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PUBLIC COMMENT ON R24-17, ACC II AND ACT STANDARDS

EV's are Clearly a Cost Savings to Small Business

EV's are clearly a cost savings to small business. There are no legitimate arguments to the contrary. Stimulating the EV market also supports manufacturing in the region and across the country.

Initial Costs: EV prices are coming down and are currently offset by tax credits. Also, there are many inexpensive used EV's on the market and used EV prices will fall as EV prices in general fall.

Fuel and Maintenance: Fuel and maintenance costs for EV's are significantly lower than gasoline-powered vehicle, and savings increase with mileage. According to a [reliable news source](#) "Superusers" (with high mileage) would save an average of \$400 a month (as of 2024), a figure that is very likely to increase substantially in the near future. Even with technical glitches associated with emerging technologies, EV maintenance is far cheaper than costs associated with internal combustion engines, simply because the basic technology is so much simpler. Also, electricity is cheaper, and electricity prices are more predictable than fossil fuel costs which fluctuate with domestic political climates and international conflicts.

Chargers: The cost of installing chargers is negligible in terms of the total cost of ownership and chargers become real estate assets.

Solar Panels: Charging vehicles with onsite solar panels is easy and inexpensive. Among the many benefits of installing on-site solar are cheaper energy, money in pocket from incentives and tax benefits, and an increase in property values. Running a sustainable business is also a form of corporate social responsibility and a way for a small business to be a good neighbor and build its reputation and customer loyalty.

Small Trucks and SUV's:

Electric Small Trucks and SUVs are Cost Effective: The financial benefits of owning small electric trucks or SUV are the same as owning electric cars.

Electric Trucks are Manufactured in America: Electric trucks produced in the U.S. include the Rivian R1T, the GMC Hummer EV, the GMC Sierra EV, the Ram 1500 REV, and the Ford F-150 Lightning. Supporting the EV industry supports the American auto industry and American EV battery manufacturing and has long term-economic benefits because it helps the U.S. compete with China in this emerging international market.

Medium- and Heavy-Duty Vehicles: [Check]

Please note that ACT applies *only to large entities and fleets*. So, this standard is *irrelevant to small business*. Nevertheless, electric medium- and heavy-duty trucks are projected to become a cost savings compared to their diesel counterparts, especially when considering the total cost of ownership (TCO) over the long term, due to lower fuel and maintenance costs.

Why is NFIB Opposing?

I discovered the NFIB opposition campaign while searching for general information about the March 20205 hearings. Given the obvious financial benefits associated with EVs, it is hard to believe that the NFIB has any but political motivations. Contrary to its website statements, NFIB is not a non-partisan organization. A number of top executives are former employees of Republican politicians at all levels of government. One was an employee of The Heritage Fund, and another worked for NRA. (Most, if not all, of these political organizations are directly or indirectly funded by the fossil-fuel industry including Koch networks.)

Listening to Locals:

The testimony of local environmental and health organizations, and various local experts, should have more weight than that of partisan organizations with long records of opposing renewable energy for political reasons. However, even more to the point, economic **facts** and not fictions should be considered. When both economic facts and social factors align, the Board has no legal or ethical justification to oppose pollution reduction measures.

Summary:

Government agencies are often tasked to weigh economic benefits against social welfare. This, however, is not such a case. EV's small and large are clearly a benefit for small businesses, in both urban and rural areas of the state. Buying EV's supports American manufacturing in the region and EV battery manufacturing across the country. EV's are a significant way to reduce carbon emissions and negative impacts on vulnerable populations in Illinois urban centers and promote alternative energy production a clear economic boon to rural communities across the Midwest. In general, the fossil-fuel industry which opposes the growth of EVs externalizes the real costs of pollution as negative health impacts and increased health costs to everyone, and suppresses the growth of new industries and new job opportunities in depressed communities—both urban and rural—while reaping financial benefits for the few.

Please see links to information sources and an important quote on the next two pages.

Sources:

“How much will an electric vehicle really cost you?”

<https://www.cbsnews.com/news/electric-vehicle-ev-true-cost-of-ownership/>

“Advance Clean Trucks”

<https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>

“NFIB: Illinois to Hold Additional Hearings”

<https://www.nfib.com/news-article/illinois-to-hold-additional-hearings-on-proposal-to-adopt-california-vehicle-emissions-standards/>

“NFIB: Our Leadership”

<https://www.nfib.com/about-nfib/>

“NFIB: Key Votes”

<https://www.nfib.com/news-article/key-votes-nfib-supports-bills-to-make-energy-more-affordable/>

“3 Ways Rural Communities Benefit from Renewable Energy Development”

<https://cleangridalliance.org/blog/229/3-ways-rural-communities-benefit-from-renewable-energy-development#:~:text=They%20bring%20jobs%2C%20increase%20tax,brings%20the%20opportunities%20back%20home.>

“Leonard Leo, Koch networks pour millions into groups prepping for potential second Trump administration”

<https://www.nbcnews.com/politics/2024-election/leonard-leo-koch-networks-pour-millions-prep-potential-second-trump-ad-rcna144360>

Quotes from the above source regarding Heritage Foundation, Project 2025, and the fossil fuel industry:

“Launched by the Heritage Foundation in April 2022, Project 2025 is a two-pronged initiative to develop staunch conservative policy recommendations and grow a roster of thousands of right-wing personnel ready to fill the next Republican administration.”

[. . .]

“Since 2021, Leo’s network and groups that have gotten funding from it have funneled over \$50.7 million to the groups advising the 2025 Presidential Transition Project as part of its ‘Project 2025 advisory board,’ according to tax documents reviewed as part of the analysis by Accountable.US, a progressive advocacy group.”

[. . .]

“Project 2025’s vision for the next conservative administration’s energy agenda would rapidly increase oil and gas leases and production through the Interior Department to focus on energy security, and proposals include reforming offices of the Energy Department to end focus on climate change and green subsidies.

The Environmental Protection Agency would cut its environmental justice and public engagement functions, ‘eliminating the stand-alone Office of Environmental Justice and External Civil Rights,’ according to a proposal [drafted](#) by Mandy Gunasekara, a former chief of staff at the EPA under Trump.”

Note: Research and writing assisted by Generative AI on Google.

Electronic Filing: Received, Clerk's Office 03/10/2025 P.C.#278

From: [Christine Skolnik](#)
To: [Brown, Don](#)
Cc: [PCB.Clerks](#)
Subject: [External] Public Comments on EV Standards
Date: Monday, March 10, 2025 12:00:15 PM
Attachments: [IPCB Hearings Comment.Economic Factors.docx](#)

Illinois Pollution Control Board Clerk, Don Brown:

Please find attached my Public Comments on R24-17, EV Standards.

Many thanks you and your colleagues for your service,

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New Writing: <https://www.fourthreethree.org/blog/folding>