



# Associated Oregon Loggers, Inc.

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January 30, 2025

The Honorable John Lively, Chair  
House Committee On Climate, Energy, and Environment  
Oregon State Capitol  
Salem, OR 97301

Subject: HB 3119 - **SUPPORT**

Chair Lively, Vice Chairs Gamba and Levy, and Members of the Committee:

For the record, my name is Amanda Sullivan-Astor, Forest Policy Manager at Associated Oregon Loggers and a certified forester. I am submitting this testimony in support of HB 3119, which delays the implementation of the Advanced Clean Truck (ACT) Rules to align with EPA's Federal Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles - Phase 3.

## **Key Points Supporting HB 3119:**

- **Alignment with Federal Timelines:** Synchronizing Oregon's rules with federal standards ensures the state remains competitive in the national economy, especially in transportation and wood products sectors. Oregon businesses cannot afford additional costs when competing with other regions like the U.S. South.
- **ACT Rules Delay Emissions Reductions:** The ACT rules will force forest operators to maintain and repair older, less efficient vehicles for longer, as cost-effective zero-emission vehicle (ZEV) technology and infrastructure are not yet feasible. This prolongs emissions from aging fleets, slowing Oregon's ability to achieve meaningful reductions.
- **Impractical ACT Rules:**
  1. **No Feasible Technology or Infrastructure:** Cost-effective ZEV options for medium and heavy vehicles are unavailable, with rural areas lacking essential infrastructure.
  2. **Economic Reliance on Medium and Heavy Vehicles:** Forest operations require fleets of medium vehicles (e.g., pickups and vans) to support heavy vehicles. Both vehicle classes are essential to the working economy.
  3. **Inflationary Impacts:** ACT rules will increase costs for transportation, inflating the prices of all Oregon goods and services and disproportionately harming working families, rural communities, and small businesses.
  4. **Disproportionate Burden on Rural and Low-Income Communities:** ACT unfairly burdens those least able to absorb these costs, creating economic hardship for rural Oregonians.

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## Specific Challenges for Forest Operators:

- ZEV trucks are incompatible with forest operations due to:
  - **Lower Payload Capacity and Range:** ZEV trucks perform poorly in adverse rural conditions.
  - **Higher Costs:** ZEV trucks cost 2-3 times more than traditional vehicles.
  - **Inadequate Infrastructure:** Rural areas lack charging stations, and installation costs are prohibitive.

The ACT rules, as written, undermine Oregon's forest operators and broader economy. These regulations must be delayed to avoid irreparable harm while creating space to explore practical alternatives that balance environmental goals with economic feasibility.

I urge the Committee to support HB 3119. Thank you for your time and consideration.

Sincerely,

**Amanda Sullivan-Astor, CF**

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