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May 7, 2025

To Whom It May Concern,

On behalf of the Springfield Area Chamber of Commerce and the diverse network of businesses we represent, we appreciate the opportunity to comment on the proposed implementation of the Advanced Clean Truck (ACT) and Heavy-Duty Omnibus (HDO) rules.

Earlier this year, we submitted testimony to the Oregon Legislature in support of legislation that would have delayed implementation of these rules by two years. That bill did not move forward, but the concerns we raised remain unresolved and are highly relevant to the current rulemaking process.

The businesses we represent—from logistics companies to construction contractors and manufacturers—are committed to environmental stewardship and are actively exploring clean vehicle technologies. However, the ACT and HDO rules, as currently structured, present significant challenges that could undermine business growth and job stability, particularly for small and mid-sized enterprises.

Key concerns include:

- **Lack of Infrastructure:** Our region lacks the charging and maintenance infrastructure necessary to support rapid fleet transitions. Without this foundational support, compliance timelines are unrealistic and will penalize operators who have no viable alternatives.
- **Technology Availability:** Zero-emission medium- and heavy-duty vehicles are still limited in availability and application, particularly for rural and industrial uses. Businesses have reported long lead times, limited vehicle options, and uncertain maintenance support.
- **Cost Barriers:** The upfront cost of compliant vehicles remains out of reach for many businesses—especially small operators and family-run fleets. Even with incentives, the capital investment required is substantial and could result in disinvestment or downsizing.

We urge the DEQ to weigh the economic and operational impacts alongside environmental benefits, and to consider a phased, flexible implementation strategy that accounts for infrastructure readiness and technology availability. Oregon's business community is not opposed to cleaner transportation—but the timeline must be grounded in market and supply chain realities.

We appreciate your consideration and remain available to share more feedback from local businesses navigating this transition.

Sincerely,

A handwritten signature in black ink, appearing to read 'V. Mikkelsen', with a stylized flourish at the end.

Vonnie Mikkelsen  
President and CEO  
Springfield Area Chamber of Commerce