

Testimony of Matthew Hart
Executive Director, Illinois Trucking Association
Before the Illinois Pollution Control Board

Re: Proposed Clean Car and Truck Standards: Proposed 35 ILL. ADM. CODE 242 (Proposed new Part 242)

Madam Chair Currie and Members of the Board,

Thank you for the opportunity to testify on behalf of the Illinois Trucking Association. My name is Matthew Hart, and I am the Executive Director of the Illinois Trucking Association. We are a non-profit trade association, and we are the Illinois-affiliate of the American Trucking Associations, a nationwide federation of trucking companies with affiliates in all 50 states. Our federation represents 35,000 member companies before the legislative, regulatory, and judiciary branches of state and federal government.

Have you ever tried to jump onto a moving train?

I'm not talking about a train that has just started to move or a train that is crawling along. No, have you ever tried to jump onto a moving train that is well on its way and is cruising along? Would it be wise to jump onto a moving train? Of course not.

This proposal before you attempts to do just that: to jump onto a moving train, someone else's train, that left the station long ago. A train that may not even be headed in the right direction.

We all share the goal of reducing emissions, but there are many different pathways to achieve the goal of reduced emissions and maintaining a clean environment for the citizens of Illinois.

This proposal is simply not the right pathway; this is someone else's pathway and it's too late to jump onto this moving train. This proposal will do more harm than good, and it is not necessary to achieve our shared goal of lowering emissions.

The trucking industry is proud of our record of reducing emissions: a goal that we have achieved WITHOUT mandates like what is proposed. Again, we have the same goal, but there are many pathways to achieving this goal.

Today, I will explain why this proposal will not improve the environment, how it will hurt Illinois citizens, why the issue should be debated with full transparency, and how the trucking industry has already made amazing progress in reducing emissions WITHOUT mandates like this proposal.

The Illinois Trucking Association, in cooperation with our American Trucking Associations federation, stand in strong opposition to the proposal and we ask that you deny the petition for the proposed regulation and let Illinois set its own pathway to environmental and economic success.

1. The Proposed Standards Will Not Improve the Environment

The stated purpose of these regulations is to reduce emissions and improve air quality, but they will fail to achieve this goal due to the unique nature of Illinois' geography and economy:

- **Exemption of Out-of-State Trucks and Out-of-State Companies:** The proposed regulation applies only to vehicles sold within Illinois. However, trucks registered and sold in neighboring states—such as Indiana, Missouri, and Wisconsin—would not be subject to these rules. Illinois sits at the heart of the nation's transportation network, and many trucks operating on Illinois roads are owned by out-of-state companies. These trucks, exempt from the regulations, will continue operating within Illinois, negating any environmental benefit.
- **Geographic Limitations:** Illinois' role as a hub of interstate commerce means we cannot control the types of vehicles crossing our borders. This regulation does not affect trucking companies based out of Indiana, Wisconsin, or Missouri, yet those trucks will continue operating here every day. The emissions will remain. The only change will be that out of state trucking companies will deliver the same goods that our citizens need.

2. The Proposed Standards Will Harm Illinois Citizens

These regulations would impose severe economic and operational hardships on Illinois businesses, workers, and residents:

- **Unrealistic Compliance Timeline:** California has had over a decade to prepare for its Advanced Clean Truck (ACT) rules and to build a credit system that rewards early compliance. Illinois, by contrast, is being asked to meet ambitious targets with no preparation period. For instance, Illinois would need to achieve at least 20% electric truck sales by 2028 when there are virtually zero electric trucks available for sale in the state today. As of today, there are 355,000 interstate trucks registered in Illinois¹ and another 216,000 intrastate trucks registered here². Of the 571,000 trucks registered in this state, there were 272 new Electric Trucks registered in Illinois in 2024³. That's 0.05% of all trucks. Jumping to 20% Electric Truck Sales in less than two years as this regulation would require is simply not possible.
- **Truck Charging Infrastructure Does Not Exist and Can Take Up to 9 Years:** While Illinois has been building out car charging infrastructure, truck charging infrastructure in Illinois does not exist beyond a handful of private companies. In addition, fueling an electric truck requires much higher amounts of electricity than charging a car, which requires major upgrades to the current grid. In California, where they have been preparing for electric vehicles, it currently takes 2.5+ years for circuits, over 4 years for substation upgrades, and nearly 9 years for new substations that can handle truck charging⁴.
- **Illinois Truck Retailers Would Be Harmed:** Electric trucks are simply not available for sale in Illinois. And when they are available, Illinois truck retailers would be forced to sell vehicles that are more expensive and less practical due to a lack of charging or fueling infrastructure. And we are not talking about electric trucks costing a few dollars more than diesel powered trucks. Electric trucks today cost \$450,000, compared to a new comparable diesel truck that costs \$150,000. Retailers in neighboring states would not face these challenges, creating an uneven playing field that would drive businesses and jobs out of Illinois.
- **Increased Congestion and Emissions:** Electric trucks, due to the weight of their batteries, have reduced payload capacities. Studies from the American Transportation Research Institute show that meeting the same freight demands with electric trucks could require as much

as 34.3% more vehicles on the road⁵. In congested areas like Chicagoland, a 34% increase in trucks would exacerbate traffic problems and could even worsen air quality.

