

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)	
)	
BOARD CONSIDERATION OF)	R25-18
ENVIRONMENTAL JUSTICE IN BOARD)	(Rulemaking – Procedural)
PROCEEDINGS)	

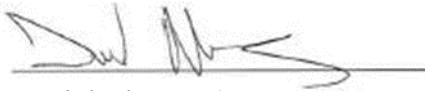
NOTICE OF ELECTRONIC FILING

To: Attached Service List

PLEASE TAKE NOTICE that on August 27, 2025, I electronically filed with the Clerk of the Illinois Pollution Control Board (“Board”) **INITIAL COMMENTS OF ENVIRONMENTAL LAW AND POLICY CENTER**, copies of which are served on you along with this notice.

Dated: August 27, 2025

Respectfully submitted,



Daniel Abrams (IL Bar No. 6338638)
David Scott
Environmental Law & Policy Center
35 E Wacker Dr., Ste. 1600
Chicago, IL 60601
312-673-6500
dabrams@elpc.org
dscott@elpc.org

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INITIAL COMMENTS OF ENVIRONMENTAL LAW & POLICY CENTER

Environmental Law & Policy Center (ELPC) appreciates the opportunity to engage in this docket and respectfully submits these initial comments pursuant to 35 Ill. Adm. Code 101.628(c) and 101.110(a). ELPC is the Midwest’s leading environmental legal advocacy organization, which combines effective public interest litigation with strategic policy advocacy, sound science and economic analysis.¹ ELPC concurs with the Illinois Attorney General 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.”² ELPC also concurs with the Illinois Environmental Protection Agency that “[e]nvironmental 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.”³ It is more important than ever before that the State of Illinois, and its various levels of government, take necessary steps to provide a healthful environment for communities that have been, and remain, overburdened by pollution and environmental harms, which negatively impact human health and welfare.

ELPC further supports Earthjustice’s and Sierra Club’s requests that the Board keep this docket open to explore mechanisms by which the Board may incorporate environmental justice into its rules.⁴ Like Earthjustice and Sierra Club, ELPC also would welcome the opportunity to consider any guidance that the Board may issue to participants in this docket, including whether there are particular rules, or types of rules, into which the Board plans to build environmental justice considerations, and whether there are particular types of standards that the Board believes will be helpful to it in considering environmental justice. ELPC would welcome the opportunity to provide input or otherwise assist the Board in its efforts under this docket, and appreciate all guidance the Board can provide to help facilitate ELPC’s and others’ participation and engagement in those efforts.

¹ <https://elpc.org/about/>

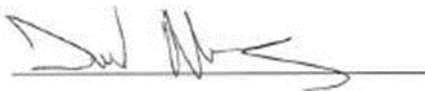
² PCB R25-18, PC #2, Comment submitted by the Attorney General’s Office (Feb. 25, 2025) at 1.

³ PCB R25-28, PC #1, Comment submitted by the Environmental Protection Agency (Feb. 10, 2025) at 1.

⁴ PCB R25-18, PC #3, Comment submitted by Earthjustice (Aug. 22, 2025); PC #4, Comment submitted by Sierra Club (Aug. 22, 2025).

Dated: August 27, 2025

Respectfully submitted,

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Daniel Abrams (IL Bar No. 6338638)

David Scott

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Chicago, IL 60601

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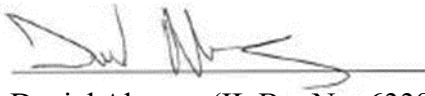
dscott@elpc.org

CERTIFICATE OF SERVICE

I, the undersigned, on oath state the following: that I have served the attached **INITIAL COMMENTS OF ENVIRONMENTAL LAW & POLICY CENTER** by email upon the Clerk and the individuals with email addresses named on the Service List provided on the Board's website, available at <https://pcb.illinois.gov/Cases/GetCaseDetailsById?caseId=17537>; that my email address is dabrams@elpc.org; that the number of pages in the e-mail transmission is 6 pages; and that the e-mail transmission took place before 5:00 p.m. CT on August 27, 2025.

Dated: August 27, 2025

Respectfully submitted,

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Daniel Abrams (IL Bar No. 6338638)
David Scott
Environmental Law & Policy Center
35 E Wacker Dr., Ste. 1600
Chicago, IL 60601
312-673-6500
dabrams@elpc.org
dscott@elpc.org

<u>SERVICE LIST</u>	
Don Brown Clerk of the Board Don.brown@illinois.gov Illinois Pollution Control Board 60 E. Van Buren St. Suite 630 Chicago, Illinois 60605	Charles Matoesian charles.matoesian@illinois.gov Dana Vetterhoffer dana.vetterhoffer@illinois.gov Andrew Armstrong Andrew.armstrong@illinois.gov Illinois Environmental Protection Agency 2520 W. Iles Ave. P.O. Box 19276 Springfield, IL 62794
Renee Snow - General Counsel renee.snow@illinois.gov Illinois Department of Natural Resources One Natural Resources Way Springfield, IL 62702-1271	Office of the Attorney General Jason James jason.james@ilag.gov 201 West Point Drive, Suite 7 Belleville, IL 62226
Office of the Attorney General Caitlin Kelly Caitlin.Kelly@ilag.gov 69 West Washington Street, Suite 1800 Chicago, IL 60602	ArentFox Schiff LLP Andrew N. Sawula Andrew.sawula@afslaw.com One Westminster Place, Suite 200 Lake Forest, IL 60045
Faith Bugel fbugel@gmail.com 1004 Mohawk Wilmette, IL 60091	Environmental Law & Policy Center Daniel Abrams dabrams@elpc.org David Scott dscott@elpc.org 35 E. Wacker Dr., Ste. 1600 Chicago, IL 60601
Greater Chicago Legal Clinic Keith Harley kharley@kentlaw.edu 211 W. Wacker, Suite 750 Chicago, IL 60606	McDermott, Will & Emery Mark A. Bilut mbilut@mwe.com 227 West Monroe Street Chicago, IL 60606

<p>IERG Kelly Thompson – Executive Director kthompson@ierg.org 215 E. Adams St. Springfield, IL 62701</p>	<p>Melissa Brown Melissa.Brown@heplerbroom.com Alec Messina Alec.messina@heplerbroom.com HeplerBroom LLC 4340 Acer Grove Drive Springfield, IL 62711</p>
<p>ArentFox Schiff LLP Joshua R. More jmore@afslaw.com Sarah Lode Sarah.Lode@afslaw.com 233 S. Wacker Dr., Ste. 6600 Chicago, IL 60606</p>	<p>U.S. EPA, Region 5 Michael Leslie leslie.michael@epa.gov Ralph H. Metcalfe Federal Building 77 West Jackson Blvd. Chicago, IL 60604</p>