

DATE: December 2, 2024
TO: Illinois Pollution Control Board
SUBJECT: Support for Advanced Clean Trucks Rule, Heavy Duty Omnibus Rule
and Advanced Clean Cars II Regulations
FROM: Tim Milburn, Green Ways 2Go, LLC

This memo is to ask for your support on the subject pending legislative actions. A deployment plan for Illinois clean vehicles is needed to ensure success in our efforts to mitigate climate change and adverse health impacts of vehicle emissions.

My company, Green Ways 2 Go, consults on turnkey Electric Vehicle (EV) charging infrastructure projects for public and commercial organizations and multiple family dwellings. I am the Program Advisor for the Metropolitan Mayors Caucus' EV Readiness program and am on the Board of Directors of Illinois Alliance for Clean Transportation (IACT). I have been an active volunteer in Illinois Sierra Club in clean transportation and clean energy for 10 years.

I regularly speak to many public and private operations about medium and heavy-duty truck electrification. While many organizations are keen to add EVs to their fleets, the three main reasons they are slow to do so are vehicle and infrastructure costs, operational changes and EV model availability. These organizations recognize the significant climate, sustainability, health, and quality of life impacts related to fossil fuel use. Many are very interested in reducing the negative respiratory, neurological, cancer and cardiovascular outcomes from combustion of fossil fuels and the impact of CO₂ emissions on climate. Most also share the concern about the disproportionate impacts on disadvantaged communities. In short, most of these organizations get it? want to electrify their vehicles? but until more supporting policies are in place in Illinois? these decisions continue to get pushed out in time.

Like all the green tech markets, jump start policies are required. Since the main drivers for change are climate change mitigation and human health, setting progressive emissions targets is a critical starting point. New rules driving zero or low emissions are needed for the larger vehicles, such as the Advanced Clean Trucks Rule and the Heavy-Duty Omnibus Low NO_x Rule. From there, supporting policies to stimulate sales of larger Electric Vehicles must be initiated, including suitable vehicle, infrastructure and energy incentives and educational programs. Setting tighter emissions goals for internal combustion engine vehicles (ICEVs) is also part of the solution, per the Advanced Clean Cars II policies.

Since 2021, with Illinois' CEJA programs along with Inflation Reduction Act and the Bipartisan Infrastructure Law being deployed, the passenger vehicle, supporting infrastructure and energy markets have been provided with an appropriate set of policies and incentives that are working. Over time, EV costs are coming down, soon to reach cost parity with internal combustion engines, when incentives become unneeded. People quickly adapt to EVs and often prefer them to ICEVs.

This cycle needs to now start for the larger vehicles that produce much higher pollution and GHGs per mile than passenger vehicles. By incentivizing, the manufacturing companies can grow the currently inadequate supply chain and perhaps produce products or components in Illinois, including the jobs and revenues that come with new manufacturing.

Thank you,
Timothy J. Milburn
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