



December 5, 2024  
California Air Resources Board

Dear Sir or Madam:

I am responding to the request for comments on the proposed Amendments to the Advanced Clean Trucks regulation and the ZERO-Emission Powertrain Certification Test Procedure.

The proposed amendments to apply these regulations to vehicles with a GVW of 8500 or higher with no exceptions for vehicles that are typically driven for less than 8,000 miles PER year seems onerous and discriminatory to California residents that own and operate Recreational Vehicles.

The typical RV owner drives less than 8,000 per year (many only 2,000-5,000 miles per year) as the primary PURPOSE of such vehicles is to drive a few hours away to a state park, national park or other non-urban setting and STAYING for several days at a time. Unlike large 18 wheelers (Semi tractor) that typically drive 80,000-110,000 miles PER YEAR, RVs are not purchased or used with the intent to log lots of miles. The PRIMARY purpose of a SEMI Tractor is to drive AS MUCH AS POSSIBLE to move cargo.

I beg you to rethink the impact of a blanket BAN on all on-road vehicles over 8500 GVWR. Consider the PURPOSE of a vehicle in determining the IMPACT on our air. Absent an exemption for RVs, please consider an exemption for RVs that are equipped with solar panels AND a CARB compliant generator as these features are intended to reduce any impact on the environment when stationary.

We, as consumers, need more clarity from CARB as to how this impacts the RVs that we purchase. I personally placed an order for an RV back in APRIL 2023 and have yet to receive it due to the backlog of this manufacturer.

Thank you for your consideration.

Sincerely,

*Barbara Cox-Winter*

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