



**From:** Jamie Auffenberg, Illinois Automobile Dealers Association  
**To:** Brown, Don  
**Cc:** Lawrence Doll and Mike Stieren  
**Subject:** Public Comment on Pollution Control Board Rule 2024-017.  
**Date:** Monday, April 28, 2025

## **I. Introduction and Professional Background**

My name is Jamie Auffenberg, and I am the Dealer Principal of the Auffenberg Auto Group, a family-owned and operated dealership group based in the Metro East region of Illinois. I am also proud to serve as the 2025 Illinois Automobile Dealers Association Chairman, representing over 700 new car and truck dealers across our state.

I represent the third generation of the Auffenberg family in the automotive industry. Our story began in 1942, when my father, James Auffenberg Sr., founded our family's first dealership in Belleville, Illinois, after returning home from service in the United States Navy during World War II. What began as a single storefront grew over the decades into a major auto group, with multiple locations and brands throughout southern Illinois. Today, my sons, Mike and Matthew Auffenberg, represent the fourth generation of our family's continued commitment to the automobile business and to serving Illinois communities.

Our dealerships proudly represent Ford, Hyundai, Kia, Mazda, Nissan, Volkswagen, Chrysler, Dodge, Jeep, and Ram, along with one of the largest selections of pre-owned vehicles in the St. Louis Metro East area. We serve customers from Belleville, O'Fallon, Shiloh, Collinsville, Alton, Edwardsville, and beyond.

Having spent over 30 years in the automotive industry, I have seen firsthand the evolution of our business and vehicles. Today, I respectfully submit these comments not just as a dealer, but as a local business owner, an employer, and a lifelong Illinois resident who is deeply committed to the prosperity and future of our state.

While I fully appreciate the environmental goals that inspire Rule R2024-017, I must respectfully oppose its adoption. The rule, as written, presents serious challenges for working families, small businesses like mine, and the broader economy of Illinois.

## **II. Impacts on Working Families and Vehicle Affordability**

Every day, my team and I work directly with Illinois families looking for dependable, affordable transportation. Whether it's a first-time buyer, a growing family needing a larger vehicle, or someone replacing an older car, affordability remains their number one concern.

This proposed Rule R2024-017 threatens to make safe, reliable vehicles even more expensive and harder to find. The California regulations this rule seeks to impose would dramatically shift the available inventory toward electric vehicles (EVs) and hybrid models. While we fully support offering a wide range of vehicles — including EVs — for customers who want them, the reality today is that many EVs remain out of reach for the average Illinois consumer.

Electric vehicles often carry higher upfront costs than their gasoline counterparts, even after federal incentives are applied. Furthermore, many customers in southern Illinois and other rural areas do not have practical or affordable access to charging infrastructure, making EV ownership simply unfeasible for their daily lives.

If this rule is adopted, working families will face fewer choices and higher prices. They may find themselves forced into vehicles they cannot afford or be left without viable options entirely. As a dealer who sees these realities firsthand, I am deeply concerned that the rule would disproportionately burden the people Illinois policymakers should be trying to protect.

Illinois consumers deserve *choices, not mandates*. They should be able to select the vehicle that fits their needs, budgets, and lifestyles, without being pushed into higher-priced models by regulatory requirements that do not reflect the realities of their lives.

## **III. Dealer Operational Challenges and Regional Disadvantage**

As a dealer, I am accountable not only to my customers but also to the hundreds of people my dealerships employ — service technicians, salespeople, administrative staff, and countless others whose livelihoods depend on our ability to meet consumer demand. Dealers like me do not manufacture vehicles, and we cannot force consumers to buy vehicles they do not want or cannot afford.

Proposed Rule R2024-017 would impose mandatory electric vehicle sales quotas that ignore these realities. Under this rule, even if customer demand for EVs does not materialize at California mandates levels, dealers would still be required to meet strict sales targets or face penalties. This places an unreasonable burden on dealerships, who are already navigating a challenging market, supply chain disruptions, and rapidly evolving consumer preferences.

