



Via electronic submittal to <https://www.arb.ca.gov/lispub/comm/bclist.php>

April 7, 2023

Steven Cliff, Executive Director
California Air Resources Board
1001 I Street
Sacramento, California 95814

Subject: Advanced Clean Fleets Regulation – Notice of Public Availability of Modified Text and Availability of Additional Documents (published March 23, 2023)

Dear Dr. Cliff:

The RV Industry Association (RVIA) submits these comments in response to the subject-referenced notice requesting public input on the proposed regulation known as the Advanced Clean Fleets (ACF) regulation.

RVIA strongly opposes the proposal to modify the requirement in the proposed regulation that would require 100 percent of medium- and heavy-duty motorhomes produced and delivered for sale to be zero-emission vehicles beginning with the 2036 model year. This requirement is inconsistent with the Advanced Clean Trucks (ACT) regulation phase-in schedule which provides chassis manufacturers the flexibility to prioritize the development of electrified chassis to demand for zero emission vehicles. Motorhomes are generally not purchased by commercial fleets and so the proposed ACF regulation will have little to no impact on the overall demand for electrified motorhomes. As has always been and will continue to be the case, motorhomes will primarily be a discretionary purchase by families whose purchase decisions are highly cost sensitive. Unlike commercial businesses that will have no choice but to procure increasingly greater percentages of zero emission vehicles that are compliant with the ACF regulations, motorhome buyers have no equivalent forcing regulatory requirement. When faced with higher costs they will likely forego purchasing a motorhome and choose to recreate in a different manner. This is bad for our industry and even worse for California residents who dream of one day owning a motorhome.

CARB's ACT regulation mandates electrification only up to 75% of Class 4-8 chassis and only 55% of Class 2b-3 chassis. There is little doubt that, given the costs associated with electrifying motorhome chassis and the fact that the ACF regulation is not applicable to most motorhome buyers, motorhomes will be one of the last segments to be fully electrified. Again, vehicle categories having a demand pull for electrification (i.e., those covered by the ACF regulation) will be electrified first.

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Given motorhomes will not likely be fully electrified until later next decade (as allowed by the ACT rule), we ask that the ACF regulation specify the 2040 model year as the earliest year in which the 100 percent zero emissions vehicle requirement in Section 2016 of Title 13 would be applicable to motorhomes.

We thank you again for the opportunity to comment on this far-reaching proposal and would welcome the chance to explore alternatives with you and your staff in the future. I can be reached via email at mochs@rvia.org, or by phone at 571-665-5860.

Sincerely,

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

Michael Ochs
Director of Government Affairs