

**Dear Chair Lively, Vice-Chairs Gamba & Levy and Members of the Committee,**

I am writing today in strong opposition to HB 3119, a bill that would unnecessarily delay the implementation of the Advanced Clean Trucks (ACT) Rule to at least January 1, 2027 and potentially well beyond that date.

**Feasibility**

The medium- and heavy-duty vehicle (MHDV) manufacturing industry has the technology, model diversity and capacity to implement ACT today. Already, zero-emission MHDV models from more than 15 diverse manufacturers are operating commercially on Oregon roads. Those models, available today, have the capacity and range to meet the needs of many fleets and common duty cycles. Roughly 70% of MHDVs travel fewer than 50 miles daily, easily allowing for charging infrequently and in their home bases. Many larger tractor trucks are known to travel less than 200 miles a day and return to their home bases nightly, allowing for overnight charging. The charging & range needs of long-haul trucking will be met overtime with improved range and charging infrastructure and ACT allows for this flexibility.

**Public Health**

It is well known that exhaust from MDVs is a leading cause of air pollution worldwide and particularly harms front-line communities who are more likely to work and live close to transportation corridors. The unnecessary proposed delay in implementation of the ACT Rule delays the onset of reduction in that pollution resulting in additional unnecessary deaths and illnesses. The proposed delay would also leave Oregon subject to the dumping here of older, more polluting, MHDVs, as happened before when neighboring states moved forward without Oregon.

**Facts**

It is important to pay attention also to what the ACT Rule does not legislate. To wit:

- ACT does not prevent the sale of combustion MHDVs, now or ever.
- ACT does not require the removal of combustion MHDVs, now or ever.
- ACT does not regulate the actions or capabilities of dealers or fleet owners, it regulates only manufacturing companies.

**Public support**

The ACT Rule in Oregon went through an extensive public comment period before being adopted in 2021. Unnecessarily delaying the start of implementation severely undercuts the validity of the public review process in Oregon.

**References:**

Union of Concerned Scientists

(<https://olis.oregonlegislature.gov/liz/2025R1/Downloads/PublicTestimonyDocument/117491>)

I urge you to please vote NO on HB 3119. Thank you for listening.

Sincerely,  
Daniel D. Frye, PhD