Moreover, Illinois is not an island. My dealerships operate in the Metro East region, just minutes away from Missouri, a state that would not be subject to these California-style mandates. If this rule is adopted, it will create a significant competitive disadvantage for Illinois dealers like me. Customers who find fewer choices or higher prices at Illinois dealerships will cross the river into Missouri, where they can access a broader selection of vehicles without the additional regulatory costs.

This is not a hypothetical risk — it is a near certainty. Consumers will always seek the best value in a highly mobile society, especially near state borders. This would result in lost sales, tax revenue for the State of Illinois, and jobs for Illinois workers.

Rather than helping Illinois advance, this rule risks driving business — and opportunity — out of our state.

#### **IV. Illinois' Progress and Responsible Policymaking**

Illinois' automobile dealers contribute to our state's economy, communities, and workforce. The impact of our industry is significant and far-reaching:

##### **Key Illinois Dealer Economic Impact Highlights:**

- **700 dealerships** serving communities statewide.
- **90,000 total jobs supported** (42,947 direct and 51,617 indirect).
- **Average dealership employment:** 63 jobs per store.
- **Average dealership salary:** \$82,200.
- **Sales tax collected:** \$3.37 billion — accounting for **\$1 of every \$7** in Illinois sales tax revenue.
- **Total dealership sales:** \$42.1 billion.
- **Average dealership sales:** \$60.1 million.
- **Total earnings for Illinois residents attributable to dealership operations:** \$6.6 billion.
- **Average dealership payroll:** \$5.77 million (\$5.1 million in wages plus \$590,000 in benefits).
- **Total dealership contributions to local charities:** \$45.9 million.
- **Dealer investments in EV readiness (2022–2024):** \$171.5 million.

Dealers are not simply retailers of vehicles; we are significant economic drivers, major employers, taxpayers, and community partners throughout Illinois.

It is critical that any significant policy changes, especially those that could disrupt the automotive marketplace, consider these far-reaching economic implications.

Illinois has already made tremendous progress in improving air quality and reducing vehicle emissions. Today's internal combustion engine vehicles are cleaner and more efficient than ever, thanks to federal emissions standards and ongoing technological innovation by manufacturers.

These improvements have been achieved without adopting California's regulations, demonstrating that Illinois can continue to advance environmental goals through balanced, practical policymaking.

As a dealer who works directly with consumers every day, I see the enthusiasm some customers have for new technologies like electric vehicles. I also see the real economic barriers preventing many families from accessing these options today. The right path forward is not to force a one-

size-fits-all mandate that overlooks financial realities, regional infrastructure gaps, and diverse needs across our state.

Significant policy shifts of this magnitude — affecting transportation, consumer choice, the state economy, and local businesses — should be carefully considered through a whole legislative process, not imposed through administrative rulemaking. Illinois must make decisions that reflect its markets' readiness, infrastructure, and, most importantly, its people.

We all share the goal of a cleaner, more sustainable future. But we must achieve that future in a fair, affordable, and realistic way for all Illinoisans, not just a select few.

#### **V. Conclusion and Respectful Call to Action**

As a local business owner, an employer, and a lifelong resident of Illinois, I believe strongly that environmental progress and economic opportunity must go hand in hand. Proposed Rule R2024-017, while well-intentioned, risks putting affordable transportation further out of reach for working families, threatening local jobs, and driving business out of our state.

Illinois dealers are already committed to offering cleaner, more efficient vehicles and supporting the gradual transition to new technologies as consumer demand grows.

However, forcing mandates that outpace infrastructure, consumer affordability, and regional realities will do more harm than good.

For these reasons, I respectfully urge the Illinois Pollution Control Board to **reject Rule R2024-017**. Illinois deserves a thoughtful approach to vehicle standards that supports environmental goals while preserving consumer choice, economic opportunity, and fairness across all communities.

Thank you for your consideration

*Jamie Auffenberg*  
*Dealer Principal, Auffenberg Auto Group*  
*2025 Chairman, Illinois Automobile Dealers Association*