



October 21, 2024

Honorable Steven Cliff, Ph.D.
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

via electronic submission at: <https://www.arb.ca.gov/lispub/comm/bclist.php>

Dear Dr. Cliff:

The RV Industry Association (RVIA) appreciates this opportunity to comment on the latest Proposed Amendments to the Advanced Clean Truck (ACT) Regulation. RVIA is the national trade association representing the diverse manufacturing businesses which manufacture more than 98 percent of all recreational vehicles (RVs) 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 state and federal policymakers to promote and protect the RV industry and its members.

We appreciate the work that the California Air Resources Board has put into these regulations. Unfortunately, the ACT regulation will likely have the very real result that no motorhomes will be able to be sold or registered in California. 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 one EV chassis for each three 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 California. 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 starting in 2025. And as of now, the chassis suppliers have indicated that there is no change in sight for future years as well.

As we have mentioned in previous comments, 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.¹ Additionally, the EPA reiterated that motorhomes are not suitable vehicle applications for EV technology due to the projected impact of the weight of EV batteries.² For this reason, the EPA categorizes motorhomes as custom vocational vehicles

¹ 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.

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

and did not include more stringent standards for motor homes certified to the optional custom chassis regulatory subcategory.³ .

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 California or any other market.

Thus, we are asking CARB 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 California environment. It would also prevent an economic loss of several hundred millions of dollars for California RV dealers alone and for motorhome manufacturers, some of which are based in California.

In 2023, motorhome manufacturers shipped a total of 5,898 motorhomes to California, as compared with the 134,956 Medium- and Heavy-Duty trucks and tractors sold in California last year. When these numbers are multiplied by the average first year VMT for each category (motorhomes – 2000; MHD trucks – 36,000), motorhomes represent only 11.8 million miles versus the 4.8 billion miles for medium- and heavy-duty trucks, making it obvious that an exemption for motorhomes will not have an adverse impact on environmental concerns.

The latest version of the amendments also plans to add a definition for secondary vehicle manufacturer and a provision that would explicitly make it possible for secondary vehicle manufacturers to purchase ACT credits. CARB is proposing to adopt EPA’s existing definition for secondary vehicle manufacturer, which is located in 40 CFR 1038.801 and reads as follows:

Secondary vehicle manufacturer means anyone that produces a vehicle by modifying a complete vehicle or completing the assembly of a partially complete vehicle. For the purpose of this definition, “modifying” generally does not include making changes that do not remove a vehicle from its original certified configuration. However, custom sleeper modifications and alternative fuel conversions that change actual vehicle aerodynamics are considered to be modifications, even if they are permitted without recertification. This definition applies whether the production involves a complete or partially complete vehicle and whether the vehicle was previously certified to emission standards or not.

In the definition, a modified vehicle is generally a vehicle where the certified configuration has been modified, which would typically exclude a motorhome manufacturer since they don’t need to recertify as they are not touching the emissions control system. However, the definition also says that 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 a partially complete vehicle, we

³ EPA Phase 3 GHG Final Rule, April 22, 2024, 78 FR 29568.

believe that motorhome manufacturers should be deemed secondary vehicle manufacturers. We request CARB clarify this in issuing the final rule.

While we support CARB giving 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 or at least defer compliance for motorhomes until such time as ZEV chassis for the motorhome market are available and desired by consumers. We appreciate the willingness of CARB staff to meet with us on this critical matter this past spring and look forward to working with them as we move forward.

Sincerely,

A handwritten signature in cursive script that reads "Michael Ochs".

R. Michael Ochs
Director of State Government Affairs, RVIA