



Office of The City Administrator
Vivian Satterfield, Chief Sustainability Officer

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January 29, 2025

House Committee on Climate, Energy & Environment

Re: City of Portland opposes HB 3119 to prohibit the DEQ from implementing or enforcing the Advanced Clean Trucks Rule (ACT) before Jan. 1st, 2027.

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

The City of Portland appreciates the important work of the Oregon Environmental Quality Commission and the Oregon Legislature, and understands the complexities of implementing regulations. We also recognize the urgent need for these regulations and hope you will consider not adopting a pause to the ACT Rules.

The City of Portland has committed to decreasing carbon emissions 100%, from 1990 levels, by 2050 with a 50% reduction by 2030. This commitment was adopted by Portland's City Council via our Climate Emergency Work Plan and our Climate Emergency Declaration. As of 2022, the transportation sector was responsible for 41% of carbon emissions in Multnomah County. According to the Oregon Department of Environmental Quality (DEQ), medium and heavy-duty vehicles are responsible for 42% of all greenhouse gas emissions, from on-road vehicles, in Oregon.

Examples of work City staff are doing to decrease pollution and emissions from medium and heavy-duty vehicles include decarbonizing our own fleet, supporting local businesses to electrify their fleets and operationalizing a Zero Emission Delivery Zone pilot. However, the City has a limited sphere of control. We rely heavily on statewide ACT regulations to protect our community members and help us reach our equity and climate goals. Heavy-duty vehicles can remain on our roads for up to 30 years, so the impact of a one-year delay could be felt for decades. Additionally, Oregon's delay could result in rollbacks for other states that have adopted California emission standards.

The City of Portland approaches this work with an equity lens. Low-income Portlanders and communities of color are disproportionately exposed to transportation-related poor air quality. As we strive to reduce carbon emissions associated with heavy and medium-duty vehicles, we also need to reduce their toxic tailpipe pollution. Delaying the implementation of these regulations will result in more diesel pollution, causing more asthma attacks, respiratory illnesses and potentially even deaths.



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A recent [California Truck Availability Analysis](#), completed by the California Air Resources Board, shows that truck engine manufacturers have ample flexibility to comply with ACT Rules. Vehicle manufacturers were directly involved in drafting these regulations and committed to the terms of ACT rules via the [Clean Truck Partnership](#) agreement. It is now the job of the government to hold manufacturers accountable to the original terms of ACT rules.

Thank you for considering our input. We look forward to continuing our partnership to move Oregon toward achieving our shared goals.

Sincerely,

Vivian Satterfield
Chief Sustainability Officer
City of Portland, Oregon