

Electronic Filing: Received, Clerk's Office 01/21/2025
BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
IN THE MATTER OF:
PROPOSED CLEAN CAR AND TRUCK STANDARDS
R2024-017
(Rulemaking – Air)

Mid-West Truckers Association, Inc. - Illinois Pollution Control Board Testimony

Matt Wells, Vice President

I. INTRODUCTION

Mid-West Truckers Association represents over 4,300 trucking companies and entities that operate commercial motor vehicles in Illinois and 16 surrounding states. Created in 1961, Mid-West Truckers Association, Inc. had consistently represented the commercial vehicle industry in Illinois for over 64 years to legislative and regulatory bodies in Illinois. Our membership includes trucking companies, logistics companies, farmers, private businesses that operate commercial vehicles, school transportation, municipalities, townships and much more. We strive to provide a strong voice to the commercial vehicle community in Illinois.

Testimony for the organization is provided by Matt Wells, Vice-President of Mid-West Truckers Association, Inc. (MTA). Matt has been a registered Illinois Lobbyist for MTA since 2011 and served in the role as Associate Director and Vice-President for 14 years. Matt has maintained a class A Illinois commercial driver's license since the age of 19 years old and advocates for the industry in legislative and regulatory matters. Prior to working for MTA, Matt served as the executive director of Automotive Parts and Service Association of Illinois and prior to that was member director of the Grain and Feed Association of Illinois. Matt brings to this testimony over 24 years of experience representing business organizations in Illinois.

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II. PURPOSE OF TESTIMONY

Today this testimony will include several factors that substantially impact the practical application of the proposed rule making and the desired outcomes of implementation. While it is convenient to think that mandating the sale of ZEV's (Zero emission Vehicles) in Illinois will result in outcomes like California. The issue is more complex than just mandating the sale of vehicles in Illinois and following California regulations. The testimony herein is to provide industry insight to the complexity of the issues this type of rulemaking will create. MTA considers the magnitude of negative implications of enacting ACC II (Advance Clean Cars II), Low NOx, and ACT (Advance Clean Truck) rules in Illinois greatly outweighs the benefits of following the Federal EPA standards applied universal across all the United States. Much of this testimony will address the Low Nox and ACT rules. The industry is happy to do its part in addressing climate change and has complied with the Federal EPA to meet the goals and national standards for air quality.

III. LOW NO_x RULE & ADVANCE CLEAN TRUCKS RULE

Illinois is home to over 24 Interstates Highway covering over ¹5,000 miles. The state itself is considered the crossroads of the nation² as stated by President Barack Obama in his keynote address of the 2004 Democratic National Convention. Only three east-west interstates in the nation, Interstate 10, Interstate 20 and Interstate 40 do not pass through Illinois. All other east-west interstates travel through and feed into Interstates in Illinois. The major north-south

¹ <https://www.fhwa.dot.gov/policyinformation/statistics/2008/hm60.cfm>

² <https://www.presidency.ucsb.edu/documents/keynote-address-the-2004-democratic-national-convention>

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interstates intersecting in Illinois creates the ‘crossroad’ reference. As such, logistic navigation of the United States requires out of state vehicles, specifically commercial vehicles, will travel through Illinois.

In data requested from Illinois Department of Revenue division of Alcohol, Tobacco and Fuel we found that 4.9 billion of the 7 billion miles reported to International Fuel Tax Association (IFTA) in Illinois last year were done by vehicles not based in Illinois. Actually, of the last three years that include 2022, 2023 and 2024, out-of-state based carriers recorded more than 68% of the miles traveled in Illinois.³ The significance of this fact is that even if another 1 billion miles is factored in for commercial vehicles that do not report mileage to IFTA; the number of miles driven in Illinois by Illinois based commercial vehicles is significantly less than carriers not based in Illinois where this rule would apply if adopted.

Economically, adoption of Low NOx and ACT in Illinois will create a significant increase on the number of out-of-state carriers that will be operating in Illinois. If Illinois enacts both rules, Illinois commercial truck operators will be at a competitive disadvantage to out of state carriers not subject to the regulations. Since out of state commercial vehicle operators are not banned from entering and doing business in Illinois, they will have a competitive advantage over Illinois based operators. This will only continue to grow as the sale of ZEV commercial vehicles to Illinois operators increases under the ACT.

³ Email from Illinois Department of Revenue 1/13/2025 Kathleen Blessing Alcohol, Tobacco and Fuel Division manager (included as support document)

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Unlike California, Illinois cannot close its borders to non-compliant vehicles to keep them from entering the state. Unknown to the common individual is that California Air Resources Board (CARB) has commercial truck regulations that prohibit out of state non-compliant vehicles from entering California⁴. This allows California to significantly improve the impacts of regulations like the Low NOx and ACT. Geographically Illinois is not going to be able to prohibit the flow of non-Illinois based carriers from traveling across or into Illinois. Economically and logistically the Illinois EPA does not have the funding or manpower to implement such operations to achieve the stated impacts that proponents of the rule are acknowledging.

