



September 18, 2023

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 once again to comment on the latest Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus 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 motor homes, 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 thanks CARB for recognizing the difficulties that engine manufacturers are having to supply a sufficient number of compliant engines to the various companies that are completing vehicles powered by heavy-duty diesel engines. Amending the legacy engine provisions will allow engine manufacturers the flexibility necessary to transition to compliant diesel engine technology. While CARB estimates that there are nearly a million heavy-duty vehicles operated in California annually, the vehicles produced by RV manufacturers are a very small fraction of this number. Approximately 2350 heavy-duty motor homes were shipped to California in 2022 and shipments this year will be lower than that as overall shipments are down by about 45 percent.

As we mentioned in our July 2021 comments, the vast majority of motor homes are not driven many miles in a given year. According to the Environment Protection Agency in its 2016 Greenhouse Gas regulation preamble, motor homes have an average Vehicle Miles Traveled (VMT) of only 2000 miles per year. For the 2350 motor homes shipped to California last year, that's only 4.7 million miles. This would be the equivalent of only 47 commercial motor vehicles, each of which travel an average of 100,000 miles per year.

By far, the vast majority of diesel engines used by motor home manufacturers are supplied by Cummins, Inc. Our manufacturers tell us that they have been informed by Cummins and other engine manufacturers that there will not be sufficient numbers of compliant heavy-duty engines available in the next couple of years due to the uncertainty generated by the Omnibus Low NOx

rule. Restoring some needed flexibility will greatly assist in ensuring that engines will be available to maintain motor home production.

Without these engines, the RV industry will be unable to offer diesel motor homes in California, which will result in an economic loss of at least \$100 million for California RV dealers alone and have similar impacts for motor home manufacturers, some of which are based in California.

RVIA continues to believe that diesel motor home engines should be exempt from the Heavy-Duty Engine and Vehicle Omnibus Regulation for the 2024 and 2025 engine model years in order to provide business certainty to motor home manufacturers. However, these amendments go a long way to provide certainty for RV manufacturers.

Sincerely,

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

R. Michael Ochs
Director of Government Affairs, RVIA