



January 30, 2025

The Honorable John Lively
Chair, House Committee on Climate, Energy and the Environment
Oregon House of Representatives
900 Court Street, NE
Salem, OR 97301

Re: Support for HB 3119

Submitted electronically at: <https://apps.oregonlegislature.gov/liz/2025R1/Testimony/HCEE>

Dear Chairman Lively:

The RV Industry Association (RVIA) appreciates this opportunity to comment on HB 3119, legislation to delay implementation of the Advanced Clean Truck (ACT) regulation in Oregon. RVIA is the national trade association representing over 500 manufacturers and component and aftermarket suppliers who together build more than 98 percent of all RVs produced in the United States — including motorhomes, travel trailers, fifth-wheel travel trailers, folding camping trailers, and truck campers. The American-made RV industry contributes \$140 billion annually to the U.S. economy including \$4 billion in Oregon. 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.

We appreciate the work that the Oregon Department of Environmental Quality has put into these regulations. Unfortunately, the ACT regulation could result in a much lower number of motorhomes being able to be shipped, sold, or registered in Oregon. Our member motorhome manufacturers have been told by their chassis suppliers that while there are currently several zero-emission chassis for most medium- and heavy-duty trucks, there are no fully electric chassis suitable for motorhome production. Due to the requirement of selling a certain percentage of EV chassis for each internal combustion engine chassis, these suppliers are telling our manufacturers that there will be no chassis for motorhomes that can be certified for a vehicle being sold or registered in Oregon. These suppliers have no zero emission chassis products to offer for sale to offset internal combustion engine sales, thus the only way these suppliers feel they can meet the ACT requirement on motorhomes is to not sell into the six ACT states starting in 2025. And as of now, they tell us there is no change in sight for future years as well.

We appreciate that the credit system allows for the continued sale and registration of new motorhomes in Oregon when chassis manufacturers purchase credits or choose to utilize the carry forward credit system. We also appreciate that RV manufacturers can purchase credits; however, there is no guarantee that chassis manufacturers will take those credits. While the credit system provides an opportunity for new motorhomes to be sold and registered in Oregon, we are

concerned about the availability and cost of credits and whether chassis manufacturers will be able and willing to utilize them.

The vast majority of motor homes are driven very few miles in a given year. According to the U.S. 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. 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. For these reasons, 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.

The RV industry is continuing its efforts to develop viable zero-emission vehicles; however, such vehicles are still years away and at present there is no commercially available mass-produced ZEV motorhome in Oregon or any other market. We asked the California Air Resources Board (CARB) to consider exempting motorhomes from the ACT regulation as is currently the case with emergency vehicles, or at least deferring compliance for motorhomes until such time that ZEV chassis for the motorhome market are readily available and desired by consumers. This would allow RV manufacturers, RV dealers and consumers alike to avoid the loss of the motorhome industry, while having minimal impact on the environment.

We are supportive of the delay in implementation of the ACT in Oregon contemplated in HB 3119 and would urge this committee to vote in favor of the bill and move it to the full House for consideration.

Sincerely,



R. Michael Ochs
Director of State Government Affairs