

**From:** [Toni Oplt](#)  
**To:** [Brown, Don](#)  
**Subject:** [External] Docket R 2024-017 PC: response to comments made by Illinois Environmental Protection Agency  
**Date:** Friday, May 9, 2025 2:21:01 PM

---

Hello:

My name is Toni Oplt and I am a resident of Madison County, Illinois, the 11th worst county in our state for diesel engine PM2.5 air pollution. I spoke before you in Springfield less than two months ago and advocated then for the Advanced Clean Trucks (ACT) and Heavy-Duty Low-NOx Omnibus (HDO) rules.

Today, I wish to respond to the recent comments submitted by the Illinois Environmental Protection Agency on R24-17: PROPOSED CLEAN CAR AND TRUCK STANDARDS and their unwillingness to acknowledge the many, many people who submitted written and in person comments, asking the IPCB to adopt the California Clean Air Standards and significantly reduce CO2 emissions in our state. That the IEPA can feel it is acceptable to completely ignore public health, air pollution and climate concerns while spouting Trump administration policy in order to save their own funding is unconscionable. Unconscionable, but apparently true.

Let me remind the Board that when I both wrote and spoke to you about this matter, I offered my own personal story of what life is like in Madison County:

Along the outskirts of my hometown of Edwardsville, warehouses line the 255 Interstate for miles. What was once farmland is now a vast field of asphalted pads that accommodate a constant stream of heavy-duty trucks arriving and leaving the warehouse bays, idling for long periods as shipments are loaded and unloaded. These trucks, once never seen inside our city limits, are granted further leniency for through traffic each year.

Along with the increase in the trucking industry has come an increase in poor air quality days for our area. Over the past five years, I have learned to continually check air quality to see if it is safe to be outside, to take a walk to town, to ride my bike, to work in my garden. For days on end, the air never improves above moderate. Since I suffer from severe dust allergies, particulate matter becomes a real threat.

But my complaints pale in comparison to the high level of childhood asthma in our county. The hundreds of days children and vulnerable adults spend in emergency rooms, the lost workdays (and sometimes jobs) for parents, the lost school days for our future generations add up to a massive cost burden, calculated in human suffering and economic hardship. Madison County has higher levels of respiratory illness and non-fatal heart attacks compared to most other counties, which is why the Respiratory Health Association added it to the Dirty Dozen list in 2023. As I stated earlier, we are

number 11, so it is even worse for counties listed above us.

But there is another factor of concern here that is so often left out of our legal and political conversations: the devastation caused by cumulative impact. As someone who has stood before you in the past participating in public comment on strengthening coal ash regulations, as well as standing before the Office of Surface Mines and Minerals in the IDNR and the IEPA speaking against permit expansions that benefit only polluters, I have come to realize that cumulative impacts are never considered. There are loopholes in permit language and narrowed definitions of what can be acknowledged as relevant and a myopic view of what really needs to be done or changed. Yet for people who live in counties like mine, scarred by heavy industrial pollution, as well as diesel exhaust and agricultural chemical drift, there is no loophole, no narrower view, no blinders to keep us from the true threat of cumulative impact. So this conversation about diesel exhaust is really a small conversation about the truly large reality of our situation. For us everything matters.

And let me add this: While on route to Springfield for the public hearing, I carpooled with two others, and as a team we counted the diesel trucks on the highway during our one-way trip. Keep in mind that we were on the road less than an hour and a half and covered only a stretch of Interstate 55 between Hamel and Springfield. Yet in that short time we counted well over 300 diesel trucks. We checked our numbers three times because we just couldn't believe the number would be that high. So you see again, the cumulative impact on people and planet.

What I find most appalling in the comments submitted by IEPA is the total absence of any reference to human health protection or environmental concerns, even though, as their name implies, they have these responsibilities as part of their very existence. They chose instead to uphold the words of a few industry lobbyists rather than hundreds of comments submitted by people like me, by physicians, by direct victims of air pollution who struggle each day just to breathe.

In their comment, the IEPA is literally asking you to do nothing, to ignore your mission to protect public health. They are counting on you to sit back. But we—the people you have sworn to protect—are asking you to step up, to uphold your mission that is well within your power.

The impacts of diesel pollution on health, economics, and communities in Illinois are enormous. We must establish strong yet feasible emission standards for new fossil fuel trucks that will continue to be sold and increase sales targets for new electric trucks. Eleven states have already adopted this ACT. *Please put us on the path to a better future, a healthier population and a forward growing economy. Please adopt the Advanced Clean Trucks (ACT) and Heavy-Duty Low-NOx Omnibus (HDO) rules,*

As always, I am greatly appreciative of your attention to our problems and our hopes for a better future. Thank you.

Toni Optt