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IL CORN GROWERS ASSOCIATION

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DATE: February 20, 2024

TO: Illinois House Energy and Environment Committee

FROM: Dave Rylander, President, IL Corn Growers Association

RE: House Bill 1634, amending the Vehicle Emissions Inspection Law of 2005 of the Illinois Vehicle Code

The IL Corn Growers Association opposes House Bill 1634. Primarily, we believe it is bad policy to allow another state – in this case, California – to write laws for the citizens of Illinois. Illinoisans deserve to have policies reviewed and debated by elected officials who represent them, not by those that live in and represent citizens of other states.

California is very different from Illinois.

1. Illinois would have to invest millions of dollars to meet the same level of charging availability that California has in place now.
2. California and Illinois do not have similar climates; citizens in northern Illinois will be significantly impacted in cold winters when BEVs cannot perform, as we have seen in early 2024.
3. Illinois roads experience more significant decay through freezing and thawing conditions than California. In Illinois, EVs are undercharged for the maintenance of these decaying roadways.

Additionally, we are concerned about the impacts to vehicle costs, fuel prices, and consumer choice if the California Emissions Standards become Illinois law.

Specifically, we have concerns with the following programs that have already been adopted by the state of California, though not all are approved by the U.S. EPA. Does Illinois intend to adopt the programs below, before they are approved by the U.S. EPA?

- *Advanced Clean Cars II Program*: Specifies that 35% of new light duty vehicles including cars, SUV's, and pick-up trucks sold in California must be electric by 2026. By 2035, 100% must be electric.
- *California's Advanced Clean Truck Program*: Mandates that 75% of all new heavy-duty truck sales (class 4-8) and 40% of class 7 and 8 tractor sales must be zero emissions by 2035 in California.
- *California's Advanced Clean Fleets Program*: Requires new trucks sold to be zero emission starting in 2036. Requires used trucks owned by medium and large fleets must also be zero emission by 2042.

The Illinois Environmental Protection Agency must consider the following challenges and concerns before adopting rules to implement the motor vehicle emission standards of the State of California.

- Adopting California emissions standards would significantly increase the cost of vehicles to Illinois citizens. An average electric vehicle costs approximately \$10,000 more than its gasoline-powered counterpart.
- Gas prices today in California are \$4.65. In Illinois, gas prices average \$3.50.
- Diesel prices in California are \$5.41. In Illinois, diesel prices are \$4.10 - a \$1.30 difference in price.
- Zero emission vehicles do not exist. Any vehicle considered to be zero emission today, is only zero emission because of the definition of emissions (coming from a tailpipe) and because a complete lifecycle analysis has yet to be completed.
- An E85 flexible hybrid electric vehicle has approximately the same carbon footprint as a battery-powered plug-in vehicle in Illinois.
- The carbon intensity of the electricity can vary significantly in the Midwest making some of these all-electric vehicles worse than E85 vehicles.
- In Illinois, it has always been important to have consumer choice and competition for the best technologies and products. This legislation depends on California determining what is best for Illinois consumers, industries, and businesses.

Finally, while ICGA is very concerned for our state as a whole, we remain extremely concerned for the people in Illinois that inhabit our rural communities. As already mentioned, these people do not have access to charging infrastructure, and the thought that the infrastructure will come in time is obtuse. This legislation drives all auto dealerships, but especially smaller, rural auto dealerships, out of business. Rural communities need every available business to remain viable.

The farmers we represent would be especially vulnerable. Illinois is a strong agricultural state. We have the second largest corn production in the nation and are number one in soybean production. About 35% of our corn production makes ethanol and we produce enough ethanol in Illinois to substitute for 40% of our petroleum fuel usage. Furthermore, the Illinois ethanol industry has pledged to become carbon neutral, using improvements in the ethanol production process and new crop management practices on our farms. Ethanol is a fuel that is cheaper than gasoline (\$0.78 per gallon less today), is grown by our local farmers, and should be a part of any solution to reduce carbon emissions in vehicles of the future.

ICGA would urge the Illinois House Energy and Environment Committee to more thoroughly consider all of the unintended consequences to a carte blanche acceptance of another state's clean energy policy. Illinois deserves to have conversation and build understanding of the impacts to all its state's citizens in a massive transportation shift such as this.