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April 28, 2025

Don Brown, Clerk Illinois Pollution Control Board 60 E. Van Buren, Suite 630 Chicago, IL 60605

Re: Public Comment, R 2024-017, Proposed Clean Car and Truck Standards: Section 35 Ill. Adm, Code Part 242

Via email: don.brown@illinois.gov

To The Clerk and Hearing Officer:

Please be advised that I represent Citizens Against Ruining the Environment (CARE). CARE requested my assistance to submit public comments to contribute to Illinois Pollution Control R 2024-017, Proposed Clean Car and Truck Standards, 35 Ill. Adm Code Part 620. Specifically, CARE is submitting comments in support of the Sierra Club, NRDC, EDF, Center for Neighborhood Technology, CEJN, and Respiratory Health Associate (RHA) rulemaking proposal for standards meant to reduce emissions addressing light-, medium-, and heavy-duty (M/HD) vehicles, which will improve air quality and public health in Illinois. The present emission dangers include greenhouse gasses (GHG) like carbon dioxide (CO2), nitrogen oxides (NOX), and the air pollutant – particulate matter (PM2.5). NOx's are a class of dangerous gases that irritates lung function; PM2.5 soot particles reach deep into lungs and the blood stream to cause childhood asthma, chronic obstructive pulmonary disease, heart disease, stroke. This kills 400 Illinois each year, the 5th highest mortality rate from PM 2.5-related conditions in the country.¹ Ultimately 1 in 5 Illinoisans (2.8 million) live within a half mile of 4,300 warehouses, each generating 644,000 polluting truck trips each day.²

CARE represents people residing in Will County, Illinois, whose communities are directly impacted by transportation-related emissions. Emissions are especially intense and ever increasing in Will County, thanks to the rapidly increasing population, growing warehouse industry, and three large intermodal facilities [BNSF's Logistics Park Chicago (LPC); Union Pacific's (UP) Global IV (GLB4); and Canadian National's (CN) Joliet Terminal]³. The rising emissions from passenger vehicles and trucks in Will County present significant potential public health implications for Will County residents. CARE welcomes the more stringent standards proposed by proponents, which are consistent with the highest quality public health information and align with other states,

¹ N4EJ: Environmental Defense Fund Truck Pollution Bill – Illinois Communities Face Dangers of Truck Pollution: *Why it must be addressed*. https://mailchi.mp/42d3b58866af/truck-pollution-bill-fact-sheet?e=950b521556.

 $^{^{2}}$ Id.

³ https://willcountyced.com/site-selection/transportation-assets/

like California. These standards represent a concrete step towards seriously addressing the pressing public health issues transportation-related emissions and pollutants present. Under the current proposed standards, the rules address emission standards and may achieve over \$86 billion in net societal benefits through 2050 compared to the latest federal standards. Compared to the previous federal standards, the proposed rules will produce over \$204 billion in net benefits through 2050.

The harmful health effects of emissions in Will County are a growing public health concern. The goal of the proposed rules is to significantly enhance the control of tailpipe air pollution from passenger vehicles and trucks. This goal will be achieved by aligning IL tailpipe emission standards with the more stringent CA emission standards. This is highly relevant to air quality in Will County, IL, as the population growth and economic expansion continues. Since 2010, there has been a 3.62% population growth, leaving Will County's 2024 population at 703,410.⁴ More residents, 3 local intermodal facilities, and 370 leased warehouse complexes in Will County also mean more vehicle emissions impacting this region.⁵ Thus, the proposal's rules should lessen the impact by incentivizing transitions to electric light (passenger), M/HD vehicles, allowing IL compliance with the EPA and CEJA's ZEV adoption target within a single policy.

I. Executive Summary of Comments

CARE strongly supports adopting the proposed new standards. As further explained below, Will County is experiencing unprecedented growth in population and commercial transit through the area. The effects of this drastic, rapid increase in tailpipe emissions have the potential to lead to an air quality catastrophe in the area, with commensurate long-term health impacts on the local communities. CARE finds the evidence is persuasive that adopting the proponents' more stringent emissions standards will likely prevent this upcoming air quality disaster in Will County and in similarly-situated communities throughout the state of Illinois. Thus, CARE strongly recommends that the Board approve the three new emissions standards in this rulemaking.

