



Owner-Operator Independent Drivers Association

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March 10, 2025

Don Brown
Clerk of the Board
Illinois Pollution Control Board
60 E. Van Buren Street, Suite 630
Chicago, IL 60605

Re: Case # R2024-017PC, "Proposed Clean Car and Truck Standards"

Dear Clerk Brown,

The Owner-Operator Independent Drivers Association (OOIDA) is the largest trade association representing the views of small-business truckers and professional truck drivers. OOIDA has approximately 150,000 members located in all fifty states, including 5,400 in Illinois. OOIDA's mission is to promote and protect the interests of its members on any issues that might impact their economic well-being, working conditions, and the safe operation of commercial motor vehicles (CMVs) on our nation's highways.

Clean air is a priority for everyone, including truckers, but emissions requirements for heavy-duty trucks should be practical, affordable, and reliable. This has not been the case with California Air Resources Board (CARB) regulations such as the Advanced Clean Trucks (ACT) rule and the Heavy-Duty Low NOx Omnibus rule.

OOIDA members have raised questions about ACT's intent to eliminate internal combustion engine vehicles and restrict their sales. ACT would establish a set of unworkable and unaffordable emissions rules for Illinois small businesses. Additionally, purchasing zero emissions heavy-duty vehicles (ZEV) is challenging for motor carriers in the absence of national and regional charging infrastructure networks. Professional drivers are skeptical of ZEV costs, mileage range, electric battery weight and safety, charging time, and availability. These are all factors that must be addressed before phasing out diesel-engine production.

In recent years, the trucking industry has been subjected to numerous federal and state regulations relating to environmental emissions. Some of these standards were necessary and have been helpful in reducing NOx vehicle emissions by as much as 98%. However, many were short-sighted and have been difficult to implement, especially for smaller motor carriers. The influx of regulations has contributed to higher costs for new trucks with the average price

increasing almost 52 percent since 2001.¹ Meanwhile, the cost of used trucks has remained relatively the same. In some cases, these dramatic cost increases can limit the environmental benefits of the regulations by forcing truckers to maintain older vehicles longer than they otherwise would or compelling truckers to purchase used vehicles. On average, OOIDA members have stated that emissions and environmental equipment represented approximately \$3,000 of their annual maintenance costs.² Only 36 percent of OOIDA members indicated they got a return on investment for installing and using environmental/emissions technologies such as exhaust gas recirculation (EGR) / selective catalytic reduction (SCR) systems and diesel particulate filters (DPF).³ For small carriers operating on the slimmest of margins, these costs can be a major deterrent to purchasing newer, cleaner trucks.

Hefty maintenance expenses, coupled with the loss of income resulting from downed trucks, can severely jeopardize small-business viability. OOIDA members have encountered various problems with emissions systems which have had a dramatic impact on their business. These challenges include expensive visits to dealers, lost productivity, poor efficiency, and towing costs when the equipment fails. Some OOIDA members have also experienced emission technology failures that caused their engines to quickly derate, placing truckers and other motorists in unsafe situations. Illinois laws must ensure that drivers who are purchasing new equipment are getting a fair deal and will not be constantly sidelined from their profession due to costly, repeated breakdowns

Small-business truckers and owner-operators should not be used as trial cases for new technologies, while getting priced out of business in the process. We believe there is a more realistic path forward to reducing commercial vehicle emissions that involves listening to the men and women of the trucking industry. Illinois should continue seeking feedback from these stakeholders as the Pollution Control Board considers any potential new emissions rules. Truckers know all too well that poorly implemented regulations will result in breakdowns, downtime, and ultimately set back the goal of achieving cleaner air.

Thank you,



Todd Spencer
President & CEO
Owner-Operator Independent Drivers Association, Inc.

¹ *Owner-Operator Member Profile Survey 2022*, OOIDA Foundation (2022).

² *Ibid.*

³ *Ibid.*

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From: [Doug Morris](#)
To: [Brown, Don](#)
Subject: [External] Reference Case # R2024-017PC - Proposed Clean Car and Truck Standards
Date: Monday, March 10, 2025 3:40:15 PM
Attachments: [Illinois Pollution Control Board R2024-017PC - OOIDA Comments.pdf](#)

See attached comments for submission to the docket.

Thank You in advance

Doug Morris

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