

Submitter: Steve Gordon  
On Behalf Of:  
Committee: House Committee On Climate, Energy, and Environment  
Measure, Appointment or Topic: HB3119

I represent Freightliner NW, a dealer for the Portland based truck manufacturer that holds the leading market share in North America's. With 144 employees across six Oregon locations, we're deeply invested in Oregon's future.

While we support environmental progress, the current implementation of CARB's ACT rule by Oregon DEQ is counterproductive and demands immediate reconsideration. Here's why:

First, the regulation is paradoxically increasing emissions. Manufacturers, facing penalties, now require EPA Zero Emission Vehicle vouchers before releasing diesel trucks for sale. Since current ZEV technology doesn't meet most fleet needs, operators are forced to retain older, higher-polluting vehicles - directly contradicting the rule's environmental goals.

The economic realities are stark. ZEVs cost \$400,000 - more than 250% above equivalent diesel trucks. Their 200-mile range pales against diesel's 1,000-mile capacity, and the additional 8,000 pounds of battery weight significantly reduces payload capacity. Moreover, America's robust diesel fueling infrastructure contrasts sharply with the virtually nonexistent charging network, complicated by widespread electrical capacity limitations for private charging.

Consider the broader economic implications. Trucks transport 70-80% of America's goods. This regulation has blindsided an industry that typically plans purchases years ahead. Oregon fleets are now looking to neighboring states for purchases, threatening both our business viability and local employment. States without these restrictions - Idaho, Montana, and Utah - stand to capture interstate freight opportunities, drawing business away from Oregon's artificially constrained market.

As a dealer, nothing would benefit us more than government-mandated sales of premium-priced vehicles. However, reality tells a different story. This regulation has effectively frozen new truck sales in Oregon, created an unfair advantage for out-of-state competitors, and will harm our environment despite noble intentions. I strongly urge you to delay implementing this well-meaning but premature regulation that undermines Oregon's economic vitality and environmental goals.

For the sake of Oregon's businesses, workers, and environmental future, please consider this testimony carefully.

Thanks for the opportunity to speak out on this important topic.