

Electronic Filing: Received, Clerk's Office 03/03/2025
BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
IN THE MATTER OF:
PROPOSED CLEAN CAR AND TRUCK STANDARDS
R2024-017
(Rulemaking – Air)

**Mid-West Truckers Association, Inc. - Illinois Pollution Control Board Response to Pre
Filed Questions**

Matt Wells, Vice President

**I. Question Directed to all Witnesses – Is it Participants’ position that market
forces and other rebate and incentive programs would not contribute
significantly to the ZEV mandate requirements of the proposed rule? If so, why?**

Yes. For commercial trucks, the marketplace is not limited by state borders. The marketplace for commercial carriers is the entirety of the United States. Due to the high capital costs associated with commercial trucks, grant programs will not create enough energy to contain the current truck market demands in Illinois. Since manufacturers are not required to meet the same ZEV standards across all states; the market will shift to states that are able to provide ICE vehicles which are significantly lower in cost to purchase, operate, and maintain. The reality of private grants like ComEd making a significant impact on commercial trucking operations to switch to electric would need to be 1,000 times greater than the \$53M being offered. To be successful Illinois is going to have to invest significant amounts of money into Illinois EPA. California has been investing and building CARB for over 50 years, investing over 1 billion dollars every year to ensure making its CARB regulations successful. Is the Pollution Control Board prepared to create rules that require millions, if not hundreds of millions of taxpayer dollars to manage successfully? None of the proposed rules have any allocated funding mechanisms to ensure sustainability and success. Where is that money going to come from?

<https://ww2.arb.ca.gov/news>

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<https://ww2.arb.ca.gov/our-work/topics/incentives>

<https://lao.ca.gov/Publications/Report/4980#:~:text=Budget%20Overview.&text=This%20represents%20a%20net%20reduction,Sections%204.05%20and%204.12%5D>).

II. Question 4. Please comment on how the Illinois out of state based carriers percent miles traveled compares with that of California?

I have requested this information, but due to the very small amount of time required to respond to pre filed questions, I have not received a response from my information source. I hope to provide you with this information during my testimony time March 10th.

III. Question 5.

a. a. Please provide a citation to the CARB commercial truck regulations that prohibit out-of-state, non-compliant vehicles from entering California.

The Truck and Bus Regulation adopted in 2008 requires all commercial vehicles to be model year 2010 or vehicle must be retrofitted with 2010 or new compliant emissions equipment to operate in the state. See <https://ww2.arb.ca.gov/our-work/programs/truck-and-bus-regulation>

b. Additionally, if any case has been filed challenging these specific CARB commercial truck regulations, please provide the case name, case or docket number, court, when the case was filed, and the current status (e.g., whether the case is still pending or has been resolved).

There have been many cases filed against the Carb commercial truck regulations. All cases filed against CARB can be found at: <https://ww2.arb.ca.gov/current-litigation>

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IV. Question 6. Pertaining to “Clean Truck Check”

- a. Please clarify whether diesel trucks would be able to continue operating in California if the vehicle’s onboard diagnostic system (OBD) indicates compliance with separate emissions standard.**

Adopting “Clean Truck Check” regulations is not part of the proposed rules for R2024-017. I will comment that we cannot just adopt one section of rules. The ‘Clean Truck Check’ rules build upon previously adopted rules in California that include prohibiting truck registration if the vehicle did not meet specific emission requirements.

- b. If similar requirements are adopted in Illinois, please comment on whether Illinois companies “will have to outsource” transportation service to other states.**

The requirements of “Clean Truck Check” are not part of the rules that are being proposed in R2024-017; thus I cannot speak to whether Illinois companies will have to outsource transportation services to companies that are domiciled in other states. If I have misread your question, I will try to answer during testimony if the question is rephrased.

- c. Also, please comment on whether public entities such as school districts will be forced to out-source transportation.**

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The requirements of “Clean Truck Check’ are not part of the rules that are being proposed in R2024-017; thus I cannot speak to whether Illinois schools will have to outsource transportation services. If I have misread your question, I will try to answer during testimony if the question is rephrased.