



**Illinois  
Department of Commerce  
& Economic Opportunity**

JB Pritzker, Governor

August 28, 2024

Ms. Barbara Flynn Currie  
Chair  
Illinois Pollution Control Board  
60 East VanBuren Street, Suite 630  
Chicago, IL 60605

Dear Ms. Flynn Currie:

I am in receipt of your request that the Department of Commerce and Economic Opportunity (hereafter "Department") perform an economic impact study, for Amendments to 35 Ill. Adm. Code 217. Nitrogen Oxides Emissions, Board Docket R25-17.

The Department does not have the have the industrial engineering expertise to meaningfully participate in this docket. Therefore, I respectfully decline your request for the Department to perform an economic impact study.

Additionally, it is unlikely that companies with fewer than 100 employees will be significantly impacted by the proposed amendments, as they probably do not emit the 50 tons of NOx required for regulation. Furthermore, the primary purpose of these amendments is to satisfy federal requirements under the Clean Air Act (CAA). Failure to meet these EPA requirements could lead to mandatory sanctions, including a 2:1 emission offset ratio and the state could face highway funding sanctions, which would limit federal funding for new highway projects.

Sincerely,

Isabel C Vélez Diez  
Deputy Director, Policy Development, Planning, and Research  
Illinois Department of Commerce and Economic Opportunity