Thus, if these rules are enacted, Illinois companies that currently operate commercial vehicles will outsource transportation services from non-Illinois companies. This includes small and large businesses that operate commercial motor vehicles. For companies to remain competitive with out-of-state business, will have to outsource their transportation solutions. While proponents like to talk about total cost of ownership (TCO) of ZEV's is less than the fossil fuel equivalent, the cash flow impact of having to invest all the TCO for ZEV upfront is not feasible for most companies. Range, charging and ZEV availability addresses by other's testimony are all factors in business decisions if Illinois companies are forced to comply with Low NOx and ACT.

Schools, municipalities, and local governments all have limited resources to provide mandated services to Illinois citizens. Unless subsidized by local property tax increases or state income

⁴ <https://www.truckinginfo.com/10211498/proof-of-carb-clean-truck-check-compliance-needed-jan-1>

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taxes, these forms of local government will be forced to outsource transportation and fleet services to out of state companies that can provide affordable, fossil fuel commercial vehicles.

Every Illinois based for-hire transportation, and logistic company is within 150 miles of another state that does not have Low NOx and ACT rules in their state. This will place Illinois for-hire transportation companies at a competitive disadvantage to non-Illinois based carriers. Facing the same dilemma noted above, these Illinois based for-hire carriers will move their commercial truck purchases out of the state if Illinois.

CONCLUSION

California has already started to back away from the aggressive and non-compromising approach to ZEV implementation. As of January 16th, California withdrew its waiver request for Advance Clean Fleet (ACF) regulations from United State EPA⁵. While citing a confrontation with the incoming Trump Administration, the realities are the electric commercial truck supply market is not going to be able to support such a sweeping and aggressive regulation of ACF. The market is struggling to provide trucks for the state of California currently, let alone the four other states set to implement ACT in 2026.

Illinois Governor Pritzker has stated publicly multiple times that he does not favor mandates and regulations to achieve environmental goals for Illinois but prefers to incentivize attaining environmental goals⁶. Adopting these regulations goes against every statement Governor Pritzker

⁵ <https://www.sidley.com/en/insights/newsupdates/2025/01/california-withdraws-epa-waiver-request-for-advanced-clean-fleets-regulations>

⁶ <https://capitolfax.com/2024/02/27/pritzker-restates-longtime-opposition-to-california-style-mandated-zero-emissions-standards-saying-he-prefers-carrots-over-sticks-at-least-for-now/>

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has made about achieving improved environmental goals in Illinois. None of the three rules being asked of the Illinois Pollution Control Board incentivizes or promotes voluntary incorporation of ZEV's into the marketplace.

Illinois is not California, nor should we assume that regulations created by a state geographically and environmentally different from Illinois should dictate the purchase of ZEV's for Illinoisans.

President Trump issued executive order “Unleashing American Energy”⁷ that specifically addresses the regulations being considered under R2024-17 on January 20th, 2025. This uncertainty challenges the reality of providing Illinois with proposed environmental relief claimed by proponents.

Illinois commercial truck operators are willing and have always approached the table to negotiate our part of improving Illinois environmental air quality. For the reasons above, I urge the Illinois Pollution Control board to not adopt R2024-17. Thank you for the opportunity to testify and I welcome the opportunity to answer any questions.

⁷ <https://www.whitehouse.gov/presidential-actions/2025/01/unleashing-american-energy/>

Matt Wells

From: Blessing, Kathleen <Kathleen.Blessing@Illinois.gov>
Sent: Monday, January 13, 2025 3:16 PM
To: Matt Wells
Subject: Mileage

Warning: Unusual sender <kathleen.blessing@illinois.gov>

You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

Hi Matt,

I was able to extract numbers from a distance report. The year in the table references when the mileage was transmitted to IFTA, Inc. based on mileage reported on the IFTA quarterly returns.

The mileage reported and transmitted are divided by the IL based IFTA carriers' reported Illinois miles and other jurisdiction based IFTA carriers' reported Illinois miles.

ILLINOIS MILEAGE TOTALS			
Year mileage data was transmitted	IL Based IFTA Carriers	Other Based IFTA Carriers	Grand Total
2022	2,261,229,205	4,910,527,963	7,171,757,168
2023	2,153,100,467	4,774,150,316	6,927,250,783
2024	2,182,205,157	4,787,397,718	6,969,602,875

I hope this helps. If you have questions, let me know.

Regards,

Kathleen Blessing - Alcohol, Tobacco, and Fuel Division Manager

Illinois Department of Revenue
101 W. Jefferson MC 2-263
Springfield, IL 62702
(217) 782-6909

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