

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:

BOARD CONSIDERATION OF

ENVIRONMENTAL JUSTICE IN BOARD

PROCEEDINGS

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R 25-18

(Rulemaking – Procedural)

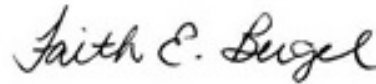
NOTICE OF ELECTRONIC FILING

To: Attached Service List

PLEASE TAKE NOTICE that on August 22, 2025, I electronically filed with the Clerk of the Illinois Pollution Control Board **COMMENTS OF SIERRA CLUB**, copies of which are served on you along with this notice.

Dated: August 22, 2025

Respectfully submitted,



Faith E. Bugel
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Wilmette, IL 60091
(312) 282-9119
FBugel@gmail.com
Attorney for Sierra Club

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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BOARD CONSIDERATION OF)	R 25-18
ENVIRONMENTAL JUSTICE IN BOARD)	(Rulemaking – Procedural)
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COMMENTS OF SIERRA CLUB

Pursuant to 35 Ill. Adm. Code 101.628(c) and 101.110(a), Sierra Club hereby submits these comments in the above-referenced docket. We greatly appreciate the Illinois Pollution Control Board's (the "Board") opening of this docket and providing the opportunity for rulemaking participants and members of the public to submit comments. The Attorney General has stated that "environmental justice is a crucial consideration in every environmental law decision and is vitally important for protecting the constitutional right to a healthful environment for all citizens of Illinois"¹ and the Sierra Club agrees. Sierra Club has had a longstanding commitment to environmental justice.² The priority of justice for overburdened communities, however, is being questioned at other levels of government and we believe that this increases the risk of environmental and health harms being borne by frontline communities. As a result, it is imperative that Illinois—at all levels of government³—take concrete actions to combat environmental injustice.

As the Board may know, none of the legislative proposals discussed in the Board's March 20, 2025 order in this docket were passed by Illinois lawmakers during the past legislative session. Accordingly, Sierra Club requests that the Board keep this docket open to explore mechanisms by which the Board may incorporate environmental justice into its rules.

Sierra Club notes that the Board stated in the above-referenced order that it may issue further guidance for participants in this docket. Greater detail regarding mechanisms or options by which the Board might incorporate environmental justice considerations into various Board proceedings would be beneficial. Information that might be helpful includes (1) whether there are particular rules, or types of rules, into which the Board could incorporate environmental justice considerations; and (2) whether there is a single set of environmental justice rules, standards or procedures that could be applied in every rulemaking, for instance, or every enforcement action. Sierra Club appreciates any guidance the Board can provide to help us understand how participants can assist the Board in this rulemaking.

¹ PCB R 25-18, PC #2, Comment Submitted by The Attorney General's Office (Feb. 25, 2025) at 1.

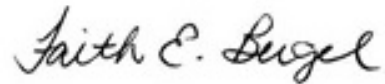
² <https://www.sierraclub.org/environmental-justice>

³ "Environmental justice concepts are embedded in a variety of State and federal laws, so it is appropriate for the Board to formally consider their application in its proceedings." PCB R 25-28, PC # 1, Comment Submitted by the Environmental Protection Agency (Feb. 10, 2025) at 1.

Thank you again for opening this docket and for the Board's consideration of these comments.

Dated: August 22, 2025

Respectfully Submitted,

A handwritten signature in cursive script that reads "Faith E. Bugel".

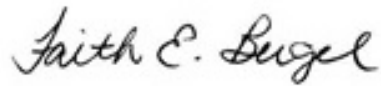
Faith E. Bugel
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Attorney for Sierra Club

CERTIFICATE OF SERVICE

The undersigned, Faith E. Bugel, an attorney, certifies that I have served by email the Clerk and by email the individuals with email addresses named on the attached Service List, a true and correct copy of the **COMMENTS OF SIERRA CLUB**, before 5 p.m. Central Time on August 22, 2025. The number of pages in the email transmission is 6 pages.

Dated: August 22, 2025

Respectfully Submitted,

A handwritten signature in cursive script that reads "Faith E. Bugel".

Faith E. Bugel
1004 Mohawk
Wilmette, IL 60091
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Attorney for Sierra Club

<u>SERVICE LIST</u>	
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