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May 16, 2025

Illinois Pollution Control Board
c/o Don Brown, Clerk of the Board
60 E Van Buren St, Suite 630
Chicago, IL 60605

Re: Proposed Clean Car and Truck Standards: Proposed 35 ILL. ADM. CODE 242 (Proposed new Part 242) / Case# R24-17

Dear Madam Chair Currie and Members of the Board,

In response to the comment previously submitted by the Illinois Trucking Association on April 23, the Illinois Trucking Association (ITA) appreciates the opportunity to submit these post-hearing comments regarding the proposed Clean Car and Truck Standards under 35 ILL. ADM. CODE 242. The Illinois Trucking Association also notes the testimony of our national affiliate, the American Trucking Associations, which was filed on May 16, 2025.

As previously stated, ITA represents a broad coalition of trucking companies that are integral to Illinois' economy and supply chain. While we support efforts to reduce emissions and promote environmental sustainability, we have significant concerns about the proposed regulations' feasibility, economic impact, and alignment with federal legislative actions.

We stand by our initial testimony filed in January that carefully explains how the proposed standards will not improve the environment, how Illinois citizens would be harmed by this proposal, and how the trucking industry has already made dramatic reductions in emissions without the need for mandates like those proposed.

The Illinois Trucking Association also notes the comments of both the American Trucking Associations on 5/16/25 as well as the Truck and Engine Manufacturers Association on 4/28/25 noting that Advanced Clean Truck (ACT) Requirements are simply unachievable in Illinois.

In addition to our initial comments, we urge you to reject the proposal due to further developments as well.

I. Federal Legislative Actions Underscore the Need for Caution

Recent actions by the U.S. Congress highlight substantial federal opposition to regulations similar to those proposed in Illinois. Specifically, the House of Representatives has passed the following joint resolutions:

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- H.J.Res.87: Disapproving the rule submitted by the Environmental Protection Agency relating to “California State Motor Vehicle and Engine Pollution Control Standards; Advanced Clean Cars II; Waiver of Preemption; Notice of Decision.”
- H.J.Res.88: Disapproving the rule submitted by the Environmental Protection Agency relating to “California State Motor Vehicle and Engine Pollution Control Standards; Heavy-Duty Vehicle and Engine Emission Warranty and Maintenance Provisions; Advanced Clean Trucks; Zero Emission Airport Shuttle; Zero-Emission Power Train Certification; Waiver of Preemption; Notice of Decision.”
- H.J.Res.89: Disapproving the rule submitted by the Environmental Protection Agency relating to “California State Motor Vehicle and Engine Pollution Control Standards; Heavy-Duty Vehicle and Engine Emission Warranty and Maintenance Provisions; Advanced Clean Trucks; Zero Emission Airport Shuttle; Zero-Emission Power Train Certification; Waiver of Preemption; Notice of Decision.”

Furthermore, the U.S. Senate is scheduled to vote next week on corresponding resolutions:

- S.J.Res.45: Providing for congressional disapproval of the EPA’s rule relating to “California State Motor Vehicle and Engine Pollution Control Standards; Advanced Clean Cars II; Waiver of Preemption; Notice of Decision.”
- S.J.Res.46: Providing for congressional disapproval of the EPA’s rule relating to “California State Motor Vehicle and Engine Pollution Control Standards; Heavy-Duty Vehicle and Engine Emission Warranty and Maintenance Provisions; Advanced Clean Trucks; Zero Emission Airport Shuttle; Zero-Emission Power Train Certification; Waiver of Preemption; Notice of Decision.”
- S.J.Res.47: Providing for congressional disapproval of the EPA’s rule relating to “California State Motor Vehicle and Engine Pollution Control Standards; Heavy-Duty Vehicle and Engine Emission Warranty and Maintenance Provisions; Advanced Clean Trucks; Zero Emission Airport Shuttle; Zero-Emission Power Train Certification; Waiver of Preemption; Notice of Decision.”

These legislative actions reflect a clear federal intent to prevent the implementation of regulations that mirror California’s standards, which the proposed Illinois rule seeks to adopt. Implementing such standards in Illinois could place the state in direct conflict with federal policy, leading to legal challenges and regulatory uncertainty.

II. Lack of Implementation in Other States

Notably, no state that has adopted regulations similar to the proposed Clean Car and Truck Standards is currently implementing or enforcing such measures. States like California, which pioneered these standards, have faced significant challenges in infrastructure development, vehicle availability, and economic impact assessments, leading to delays and reconsiderations of enforcement timelines. Illinois

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should learn from these experiences and avoid premature adoption of regulations that are not yet viable in practice.

III. Economic Impact on Illinois

The proposed regulations would have a detrimental effect on Illinois' economy, particularly in the transportation and logistics sectors. Illinois serves as a critical hub for interstate commerce, and the trucking industry is a cornerstone of the state's economic infrastructure. Imposing stringent vehicle standards could lead to increased operational costs, reduced competitiveness, and potential job losses. Moreover, the lack of necessary charging infrastructure and the high cost of electric trucks—currently averaging \$450,000 compared to \$150,000 for diesel counterparts—would place an undue financial burden on trucking companies, especially small and medium-sized enterprises.

IV. Conclusion

While the goal of reducing emissions is commendable, the proposed Clean Car and Truck Standards under 35 ILL. ADM. CODE 242 are premature and misaligned with current federal legislative actions and practical implementation realities. Adopting these standards could lead to significant economic harm for Illinois and place the state at odds with federal policy. The Illinois Trucking Association urges the Illinois Pollution Control Board to deny the petition for the proposed regulations and engage in a more comprehensive analysis that includes stakeholder input and economic impact assessments.

Respectfully submitted,

A handwritten signature in blue ink that reads "Matthew W. Hart". The signature is fluid and cursive.

Matthew W. Hart
Executive Director
Illinois Trucking Association