II. Citizens Against Ruining The Environment

CARE is a not-for-profit Will County-based environmental education organization whose members live in several Will County communities, including Lockport and Elwood. In some cases, these residents are facing increased traffic due to population growth, the respective influx in passenger and commercial vehicles, and M-HD vehicles sharing the roadways. In other cases, these Will County residents live near to large intermodal facilities. In both cases, the health and safety of Will County residents are at risk to due the impacts of intermodal activity, with hundreds of thousands of Will County residents directly or indirectly affected by such vehicle emissions.

CARE's mission has been to provide forums for concerned citizens to share their knowledge, common experiences, and concerns to provide equal access to decision-making processes behind environmental policies. Will County's intermodal boom predictions indicate subsequent environmental issues that affect public health, safety, and welfare of residents. Passenger and truck emissions in Will County are currently CARE's highest priority. CARE has joined forces with several other organizations to draw attention to this public health issues caused by air pollutants like CO₂, NOx, as well as particulate matter, such as PM2.5, in Will County. As part of its efforts, CARE recognized other local policy efforts surrounding truck electrification, truck pollution, and the Warehouse Worker Protection Act (HB 2547), all indicating a dire emissions issue.⁶

⁴ https://worldpopulationreview.com/us-counties/illinois/will-county

⁵ https://news.wttw.com/sites/default/files/article/file-attachments/IL_Warehouse_Boom_Report_EDF_4-24-24.pdf ⁶ *Id.*; see also

https://static1.squarespace.com/static/6644d5b40f1fd566e656cbc3/t/6669d97c69084435934ce373/1718213009594/Annual+Repo

Clear and productive emission standards for passenger vehicles and trucks are necessary to connect the strategies of zero emissions standards while evaluating and addressing risks. The Board should employ the proposed Clean Car and Truck Standards and rely on the best available science as envisioned by proponent's welcome proposal now to protect Illinois' intermodal industry and the health of Illinois residents. Thus, we support the proponents' mission to combat emissions, by imposing California's stricter emission requirements and encouraging technological advancements in Illinois, to achieve public health and environmental benefits for Will County residents

III. Will County Pollutant Regulation

According to the EPA's Annual Air Quality Report (2022), 27.4% of Joliet/Will County air quality is moderate, and 1.4% of air quality is unhealthy for sensitive groups.⁷ The Will County Air Quality Index Sector (AQI) is a sub-sector of "Chicago Metropolitan Area including Will County only."⁸ Within this AQI sector, there were 42 occurrences of "unhealthy for sensitive groups" air quality (five in Will County) and two occurrences of "unhealthy" air quality in 2022. Furthermore, 2022 documents no ozone advisories, compared to four in 2021.⁹

There are two state air quality monitoring stations located in Will County: Braidwood (AQS ID: 17-197-1011) at Com Ed Training Center 36400 S. Essex Road, and Joliet (AQS ID: 17-197-1002) at Pershing Elementary School Midland & Campbells. Braidwood monitors ozone and PM2.5, while Joliet monitors P.M2.5 FEM.¹⁰ As of 2022, the estimated county stationary point source emissions per year in Will County include: Carbon Monoxide: 3,600.97 tons; NOx's: 3,921.30 tons; PM10: 1,413.92 tons; Sulfur Dioxide: 15,125.41 tons; Volatile Organic Material: 3,114.28 tons.¹¹ Such values place Will County in the top 3 counties in IL for COx readings, the top 4 for NOx readings, the top 4 for PM10 readings, top 3 for volatile organic material readings, and the top reading for Sulfur Dioxide.¹²

EPA mapping indicated Joliet's 2023 annual PM2.5 readings for local conditions 1-hour and 24-hour readings show there were exceptional emissions events during that time period.¹³ Will County's 2023 Air Quality Statistics report indicted ozone amounts well above the 8-hour O3 level of the respective air quality standard.¹⁴ Moreover, the overall Air Quality Index Values report in 2024 for Will County displayed both ozone and PM2.5 levels that are associated with a moderate level of concern. Furthermore, ozone readings indicated severe, moderate, and serious levels, inflicted in the population at various points throughout the year, while PM2.5 had moderate air quality readings.¹⁵

rt+2022-2023 FINAL+DRAFT.pdf; https://ilenviro.org/wp-content/uploads/2024/04/Create-Air-Pollution-Transparency-in-Illinois.pdf; see also https://ilenviro.org/wp-content/uploads/2024/04/Create-Air-Pollution-Transparency-in-Illinois.pdf

⁷ Annual Air Quality Report (2022): <u>https://epa.illinois.gov/content/dam/soi/en/web/epa/topics/air-quality/air-quality-reports/documents/2022-Annual-Air-Quality-Report-Final.pdf</u>, p. 11, 2022.

