> For this reason, the EPA categorizes motorhomes as custom vocational vehicles and did not include more stringent standards for motor homes certified to the optional custom chassis regulatory subcategory.<sup>3</sup>

The RV industry is continuing its efforts to develop viable zero-emission vehicles; however, such vehicles are still years away and at present there is no commercially available mass-produced ZEV motorhome in Oregon or any other market. Thus, we are asking Oregon to exempt motorhomes from the ACT Regulation, as is currently the case with emergency vehicles, or at least defer compliance for motorhomes until such time that ZEV chassis for the motorhome market are readily available and desired by consumers. This would allow RV manufacturers, RV dealers and consumers alike to avoid the loss of the entire motorhome industry in the state, while having minimal impact on the environment. It would also prevent an economic loss of several hundred millions of dollars for RV dealers and motorhome manufacturers.

The latest version of the amendments adopted to California's ACT by the California Air Resources Board (CARB) adds a definition for secondary vehicle manufacturer and a provision that would explicitly make it possible for secondary vehicle manufacturers to purchase and trade ACT credits. CARB has adopted EPA's existing definition for secondary vehicle manufacturer, which is located in section 40 of the Code of Federal Regulations at 40CFR1038.801.

In the definition, custom sleeper modifications and alternative fuel conversions that change actual vehicle aerodynamics are considered to be modifications. Since production of a motorhome generally involves custom sleeper modifications that change actual vehicle aerodynamics, and since motorhome manufacturers are completing the assembly of an incomplete vehicle, we believe that motorhome manufacturers should be deemed secondary vehicle manufacturers.

While we support giving these secondary vehicle manufacturers the opportunity to buy and trade ACT credits, this amendment on its own ignores the fact that, as EPA acknowledged in its Phase 3 GHG final rule, motorhomes are essentially poor candidates for electrification. Thus, a regulation that has only one realistic compliance path for motorhomes (purchasing costly ACT credits) is in fact no solution at all.

Therefore, RVIA continues to believe that the best way to provide business certainty to motorhome manufacturers would be to exempt motorhomes from the ACT Regulation in Oregon, or at least to defer compliance for motorhomes until such time as ZEV chassis for the

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<sup>1</sup> Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles—Phase 2. 81 Fed. Reg. 73478 in Table V-10 at page 73688.

<sup>2</sup> Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles—Phase 3. 89 Fed. Reg. 29440, 29568.

<sup>3</sup> EPA Phase 3 GHG Final Rule, April 22, 2024, 78 FR 29568.

motorhome market are available and desired by consumers. We urge the Committee to favorably report HB 3119.

Sincerely,

A handwritten signature in black ink that reads "Michael Ochs". The signature is written in a cursive, flowing style.

Michael Ochs  
Director, Government Affairs