



The Nature Conservancy in Illinois  
400 N. Michigan Avenue, Suite 1100  
Chicago, IL 60611-4163

tel (312) 580-2100  
e-mail Illinois@tnc.org  
nature.org/illinois

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10/24

December 2, 2024

Illinois Pollution Control Board  
60 E. Van Buren St., Ste. 630  
Chicago, Illinois 60605

RE: R2024-017 In the Matter of: Proposed Clean Car and Truck Standards:  
Proposed Section 35 III

We would like to thank the Illinois Pollution Control Board for the opportunity to provide public comment regarding the possible adoption of proposed clean car and truck standards.

The Nature Conservancy joins environmental and public health partners in urging the Board to adopt the Advanced Clean Trucks, Heavy-Duty Omnibus Low NOx, and Advanced Clean Cars II rules to address diesel and motor engine pollution. The Nature Conservancy is a national and global non-profit organization whose mission is to conserve the lands and waters on which all life depends, protecting people's access to nature and the outdoors. As such, our work in Chicago is bolstered by the city's nearly 9,000 acres of parkland. Since 2015, the Chicago Park District and The Nature Conservancy's Illinois Chapter have partnered to engage Chicago's communities in stewardship activities in our local parks, inspiring equitable investment, access, and care for these shared spaces citywide.

In the southeast side of Chicago, our work to protect nature and connect people to the outdoors happens throughout the Calumet Industrial Corridor, from inland parks like Big Marsh and eastward to the lakeshore at Park no. 566 and Steelworkers Park. For decades, residents of the southeast side have experienced environmental injustice by outgoing industry, disproportionate air pollution impacts from the region's transportation corridor, and a lack of historical access to a clean environment. Even with our collaborative work in connecting residents to the outdoors and restoring the natural environment, the legacy of air pollution permeates to the status quo. In the Respiratory Health Association's 2022 [\*The Dirty Dozen\*](#) report, they found that "Illinois ranks fifth among all states with the highest number of deaths from PM<sub>25</sub> diesel engine pollution per capita in 2023..." noting that members of our communities are 'disproportionately impacted by diesel air pollution.' Their report found that projected health impacts from this pollution include heart attack cases, acute bronchitis cases, respiratory symptom cases, and asthma cases. Communities embedded in transportation corridors face the brunt of this pollution and its devastating impacts, causing inequity in the quality, use, and health of our city's natural spaces. We believe a meaningful reduction in air pollution will further connect these historically marginalized communities

to the outdoors and enhance their access to nature in addition to protecting their physical health.

Moreover, The Nature Conservancy's Illinois chapter is committed to addressing climate change, such as with our support of the landmark Climate and Equitable Jobs Act. Illinois' transportation sector is the state's largest source of CO<sub>2</sub> emissions, so it is imperative we continue our efforts at decarbonization by moving towards further incentivized electric vehicle rollouts.

By adopting the Advanced Clean Trucks, Heavy-Duty Omnibus Low NO<sub>x</sub>, and Advanced Clean Cars II rules, the Illinois Pollution Control Board can codify a reduction in air pollutants for all communities, including our most vulnerable environmental justice communities, incentivize more clean vehicles in the state to meet our climate goals, and, in turn, connect more people to the outdoors. We are appreciative of the opportunity to provide comment on this pressing matter.

Sincerely,  
Tarik Shahzad  
External Affairs Associate  
The Nature Conservancy in Illinois  
[tarik.shahzad@tnc.org](mailto:tarik.shahzad@tnc.org) | 773-844-0395