⁸ *Id.* at p. 9.

⁹ *Id.* at 10.

¹⁰ See the Ozone Design Values for Fourth High 8-hour Concentrations (ppm) and PM2.5 24 Hour Design Values 98th Percentile Concentrates (ug/m3), *Id* at 28.

¹¹ *Id.* at 78-79.

¹² *Id.*: COx – 1) Madison, 2) Cook, 3) Will; NOx – 1) Macon, 2) Cook, 3) Washington, 4) Will; Sulfur Dioxide – 1) Will; Volatile Organic Material – 1) Cook, 2) Macon, 3) Will.

¹³ See attached Annual and Daily Reports - AQS ID: 17-197-1002

¹⁴ See attached Air Quality Statistics Report (2023)

¹⁵ See attached PM2.5 Continuous Monitor Comparability Assessment: Site 17-197-11: Braidwood, IL; see also attached Windows Excel Greenbook

Electronic Filing: Received, Clerk's Office 04/28/2025 P.C. #515 Will County Community Impact IV.

As Will County's population and intermodal warehouses are rapidly increasing, the amounts of additional passenger vehicles and diesel trucks traveling through the area have skyrocketed. The population and warehouse economy growth could lead to substantial subsequent environmental and health impacts without intervention.

As of 2024, Will County is the second largest job creator in Illinois, with 12,000 jobs added between 2019 and 2023.¹⁶ Such employers include Amazon, Ulta Beauty, WeatherTech Greencore, Southern Glazer's Wine & Spirits, G&W Electric Company, Trinity Services, Walmart Distribution, Constellation: Braidwood Station, ExxonMobil Joliet Refinery, Diageo Global Supply, Federal Signal, Citgo Lemont Refinery, Harrah's Joliet Casino & Hotel, RTC Industries, Magid Glove, Harbor Freight Tools, Kehe Foods, Great Kitchens, Cornerstone Services, Inc., Cadence Premier Logistics, and the Hollywood Casino Joliet.¹⁷

Currently, Will County is home to the largest inland port in North America.¹⁸ Will County is served by five Class 1 railroads, three intermodal facilities four interstate, highways, three waterways, and 1,500 miles of pipeline.¹⁹ The rail and intermodal facilities are key freight assets in Will County. This includes 532 miles of rail lines, three intermodal facilities, and Class 1 railroads. The three intermodal facilities earn Will County the title of the largest inland port in the nation. Moreover, two intermodal facilities are within the CenterPoint Intermodal Center Joliet/Elmwood development. The BNSF's Logistic Park and Union Pacific's Global IV is ranked 5th in the nation, as they handle over 3.5 million international containers every year.²⁰ CenterPoint services Chicago and has access to BNSF and Union Pacific.²¹ BNSF's intermodal facility has the most intermodal lifts of any other facilities in the region. Furthermore, the transload facility at CenterPoint exports 76 million bushels of grain annually. Thus, Will County is a key link to the global supply chain.²²

With major employers and the largest inland port in North America comes intense roadway congestion. This is because Will County's roadways include three major interstates (I-80, I-55 and -57) and the I-55 Toll Road. Interstate 80 is the second largest in the U.S., as it provides the primary east to west route through the county. Current Truck routes according to the Community Friendly Freight Mobility Plan includes the following:

²¹ Id.; see also <u>https://cicjolietelwood.com/; 2010 Inland Port Impact Study; see also https://willcountyced.com/wp-</u> content/uploads/2021/08/inland port study.pdf

¹⁶ https://willcountyced.com/site-selection/transportation-assets/

¹⁷ https://willcountyced.com/site-selection/major-employers/

¹⁸ https://willcountyced.com/site-selection/transportation-assets/

¹⁹ Id.

²⁰ Id.

