Post-Hearing Comments on Proposed Clean Car and Truck Standards: Proposed 35 ILL. ADM. CODE 242

Illinois Pollution Control Board Docket Number R24-17

Submitted by Matthew Hart, Executive Director, Illinois Trucking Association

The Illinois Trucking Association opposes the proposed mandate for electric trucks in Illinois under Docket Number R24-27. While we support efforts to reduce emissions, this proposal is not the right solution for Illinois. It will not meaningfully improve air quality due to the high volume of out-of-state trucks that are not covered by the proposed regulation.

At the same time, the rule imposes unrealistic deadlines, enormous costs, and infrastructure challenges on Illinois businesses. These burdens will lead to job losses, higher operating costs, and reduced competitiveness for Illinois companies: especially small and mid-sized businesses. The result will be a negative ripple effect across the state's economy, including higher prices for consumers, disruptions in the supply chain, and a potential shift of jobs and investment to neighboring states that do not impose similar mandates.

The proposed rule will have a negative impact on nearly every industry, including but not limited to transportation, agriculture, manufacturing, construction, retail, communications, education, and energy. Furthermore, the proposed rule will adversely affect any business that relies upon commercial vehicles to safely deliver goods and services and it will increase costs to vehicles and to the maintenance of vehicles.

Therefore, we urge the Illinois Pollution Control Board to reject this proposal and instead work with industry and stakeholders to find a more practical, achievable, and economically responsible path forward.