



April 19, 2023

Governor Gavin Newsom
1021 O Street, Suite 9000
Sacramento, CA 95814
Phone: (916) 445-2841

Subject: Impact of California's Heavy Duty Inspection and Maintenance Program on Motor Home Owners

Dear Governor Newsom,

I am the President of the Family Motor Coach Association (FMCA), one of the largest organizations in North America dedicated to the support of camping and recreational vehicle use. FMCA has 73,557 members in the United States and 1,758 members in Canada. Since its inception in 1963 FMCA has issued more than 500,000 memberships to families who look to the association as their source of information about all facets of RV ownership and travel.

The State of California recently updated its Heavy Duty Inspection and Maintenance Program (HD I/M.) Under these new regulations, motorhomes registered outside California are not subject to the HD I/M Program, but California-registered motorhomes will be required to undergo compliance testing once annually when the periodic testing requirements phase-in during 2024. This decision has an extreme adverse impact on many of our members who proudly reside in California. These residents enjoy traveling within their state and spending their tourism dollars there, but this regulation may well cause many of them to abandon camping entirely.

Unlike commercial vehicles, motor homes are generally owned by individuals of relatively modest means, and many can be still in use after 20 to 25 years. The cost to retrofit these engines to meet the new standards would, in many cases, be completely out of reach for these individual owners. Many older people love to travel but are no longer capable of "tent-camping" or other more strenuous methods. Some have medical devices such as



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oxygen generators or CPAP machines which require a steady supply of electricity. Others have breathing issues which preclude their sleeping in hot weather without air conditioning. The motorhomes are essential to their enjoyment of camping and travel.

Furthermore, I submit that air quality will not be significantly improved by requiring the motorhomes to comply with these regulations. While California DMV shows over 12,658,000 commercial and privately owned trucks registered in California, it does not appear to maintain data on the number of motorhomes. The best data available was from the RV Industry Association (RVIA) which reports that 11% of the households in California own some type of Recreational Vehicle (RV) (note this is all RV's, not just motorhomes.) So the maximum number of RV's in the state would be 1,453,934 and the number of motorhomes would be significantly less.

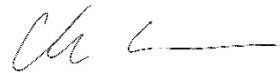
The emissions from this relatively small number of motorhomes, used sporadically by vacationers, would pale in comparison to the emissions of over 12 million trucks used daily in commerce and deliveries. While I understand the concerns in California about air quality and support overall efforts to improve it, your inclusion of motor homes in these requirements will result in a definite hardship to your residents without a corresponding increase in air quality.

I request that you direct the California Air Resources Board to reconsider the inclusion of motorhomes registered in California in the Heavy Duty Inspection and Maintenance Program.

Respectfully,



Rett Porter
National President
FMCA



Chris Smith
Chief Executive Officer
FMCA