²² https://willcountyced.com/site-selection/transportation-assets/

Truck Roule	Type	Class	Communities Served		
1-55	Interstate	1	Bolingbrook, Romeoville, Joliet, Channahon, Wilmington, Braidwood		
1-355	interstate.	1	Boilingbrook, Lemont, Lockport, New Lenox		
1-80	Interstate		Joliet, New Lenox, Mokena, Tinley Park		
1-57	Interstate	1 1	University Park, Monee, Peotone		
IL 126	Major Arterial	Ű.	Plainfield		
IL 59	Major Arterial	11	Naperville, Plainfield, Joliet, Shorewood		
US 30	Major Arterial	11	Aurora, Plainfield, Joliet, New Lenox, Mokena, Frankfort		
IL 53	Major Arterial	Ŭ	Bolingbrook, Romeoville, Cresthill, Joliet, Elwood, Wilmington, Braidwood, Godley		
IL 7	Major Arterial	<u> </u>	Homer Glen, Lockport, Cresthill, Joliet		
IL 171	Major Arterial	U	Lockport, Joliet		
US 45	Major Arterial	ų.	Mokena, Frankfort		
U\$ 52	Major Arterial	U	Joliet, Manhattan		
US 6	Major Arterial	11	Joliet, Channahon		
IL 113	Major Arterial)I	Coal City, Braidwood		
IL 129	Major Arterial	ti –	Wilmington		
IL 102	Major Arterial	11	Wilmington		
IL 50	Major Arterial	u	University Park, Monee, Peotone		
IL 394	Major Arterial	1	Sauk Village, Crete		
CR 1	Major Arterial	11	Steger, Crete, Beecher		
Caton Farm Road	Local Arterial		Crest Hill		
Oakland Avenue	Connector	u	Crest Hill		
Division Street	Local Arterial	H	Crest Hill		
County Road 54	Local Arterial	0	Joliet		
Laraway Road	Local Arterial	U.	Joliet		
Arsenal Road	Local Arterial	0	Elwood		
Kankakee Street	Connector	-	Elwood		
Lorenzo Road	Local Arterial	1	Channahon		
River Road	Local Arterial	11	Elwood		
Wilmington Road	Local Arterial	n.	Peotone		
Indiana Avenue	Local Arterial	1	Beecher		

Presently, there are multiple plans for expanding transportation in area.²⁴ The Will County 2040 Long Range Transportation Plan was adopted by the County Board in March 2017.²⁵ The Long Range 2030 Transportation Plan will impact vehicle traffic volumes and patterns, and the 5-year transportation program will implement majority improvements to streets and roadways.²⁶

Such plans will impact many residents in Will County. Between 2003 and 2022, Illinois added 680 leased warehouses: accounting for an additional 226,000 daily truck trips.²⁷ While the EPA grade NOx and PM2.5

- https://willcounty.gov/Portals/0/Highway/Long%20Range%20Transportation/appendix d -
- _future_conditions_final.pdf?ver=KFBr32rSsj15jrr2J0jlrA%3d%3d; see also Project List:

²³ https://www.willcountyfreight.org/

²⁴ <u>https://willcountyced.com/wp-content/uploads/2021/08/will_county_transportation_blueprint_2019.pdf</u>

²⁵ <u>https://willcounty.gov/County-Offices/Economic-Development/Division-of-Transportation/Transportation-Plans-Programs</u>; see also Existing and Committee Baseline & Roadway Capacity Analysis:

https://willcounty.gov/Portals/0/Highway/Long%20Range%20Transportation/appendix f -

project list final.pdf?ver=Ftf3pPDsgp6vcVAc9GaUew%3d%3d; see also Roadway Evaluation Results:

https://willcounty.gov/Portals/0/Highway/Long%20Range%20Transportation/appendix_g_-

project evaluation final.pdf?ver=KWgLQ8MIN0v-2TMEQIsrJw%3d%3d

²⁶<u>https://willcounty.gov/Portals/0/Highway/Will_County_2030_TP%20with%20Resolution.pdf?ver=ooSbcZQxHwZJOnaimx8fBA%3d</u>
<u>%3d</u>

²⁷ https://news.wttw.com/sites/default/files/article/file-attachments/IL_Warehouse_Boom_Report_EDF_4-24-24.pdf at p. 5.

