

Submitter: Garret Ogan
On Behalf Of: Roseburg Forest Products
Committee: House Committee On Climate, Energy, and Environment
Measure, Appointment or Topic: HB3119

To Oregon legislators,

I'm sure you have heard critical feedback and various testimonies against the Advanced Clean Truck (ACT) rule from various trucking companies, and I would like to bring the perspective of a manufacturer and shipper. Roseburg Forest Products is an international player in wood products, grown from our humble origins in 1936 in Roseburg, Douglas County. We are dedicated to sustainably managing our timberland and being good stewards of the land we walk and air we breathe. Part of our value proposition as a wood products supplier and allows us to compete on the caliber we do, is the ability to mix and match product types (plywood, lumber, engineered products, value add panels, etc.) from our five plants clustered Southern Oregon. Builders, home centers, and distribution centers can purchase a full truck of material of varying product type to manage their inventories better and reduce freight costs. This is made possible by a fleet class 8 heavy-haul trucks. We transport raw materials and finished goods between the plants and local suppliers.

Our Transportation department is committed to sustainability. From 2019 to 2025, we removed all non-tier 4 emissions tractors from service, converted to 99% renewable fuel source made from agricultural by-products, and invested in new technology such as an electric-assist hybrid truck to increase fuel economy. With full battery electric trucking on the horizon, we look forward to embracing this technology, however, the technology in its current state is not viable for our business needs. On any given day, one of our tractors will haul at a gross weight of up to 105,500 lbs between 250-600 miles across some of Oregon's most challenging highways (Highway 42, I5 across Sexton Pass, Robert's Mountain, and others). A test conducted by Timber Products and Pape Kenworth found that on hilly terrain, the actual range of the T680e was less than 70 miles. With this capability, one of our trucks would have to wait for 2-3 hours at each plant to charge before being able to continue their day and would prevent them entirely from making deliveries beyond 70 miles. This would immediately cut our productivity by at least 50%. Then there's the cost of charger installation, power supply at 3 phase 480v, purchasing the electric trucks themselves, training and certification for mechanics and service technicians. The list goes on and on. Even if we don't convert the entire fleet, the infrastructure still needs to be purchased and installed for just one electric truck that isn't able to do the job. Highly cost prohibitive in such a segment with thin margins. We requested an evaluation from PacifiCorp for general figures of what it would cost to convert the entire fleet, and just to get power to our location would cost tens of millions of dollars.

This would disrupt manufacturing in Oregon across all industries, not just forest products.

The intention for ACT is well intended, however, in reality fleets will operate old diesels for longer than intended due to inability to purchase new diesel trucks thus polluting the environment more.

Let's allow time for battery technology to improve, perhaps look at more viable technologies such as hybrid systems that further reduce harmful emissions while retaining the range capability of traditional diesel. The committee should also address power generations and distribution infrastructure to prepare the grid for increased demand.