- **Infrastructure Costs:** Transitioning to zero-emission trucks would require a massive investment in infrastructure. Nationally, this transition is projected to cost \$1 trillion, with Illinois' share estimated at \$36 billion⁶. This equates to an unfunded mandate of nearly \$2,800 for every man, woman, and child in Illinois—an unsustainable burden on taxpayers.

- **Policy Inconsistency:** Governor J.B. Pritzker has expressed a preference for a “carrot over stick” approach to emissions reduction⁷. The adoption of this mandate directly conflicts with that approach, forcing a burdensome and punitive regulation on businesses without the necessary support or incentives to achieve compliance.

3. This Issue Should Be Debated with Public Input

The proposed standards represent a significant policy shift that warrants a thorough and transparent legislative process. We sincerely appreciate the Illinois Pollution Control Board and all of their hard work on this proposal; however, this proposal will have an impact far beyond pollution. This proposal affects our state, national, and international supply chain. This proposal affects the industry that transports 95% of the manufactured freight in Illinois. Therefore, we believe that such a proposal needs to have additional transparency and input.

- **Public Accountability:** We believe that the Illinois General Assembly is the appropriate forum for debating and enacting such sweeping regulations. The legislative process allows for public input, stakeholder engagement, and rigorous analysis of the health, economic, and environmental impacts.

- **Executive Oversight:** The General Assembly ensures that the governor and the public have a voice in shaping such critical policies. This regulation, however, bypasses the democratic process and imposes rules without the necessary scrutiny or debate.

4. The Trucking Industry Has Already Made Significant Environmental Progress and Incentives (Not Mandates) Are Working

The trucking industry is a leader in reducing emissions, and we have achieved these results without heavy-handed government mandates:

- **Dramatic Emission Reductions:** Over the past few decades, we have reduced particulate matter (PM) and nitrogen oxide (NOx) emissions by more than 98%. These reductions have been achieved through advancements in diesel engine technology, cleaner fuels, and improved vehicle efficiency, not through mandates.

- **Reduction in Carbon Dioxide (CO2):** Through fuel economy improvements, CO2 emissions from new trucks have been reduced by nearly 50% over the past 15 years without mandates for electric trucks⁸.

- **Market-Driven Innovation:** The trucking industry continues to adopt cleaner technologies and improve efficiency because it makes economic sense—not because of punitive regulations. Forcing premature adoption of zero-emission vehicles risks stifling this positive progress.

Conclusion

The proposed Clean Car and Truck Standards will fail to achieve their environmental goals, harm Illinois businesses and citizens, and ignore the trucking industry's proven track record of reducing emissions.

Illinois can and should pursue balanced, practical solutions that protect the environment while supporting our economy. Illinois should be a leader on economic and environmental issues. We should not be attempting to jump onto someone else's train that has already left the station.

We urge the Illinois Pollution Control Board to reject these standards and work collaboratively with stakeholders to develop policies that are achievable, effective, and fair.

Thank you for your time and consideration. I am happy to answer any questions.

Sincerely,

A handwritten signature in blue ink that reads "Matthew W. Hart". The signature is fluid and cursive, with the first name "Matthew" being the most prominent.

Matthew Hart
Executive Director
Illinois Trucking Association

¹ FMCSA <https://ai.fmcsa.dot.gov/RegistrationStatistics/CustomReports>

² ILSOS <https://www.ilsos.gov/departments/vehicles/statistics/activerereg/2025/activerereg011725.pdf>

³ ATP/S&P Global Mobility, 2024 Data through November

⁴ California Public Utilities Commission, Order Instituting Rulemaking to Establish Energization Timelines, Rulemaking 24-01-018, Proposed Decision (9/12/2024)

⁵ American Transportation Research Institute

⁶ Clean Freight Coalition

⁷ https://www.farmweeknow.com/policy/state/pritzker-opposes-adoption-of-californias-emission-rules/article_f0345620-d71a-11ee-8310-8f5eb9a55192.html

⁸ EPA Phase 1 and 2 Regulations for Greenhouse Gas Emissions