pollution monitors operated by the state showed no substantial changes in that time,²⁸ EDF research shows substantial PM2.5 pollution mortality occurring in rural areas, like Will County, away from EPA-grade PM2.5 monitors.²⁹ Now more than 25% of the emissions-associated mortality burden is in counties with no monitor.³⁰ See the below limited monitors and attached high effects of PM2.5 to understand the attributable mortality seen around leased warehouse clusters in Will County and the Chicago metro region:



Will County roadway plans, population and warehouse growth, and lack of monitors directly impact residents living hundreds of feet near major roads and railroads, while many community schools are located within heavily traveled roads.³² The increased exposure to passenger and warehouse traffic-related air pollution is linked to higher risk in childhood asthma.³³ Such asthma is a leading cause of missed school days, which negatively affects school performance.³⁴ In Will County alone, 200 annual NOx pediatric asthma cases occur, and 45% of NOx comes from on-road vehicles.³⁵ The following statistics of Illinois neighbors within a half mile of a warehouse are quite startling:

³³ <u>https://news.wttw.com/sites/default/files/article/file-attachments/IL Warehouse Boom Report EDF 4-24-24.pdf</u> at p. 2.

²⁸ Id.

 $^{^{29}}$ *Id.* at 6.

³⁰ *Id*.

 ³¹ <u>Id. at p. 11; see also attached PM2.5 Continuous Monitor Comparability Assessment: Site 17-197-1011: Braidwood, IL.</u>
 ³² <u>https://ilenviro.org/wp-content/uploads/2024/04/Create-Air-Pollution-Transparency-in-Illinois.pdf; see also attached PM2.5</u>
 Continuous Monitor Comparability Assessment: Site 17-197-11: Braidwood, IL

 $^{^{34}}$ *Id*.

³⁵ *Id.* at p. 11.

Neighbors within a half mile of a warehouse

% of	Population	Compared	to State Average	
			and the second second second	

State	# of Warehouses	Total Neighbors	< 5 years old	Black	Latino	Asian	American Indian	Below federal poverty line
California	4,618	3,900,000	263,000	122%	137%	103%	96%	118%
Colorado	449	250,000	16,000	182%	166%	100%	122%	133%
Illinois	2,401	1,981,000	138,000	139%	199%	117%	123%	131% 3

The above pollution exposure varies by proximity to truck traffic.³⁷ CARE recognizes pollution exposure as it relates to proximity in Will County due to the county's 370 leased warehouses generating 137,000 truck trips per day.³⁸ In all, 97,0000 people live within half a mile of a lease warehouse, and 5,000 are under 5 years old as a result of the Illinois warehouse boom.³⁹

Will County also faces other intermodal industry related health risks, as the state of Illinois' traffic-related air pollution also raises risks of preterm birth, low birth weight, dementia, heart disease, and stroke.⁴⁰ Such trafficrelated pollution would not be possible without diesel-fueled freight trucks and buses, which constitute 10% of U.S. vehicles and are responsible for 50% of transportation NOx emissions. Additionally, on-road vehicles produce 57% of direct fine PM2.5.⁴¹ Thus, while diesel trucks and buses account for only 7% of on-road fleets, they emit 67% of NOx and 59% of PM2.5 emissions.⁴² These diesel trucks emit high levels of pollution during start-up, idling, and low-speed travelling. Thus, the diesel truck traffic and pollution in Will County, combined with healthcare access and psychological stressors, only strengthen health impacts and disparities.⁴³

Many warehouse workers and nearby residents are Black, Hispanic/Latino, and immigrants, who all disproportionality face diesel pollution and other environmental harms.⁴⁴ While the intermodal industry in Will County is vital to the economy, it is glaring how from the "global south to the South and West sides of Chicago," communities like Will County are "sacrificed so wealthier populations can have access to whatever goods they desire."⁴⁵ Will County's historically underrepresented and sensitive groups living and working in the area will continue to be disproportionately affected without intervention. The director of another local community environmental group, Neighbors for Environmental Justice, notes the immeasurable and growing risks of the growing population and warehouse economy on the surrounding community in Will County by stressing:

"If a factory puts pollution in the air from a building, the state requires a permit. But if a warehouse ships it out on trucks and spreads it through our communities, if they drop it off outside our schools and put it in our parks, no permit is required. No data is collected. No harm is acknowledged."⁴⁶

