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:

Winnebago Industries appreciates this opportunity to comment on the latest Proposed Amendments to the Advanced Clean Truck (ACT) Regulation.

With over 5,500 U.S. employees, Winnebago Industries is a leading U.S. manufacturer of outdoor lifestyle experiences under the Winnebago, Grand Design, Chris-Craft, Newmar and Barletta brands. We build quality motorhomes, travel trailers, fifth-wheel products, outboard and sterndrive powerboats, pontoons and commercial community outreach vehicles.

Our Winnebago, Newmar and Grand Design brands are synonymous with discovering and exploring outdoor adventures through RVs and motorhomes in the United States. For over 66 years, Winnebago Industries has helped millions of Californians explore the great outdoors, including our National Parks and National Forests, state, county and local parks, private campgrounds, lakes and beaches.

For general reference, a typical motorhome owner uses their vehicle as means to arrive at a destination and then the vehicle serves as a stationary base camp enabling them to engage in outdoor and recreational activities. With this, motorhomes have an average Vehicle Miles Traveled (VMT) of only 2,000 miles per year.[[1]](#footnote-1) Additionally, as the RV is self-contained, RVer’s are acutely aware of their resources and environment engagement and as such are traditionally great environmental stewards.

The previous paragraph demonstrates the low impact that RV’s have on overall emissions outputs based on limited miles used and lower volume of units in use when compared to automobiles and large trucks.

Additionally, the RV industry is a key economic driver with $11 Billion in total annual economic impact in the State of California with 2,989 businesses, 51,317 jobs paying $4 Billion in annual wages and generating $1 Billion in taxes paid[[2]](#footnote-2).

We appreciate the efforts that the California Air Resources Board has put into these regulations. However, the ACT regulation will have very real and catastrophic results for California RV dealers, consumers and related RV businesses, as a wide selection of motorhomes will not be able to be sold or registered in California. We have been notified by our Class 7 and 8 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 these motorhome applications. Due to the requirement of selling one EV chassis for each three internal combustion engine chassis, these suppliers are telling us that there will be no chassis available for these 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 in this category, thus the only way these suppliers feel they can meet the ACT requirement is to not sell these chassis to us for use 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 noted previously, the vast majority of motorhomes are driven very few miles annually. 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.[[3]](#footnote-3) For this reason, the EPA categorizes motorhomes as custom vocational vehicles and exempts them from the more stringent Phase III Greenhouse Gas emission standards for Model Years 2026 to 2032.

We are working with our chassis suppliers to source viable zero-emission vehicles; however, at present there is no commercially available mass-produced ZEV motorhome available for California or any other market.

With this reality, we are respectfully asking CARB to exempt motorhomes from the ACT Regulation, as is currently the case with emergency vehicles. This would allow us and our chassis suppliers to continue efforts to develop fully ZEV chassis for motorhome applications and enable California RV dealers and consumers alike to avoid the loss of the motorhome industry in the state, while having minimal impact on the California environment. It would also prevent an economic loss of hundreds of millions of dollars for California RV dealers and jobs for their employees.

Additionally, we are supportive of the CARB proposal to adopt EPA’s existing definition for secondary vehicle manufacturer and a provision that would explicitly make it possible for secondary vehicle manufacturers to purchase ACT credits.

Winnebago Industries is also aware of, and are supportive of, the comments filed by the RV Industry Association specific to the proposed amendments to the Advanced Clean Truck (ACT) Regulation and we appreciate the opportunity to submit these comments to the California Air Resources Board.

Sincerely,



Chad Reece

Winnebago Industries, Vice President, Government and Industry Relations

1. Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles— Phase 2. 81 Fed. Reg. 73478, 73688. [↑](#footnote-ref-1)
2. RVs Move America Economic Impact Study June 2022 [↑](#footnote-ref-2)
3. Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles—Phase 3. 89 Fed. Reg. 29440, 29568. [↑](#footnote-ref-3)