



Oct. 17, 2022

Liane M. Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Proposed Advanced Clean Fleets Regulation

Dear Chair Randolph:

The RV Industry Association (RVIA) appreciates the opportunity to provide written comments on the California Air Resources Board's (CARB's) proposed Advanced Clean Fleets Regulation. RVIA is a national trade association representing the manufacturers and their component suppliers of America's family camping vehicles, including motorhomes, travel trailers, fifth-wheel trailers, truck campers and park models, collectively referred to as recreation vehicles or RVs¹.

Our comments focus on two aspects of the proposed rulemaking:

- The proposed requirements for high priority fleets in Section 2015.1 (Appendix A-2); and
- The proposed 2040 ZEV requirement in Section 2016 (Appendix A-4).

1) The proposed requirements for high priority fleets in Section 2015.1 (Appendix A-2)

As proposed, this section of the regulation would appear to cover motorhomes purchased by companies based inside or outside California that operate 50 or more motorhomes in California at any point in time in the course of a year. Regulated fleets are provided two compliance pathways to choose from: 1) the "ZEV addition" pathway in S.2015.1, or 2) the "ZEV fleet milestone" pathway in S.2015.2).

Under the "ZEV addition" compliance pathway, beginning Jan. 1, 2024, all vehicles added to a covered California fleet must be ZEVs. For fleets to comply with the option, zero emission MY24 motorhomes will need to be available. If not available, fleets may utilize the "ZEV Unavailability Exemption" in Section 2015.1(c)(5) which states that they may purchase a

¹ RVIA is a unifying force for safety and professionalism within the RV industry, works with government agencies to protect and promote the interests of RV businesses and camping consumers, serves as a clearinghouse for industry information and works with the media to educate the public about the benefits of RVing.

new ICE vehicle and exclude it from the ZEV addition requirement of section 2015.1(a) if no ZEV or NZEV of the needed configuration is commercially available and the conditions of section 2015.3(e) are met.

Under the “ZEV fleet milestone” compliance option in S.2015.2, beginning January 1, 2025, and each year afterwards by January 1, fleet owners must continuously meet or exceed the ZEV milestone for the California fleet as calculated in 2015.2(b) based on the milestone percentage requirements set forth in Table A ZEV Fleet Milestones by Milestone Group and Year. Table A provides ZEV fleet milestones for three groups (Milestone Group 1, Milestone Group 2, and Milestone Group 3). As those groups are defined in the proposed regulation, motorhomes do not fall into any of these categories. Consequently, it would appear that this compliance pathway would be unavailable to covered California motorhome fleets.

We believe that CARB should either amend the “ZEV fleet milestone” section to explicitly offer a compliance option for motorhome fleets (as is the case for specialty vehicles) or, preferably, amend section 2015(c) to exempt motorhomes from the regulation. We believe that this latter recommendation is most sensible given the Advanced Clean Trucks regulation is not likely to result in the production of zero emission motorhome chassis in the foreseeable future. If motorhomes are not exempted, the requirement would introduce a needless reporting burden for fleets and manufacturers.

2) The proposed 2040 ZEV requirement in Section 2016 (Appendix A-4)

Beginning with the 2040 model year, Section 2016(d) of the proposed regulation would require vehicles over 8500 lbs. GVWR offered for sale in California to be zero emission vehicles. In our view, it is inappropriate for CARB to extend this provision to motorhomes given that the cost impact will likely result in motorhomes being nearly abandoned as a recreation lifestyle. As we discussed with CARB staff previously in the context of the small off-road engine rulemaking, the batteries and motors necessary to power a motorhome will, depending on the size of the unit, increase the price of a motorhome by \$50,000 to \$100,000. Generally purchased by households with modest means, motorhomes will be out of reach for most American families. When motorhomes are no longer affordable, families will pursue other forms of recreation, likely involving air travel which is far worse for the climate. Motorhomes, which are infrequently operated and driven on average less than 4,000 miles per year, contribute very little to the emissions problem CARB seeks to address.

Notwithstanding the impact on American families, the loss of motorhomes in California will have negative impact on the California tourism economy and all those who are part of it. This includes RV campgrounds and countless businesses that are linked to RVing. The economic disincentives associated with this provision will be far greater than any environmental and or health benefits that might be derived from ZEV motorhomes, especially when taking into consideration that emissions that will be generated to mine all the minerals needed to produce the batteries.

For the reasons discussed above, we ask CARB to exempt motorhomes from the requirement in Section 2016(d).

Closing

RVIA thanks the agency for the opportunity to comment on the proposed Advanced Clean Fleets Regulation. If there are questions concerning the information contained in this letter, you can contact me via email at mochs@riva.org or by telephone at (571) 665-5860.

Sincerely,

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

Michael Ochs
Director, Government Affairs