



January 30, 2025

Lynden Incorporated
P. O. Box 3757
Seattle, WA 98124-3757
Main: (206) 241-8778
Toll Free: (800) 243-8415
Fax: (206) 426-3201

Dear Legislators,

The Lynden family of companies started transporting freight in Washington in 1906, and began serving in Oregon not long after that. Our current fleet includes approximately 800 trucks supporting retailers, manufacturers, the dairy industry, and many other businesses and consumers in Oregon. We have approximately 2,500 employees in our freight transportation operations, and purchase equipment from Oregon manufacturers and dealers. Lynden strives to operate in the most efficient manner with the highest regard for the health and safety of our employees and protection of the environment. We continuously evaluate our operations and implement solutions that will reduce cost, fuel and time, all ensuring quality service AND lower emissions.

We are writing today to express support for HB 3119 and explain how the mandates on truck sales affect us, and how they negatively impact Oregon. The CARB-adopted Advanced Clean Truck (ACT) rule requires manufacturers to sell zero emission vehicles (ZEV's) at increasing percentages every year ahead of the sale of diesel-powered trucks. The main challenges that make ACT impractical is that for Heavy Duty (also known as Class 8) trucks there are NO Zero Emission trucks being manufactured and sold that meet our operational requirements. The products on the market do not meet our needs because the distances of our trips exceed the range provided by battery electric vehicles, battery electric vehicles are substantially heavier and result in having to reduce payload and make more trips, and the capital cost to purchase battery electric vehicles make them cost-prohibitive.

Additionally, the publicly available charging infrastructure for battery electric vehicles is non-existent, which means it is up to the fleets to develop their own 'behind the fence'. However, that model does not work for trucks that exceed the full 'tank' (range) of an electric truck and fleets are not in the business of building fueling stations. A battery electric truck is approximately three times the cost of a traditional truck and, if it could be operated, would not pay for itself.

The HVIP program (financial incentive program in California) started 15 years prior to the ACT rule helped create some charging infrastructure. Currently, there are no financial incentives provided in Oregon, and non-existent charging. As well, California adoption of battery electric vehicles has primarily been at ports, which have mandated their use, their trips are generally short, and the application is not commercially competitive.

In promoting zero emissions trucks, ACT also bans more practical, economical, and environmentally sound solutions. For example, Renewable Natural Gas (RNG) and Renewable Diesel (RD) would work for our operation but are not viable long-term low emission solutions due to regulatory policy. Both RD and RNG have lower carbon emissions (RNG is usually

negative emissions), are available today, and receive incentives through the Clean Fuels Program (CFP), but do *not* meet California standards under the ACT rule. If the goal is reduction of harmful emissions, then the use of RD and RNG fuels should be incentivized over those with higher carbon intensities (hydrogen and electric) rather than regulated out of existence. In an industry as diverse as transportation, we need more options, not fewer, to solve the economic and environmental challenges we face.

As a leading bulk milk hauler, and a top-ranked EPA Smartway winner for efficiency and low emissions, we optimize the design of our trucks and build lighter tanks to ensure that each load can carry the maximum amount of milk and not exceed our weight limit of 105,500 pounds. Every day, we transport 2 million gallons of milk over a distance equivalent to 3 trips around the Earth. The equipment customization ensures we make fewer trips, and electric trucks, were they viable, would guarantee more trucks on the road and increase the number of trips for the same amount of product. The routes are in rural areas with limited resources, often crossing mountain passes and significant temperature fluctuations. By its nature, milk production cannot be delayed or suspended; there is no time to stop and charge a truck for several hours.

Electric trucks will delay operations and raise costs due to their limited range, higher vehicle weights, higher equipment prices, and reliability issues. It will require more trucks and more miles to move the same amount of goods. As a result, the prices of milk, cheese, and other dairy products to consumers will increase significantly and product shortages will be likely. More trucks will also congest the already congested roads (leading to more emissions). Another outcome will be that larger companies from other states will be at an advantage to operate in Washington and will replace smaller, independent fleets.

Please consider supporting HB 3119. It will give us all time to create more carbon reducing options, lasting change, as well as protect the ever-fleeting economic stability we all enjoy.

Sincerely,

Stephanie Sears

Stephanie Sears

Environmental Impact Manager, Lynden Inc.