Demographic trends in Will County paint a stark picture of who bears the brunt of the impacts from the area's transportation industry boom. Hispanic/Latino residents are 153% more likely to life within a half mile of leased warehouses, and Black residents are 125% more likely to live within a half mile of leased warehouse.⁴⁷

³⁶ https://globalcleanair.org/wp-content/blogs.dir/95/files/2023/04/EDF-Proximity-Mapping-2023.pdf

³⁷ https://news.wttw.com/sites/default/files/article/file-attachments/IL Warehouse Boom Report EDF 4-24-24.pdf at p. 2. ³⁸ *Id.* at p. 11.

³⁹ Id. ⁴⁰ Id.

⁴¹ *Id*.

⁴² *Id*.

⁴³ https://ilenviro.org/wp-content/uploads/2024/04/Create-Air-Pollution-Transparency-in-Illinois.pdf

⁴⁴ Id.

⁴⁵ *Id*.

⁴⁶ https://news.wttw.com/2024/04/24/black-brown-communities-bear-brunt-pollution-distribution-warehouses-and-truck-traffic ⁴⁷ https://news.wttw.com/sites/default/files/article/file-attachments/IL_Warehouse_Boom_Report_EDF_4-24-24.pdf at p. 11.

Moreover, low-income residents are 108% more likely to live within half a mile of leased warehouses.⁴⁸ Thus, health impacts disparities, and risks stemming from passenger vehicles and diesel truck intermodal activity in Will County directly impacts these sensitive groups:



Illinois

Total warehouses: 2,401 All warehouse neighbors: 1,981,000

Category	Total population	Compared to state %	% in warehouse neighbors	% in state
Hispanic/Latino	655,000	199%	33%	17%
Black	422,000	139%	21%	15%
American Indian	18,000	123%	1%	1%
Asian	135,000	117%	7%	6%
White	1,169,000	80%	59%	74%
Children under 5	138,000	113%	7%	6%
Adults 65+	225,000	82%	11%	14%
Below federal poverty line	355,000	131%	18%	14%
Less than high school education	239,000	158%	19%	12%
Limited English proficiency	32,000	198%	2%	1%

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⁴⁸ *Id.* at p.11; see also United States Will County Census:

 $https://data.census.gov/table?g=040XX00US17_050XX00US17197\&y=2023\&d=ACS\%201-Year\%20Estimates\%20Selected\%20Population\%20Profiles$

 ⁴⁹ <u>https://globalcleanair.org/wp-content/blogs.dir/95/files/2023/04/EDF-Proximity-Mapping-2023.pdf</u>
 ⁵⁰ <u>https://globalcleanair.org/wp-content/blogs.dir/95/files/2023/04/EDF-Proximity-Mapping-2023.pdf</u>

V. Overview of Proposed Risks, Changes, & Benefits⁵¹

The first part of the proposed emission rule is the <u>Advanced Clean Cars II (ACC II)</u>. This applies to the sale of new light-duty vehicles and places obligations on vehicle manufacturers by setting pollution standards for conventional vehicles and sales requirements for zero emissions vehicles (ZEVs), eventually leading the total phasing out of ICE's. ACC II LEV Standards address NOx, carbon monoxide, and PM2.5 emissions. Affected NOx and PM2.5 emissions would be reduced by 83% and 85%, respectively. IL light-duty vehicles would avoid 180 million metric tons of GHG emissions.

The ACC II light duty vehicles LEV regulation changes test procedures to ensure reduced emissions of various ranges of in-use driving conditions that are more stringent than federal standards. Furthermore, the proposal lowers the fleet average standard for NMPG+NOx and lowers the max emission rate for light duty LEV standards.

ACC II benefits include: helping accelerate the transition towards ZEVs while increasing customer choices; three options for automakers to earn higher vehicle credit vales that increase ZEVs in historically disadvantaged communities; and achieving up to \$82.6 billion in cumulative net societal benefits through 2050.

The second part of the proposed emission rule is the <u>Advanced Clean Trucks (ACT</u>), which sets annual sales requirements for zero-emission and near zero-emission M/HD vehicles. This rule would address emissions from public transit buses, school buses, local freight trucks and other dirty M/HD vehicles in IL, which present GHG, NOx, and PM emission risks.

