

January 30, 2025

Dear Members of the House Committee On Climate, Energy, and Environment,

Climate Solutions writes to urge you to **oppose HB 3119 and to uphold the Advanced Clean Trucks (ACT) rule on its current timeline** for the following reasons:

**Implementing the ACT rule is crucial for protecting public health and meeting our climate goals.**

Despite some progress due in large part to previous clean air regulations, medium and heavy-duty vehicles (MHDV) continue to account for [70% of Oregon's NOx pollution, 64% of particulate matter emissions, and 42% of climate pollution](#) from transportation—though they only account for ~10% of vehicles on the road. A two-year delay will lead to 352 preventable deaths and [\\$4 billion in health costs](#) for the state. Diesel pollution affects the whole state, with [19 of 36 counties](#) at pollution levels high enough to increase the lifetime risk of cancer. Every diesel truck, van, and bus we replace with a zero-smog, electric version, creates immediate health benefits to local communities, families, workers, and truck drivers. The urgency with which we transition to clean trucks must reflect the urgency of the health crisis caused by transportation pollution today. This regulation, coupled with the Clean Fuels program and vehicle and charging incentives, is the most cost-effective way to curb climate pollution from medium- and heavy-duty vehicles. After a record-breaking wildfire season last year and the hottest year in recorded history, Oregon cannot afford to wait even longer to start cutting this major source of climate pollution.

**Oregon is on track to achieve the Advanced Clean Truck requirements without any delay.** The Advanced Clean Truck rule ensures many more zero-emission trucks are available for fleets, businesses, governments, and others in Oregon who want to transition. Oregon's businesses are ready to lead in this transition, with many already meeting ACT requirements ahead of schedule (in addition to the three-year compliance window they have). Those pushing for a delay of these existing regulations are basing their arguments on a [false crisis](#), focusing arguments on the heaviest-duty class 7-8 trucks. By design, most adoption to date has been in lighter-duty classes, and [most truck manufacturers are already compliant](#) with the ACT even though there is a three year compliance window. Regarding charging availability, the lighter-duty vans and trucks comprising the bulk of compliant vehicles in early years can use the same chargers that cars use and rely on "behind the fence" infrastructure rather than public charging. Even when the class 7-8 category reaches the end target of 40% electrification of new sales in 2035, they will consume only 3% of the state's power supply.<sup>1</sup> We have the technology for the ACT today, with over [50% of the MHDV market traveling 200 miles or less per day](#).

**In the face of federal rollbacks, Oregon must maintain its current progress toward cleaner air, innovative technology, and cutting climate pollution.** Last time Oregon failed to keep up with California's vehicle emission standards, [truck manufacturers pushed more polluting trucks onto Oregon's roads](#)—a risk the state faces again as Washington and California move forward with the ACT this year. We should not allow our state to fall back and become a diesel dumping ground for dirtier vehicles while even local brands like Nike roll out zero-emission trucking in [Europe](#) and [China](#), and Daimler targets [50% electrification in Europe over the next five years](#). Delaying the ACT only hinders local industrial growth by

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<sup>1</sup> Wilson, Sam. "Ready for Work 2: On the Road to Clean Trucks." Forthcoming. Cambridge: Union of Concerned Scientists, 2025.

increasing uncertainty in the market (an action that Oregon's Clean Tech Task Force has [recommended against](#))--and stalls essential charging infrastructure buildout, supported by [\\$35 million from the state](#) and [\\$84 million from the federal level](#).

**Delaying the ACT by two years to 2027 is a trojan horse for ending the program altogether.** Allowing an existing regulation that is already in effect to be stopped and delayed by multiple years sends a confusing market signal that businesses cannot trust the rules of the road that are in place with any certainty. A later compliance as HB 3119 would mandate would also mean a steeper compliance requirement in 2027 that may be harder to meet. To achieve a more gradual transition like the ACT provides, the earlier the better. The Department of Environmental Quality's current rulemaking process focused on the Advanced Clean Truck rule compliance pathways is the venue where stakeholders including industry perspectives can engage and find resolution to any lingering concerns. While federal rollbacks of bedrock climate and clean air protections are already underway, the state legislature should not entertain a proposal now to roll back rules that are already in effect and were adopted with [widespread community support](#).

Thank you for consideration of these comments opposing HB 3119 and I am available as a resource for any technical or other questions.

Brett Morgan  
Oregon Transportation Director  
Climate Solutions  
Brett.Morgan@climatesolutions.org