



To the House Committee On Climate, Energy, and Environment:

We strongly urge the legislature to delay the implementation of the **Advanced Clean Trucks (ACT)** regulations in Oregon until January 1, 2027, as proposed in this bill. Premature adoption of these regulations will have a significant negative impact on businesses in the trucking and related industries across the state.

Implementing the ACT regulations before 2027 creates several critical challenges for Oregon businesses:

- **Supply Chain Disruptions and Increased Costs:** The current supply chain for zero-emission medium and heavy-duty vehicles (ZE M/HDVs) is still developing. Premature implementation will lead to limited vehicle availability, driving up purchase prices and creating significant delays in acquiring necessary vehicles. This will disproportionately affect smaller businesses that lack the resources to compete in a constrained market. These increased costs will ultimately be passed on to consumers, impacting the overall economy.
- **Infrastructure Gaps:** Oregon's charging and refueling infrastructure for ZE M/HDVs is not yet robust enough to support widespread adoption. Forcing businesses to transition to these vehicles before adequate infrastructure is in place will severely limit their operational efficiency and increase costs associated with range anxiety and downtime. A delay will allow time for the necessary infrastructure development to catch up.
- **Technological Maturity:** ZE M/HDV technology is still evolving. A delay will allow businesses to benefit from advancements in battery technology, charging infrastructure, and vehicle performance, potentially leading to more cost-effective and efficient solutions in the long run. Locking businesses into current technology may prove to be a costly mistake.
- **Competitive Disadvantage:** Implementing these regulations ahead of neighboring states will put Oregon businesses at a competitive disadvantage. Businesses in other states with less stringent timelines will have lower operating costs, making it harder for Oregon companies to compete. This could lead to businesses relocating or reducing operations within the state.
- **Economic Burden:** The combined impact of higher vehicle costs, infrastructure limitations, and technological immaturity will place a substantial financial burden on Oregon

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businesses, particularly small and medium-sized enterprises. This will stifle economic growth and potentially lead to job losses.

A real life example would be that if this were to go forward, a majority of the fire departments who have been responsive to the widespread fires in California would no longer be able to operate and relief fire trucks would not be able to enter California to support firefighting efforts because they are all running diesel engines. Portland, Oregon has one electric fire engine at a cost of approximately \$1.8 million. This would create tremendous impacts, not only on saving lives, businesses and lands, but the exponential cost to cities having to purchase such equipment that will be out of reach for many; especially in rural areas.

Delaying the implementation until 2027 will allow for a more orderly transition, giving businesses time to adapt, infrastructure to develop, and technology to mature. This will ultimately lead to a more successful and sustainable adoption of zero-emission vehicles in Oregon. We respectfully request your support for this delay.

Respectfully Submitted on behalf of the Canby Area Chamber of Commerce and our member businesses.

//s// Belinda Goody
CEO

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