ACT changes include a credit and deficit mechanism for manufacturers to comply with each model year. Such ZEV credits are generated by producing and selling ZEVs and near-zero emission vehicles. Furthermore, credits and deficits adjust by specified weight class of vehicles, as heavy vehicles account for higher emissions.

ACT presents various economic and environmental benefits for manufacturers, heavy duty truck counterparts, and IL citizens. Illinois stands to gain significantly from the growing electric vehicle (EV) market, as it is home to leading EV manufacturers that will benefit local producers. Battery electric vehicles (BEVs) offer lower total cost of ownership (TCO) compared to diesel counterparts, particularly in long-haul trucking. Moreover, financial incentives from the Inflation Reduction Act and Bipartisan Infrastructure Law will further reduce compliance costs for businesses, while the Commercial Clean Vehicle Tax Credit provides up to \$40,000 in tax relief for purchasing qualified clean heavy-duty vehicles. Additionally, businesses can receive up to \$100,000 through the Alternative Fuel Infrastructure Tax Credit for new charging stations. Overall, ACT is projected to deliver over \$3.8 billion in cumulative net societal benefits by 2050, significantly exceeding the impacts of previous federal standards.

The third part of the proposed emission rule is the <u>Heavy-Duty Low NOx Omnibus [Low NOx (Nitrogen</u> <u>Oxide)]</u>. This sets standards on emission of smog-forming pollutants by M/HD combustion engines. NOx and PM2.5 exposure present a risk that the Low NOx rule addresses using standards for exhaust emissions related to M/HD diesel cycle engines.

Low NOx changes are based on three pre-existing certification cycles and on a new low load cycle, reflecting engine operations under low load and speed urban driving operations. The proposed changes are implemented in two phases (MY 2029 and MY 2031+) and set different NOx emission limits under the respective four cycles.

The Low NOx rule will compliment ACT's ZEV initiative and achieve substantial societal benefits. Low NOx aims to achieve over \$3.8 billion in cumulative net societal benefits by 2050 Low NOx seeks to significantly

⁵¹ Proposed Clean Car and Truck Standards: Statement of Reasons, https://pcb.illinois.gov/documents/dsweb/Get/Document-110497, June 27, 2024.

reduce health-harming emissions from combustion vehicles, as ZEVs become more prevalent. Moreover, Low NOx will reduce emissions from new M/HD vehicles by 90% starting in model year 2028, resulting in an annual reduction of 15,400 metric tons of NOx. Such reduction will yield approximately \$876.5 million in public health benefits by decreasing ozone levels, which form from the interaction of NOx.

VI. Conclusion

CARE endorses the proponents' proposal for new vehicle emission standards. For the people of Will County, the rapid development in the community and the rise of large intermodal facilities present public health concerns from vehicle emissions pollution. CARE is grateful that through the proponents, Illinois, like California, is at the forefront of developing protective standards, and CARE urges the Board to proceed in that same proactive and protective spirit by adopting the proposed rules and recognizing the best available science in settling vehicle emission standards. CARE believes the proposed rules and standards will better protect Will County residents, their communities, and similarly situated communities in Illinois. CARE strongly endorses the proponents' progressive approach which aligns with emerging health and safety concerns facing Will County communities.

Sincerely,

Keete Harley

Keith Harley, Attorney for Citizens Against Ruining the Environment Greater Chicago Legal Clinic, Inc. 17 N. State St., Suite 1710 Chicago, IL 60602 (312) 726-2938 kharley@kentlaw.iit.edu

Kenneth Walther, Attorney for Citizens Against Ruining the Environment Greater Chicago Legal Clinic, Inc. 17 N. State St., Suite 1710 Chicago, IL 60602 (312) 726-2938 kwaltherlaw@gmail.com Dear Mr. Brown -

Please be advised I represent Citizens Against Ruining the Environment, a Will County environmental organization.

Please accept the attachment as CARE's public comment in R24-17. I request CARE's public comment be placed in the public comment docket for consideration by the Illinois Pollution Control Board in R24-17.

Thank you.

Keith Harley, Attorney for Citizens Against Ruining the Environment Greater Chicago Legal Clinic, Inc. 17 N. State St., Suite 1710 Chicago, IL 60602 312-726-2938 kharley@kentlaw.iit.edu