



WORLD
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INSTITUTE

10 G Street, NE Suite 800 Washington, DC 20002 USA (PH) +1 (202) 729-7600 (FAX) +1 (202) 729-7610 www.WRI.org

April 14, 2025

Illinois Pollution Control Board
60 E Van Buren St, Suite 630
Chicago, IL 60605

Re: Case # R24-17 In the Matter of: Proposed Clean Car and Truck Standards: Proposed Section 35 Ill.
Admin. Code 242

Chairperson and Members of the Board,

On behalf of the World Resources Institute's Electric School Bus Initiative, I am writing to urge the Illinois Pollution Control Board to adopt the Advanced Clean Trucks (ACT) rule, a crucial tool in the state's toolbox for reducing air pollution from trucks and buses, while offering manufacturers flexibility to ensure feasible and realistic compliance. While our focus of this comment is student transportation - including the student health and safety benefits that will accompany ACT adoption - the transition to cleaner trucks and buses is critical for the health and well-being of constituencies and communities across Illinois. This is especially true for underserved communities and communities of color who are disproportionately impacted by on-road vehicle pollution.

The Advanced Clean Truck (ACT) Rule

The ACT rule is a key initiative aimed at reducing air pollution and combating climate change. In 2020, the California Air Resources Board (CARB) adopted the ACT Rule, which requires manufacturers to gradually increase their sales of zero-emission trucks, starting in 2024. By 2035, the rule mandates that a substantial portion of truck sales, including those in the Class 4-8 category (which includes school buses), be electric.

As of January 2024, ten additional states (Colorado, Maryland, Massachusetts, New Jersey, New Mexico, New York, Oregon, Rhode Island, Vermont, and Washington) have adopted the ACT rule. By adopting the ACT rule, Illinois would join these states in driving the transition to cleaner, safer transportation, benefiting both the environment and public health.

Confirmed by the California Air Resources Board in [recent analysis](#), these standards are both practical and flexible, providing compliance [pathways](#) and [flexibilities](#) to support manufacturers and fleet operators in transitioning to zero-emission vehicles. For example, credits earned from early compliance can be applied to future obligations. The regulation offers additional flexibility through mechanisms such as credit banking, credit trading between manufacturers, and the ability to earn partial credits for near-zero-emission vehicles. Moreover, manufacturers are allowed up to three years to meet obligations, ensuring smoother compliance. Future rulemaking could also enable manufacturers to use excess credits in meeting targets across state lines, also known as pooling.

Electric school buses (ESBs), currently available in [26 models](#), and with [thousands deployed](#) in diverse settings across the country, are an attractive option for manufacturers to meet ACT targets.

ACT Impacts in Illinois

Illinois is well positioned to benefit from the adoption of the ACT Rule. The Illinois Climate and Equitable Jobs Act (CEJA) sets ambitious goals, including the deployment of 1,000,000 electric vehicles (EVs) by 2030. The ACT Rule is crucial for ensuring a sufficient supply of EVs to meet these targets, and ESBs – available in a wide range of models - can play a pivotal role in reaching this goal. Currently, Illinois operates around 22,000 school buses. Under the ACT rule, ESB sales in Illinois are estimated to experience gradual but important growth based on assumed ACT sales in the [EPA analysis](#) for their Phase 3 GHG rule, from just 40 ESBs purchased in 2023 to over 1,000 projected sales in 2035. This would not only contribute to the state's climate goals and protect community health but also position Illinois as a leader in clean transportation.

Projected Impacts of ACT on the IL Electric School Bus fleet			
	% sales assumed ESB	# bus sales	# ESB sales
2027	18%	1,527	275
2028	28%	1,527	428
2029	37%	1,527	565
2030	46%	1,527	702

2031	50%	1,527	764
2032	55%	1,527	840
2033	60%	1,527	916
2034	64%	1,527	977
2035	68%	1,527	1038
* Assumption of a 7% annual replacement rate			

Health and Environmental Benefits

Adopting the ACT Rule will drive a significant increase in ESB sales by 2035, while also protecting the health and well-being of Illinois residents, especially children. Many school buses in Illinois still run on fossil fuels, exposing students to harmful pollutants, including diesel exhaust, which is a known [carcinogen](#) and linked to [respiratory diseases](#) like asthma and [developmental](#) issues. Asthma, one of the leading causes of school [absenteeism](#), can be mitigated by reducing diesel exhaust exposure, yielding immediate health and educational benefits.

ESBs produce zero tailpipe emissions of harmful pollutants such as nitrogen oxide and particulate matter, significantly improving air quality for students, school staff, and surrounding communities. Children, being [especially vulnerable](#) to the effects of diesel exhaust, would benefit from the cleaner air provided by electric buses. In addition, electric buses offer a quieter, smoother ride, further enhancing the overall student and driver experience. By adopting the ACT Rule, Illinois can ensure safer, cleaner, and healthier transportation for its students.

Moreover, ACT adoption has the potential to address environmental inequities. One study has shown that communities of color experience on-road fine particulate matter pollution [61% to 75%](#) higher than for their white counterparts. Similarly, [Black students](#), [children with disabilities](#) and [low-income students](#) are all more likely to rely on diesel-burning school buses, leading to disproportionate exposure to air pollution. Adopting the ACT Rule would be a pivotal step toward cleaner air, ensuring that all communities, especially those most in need, benefit from healthier and safer transportation.

Funding Support & Cost Effectiveness

Furthermore, Illinois is actively advancing the adoption of ESBs statewide through strategic investments. State utilities are playing a significant role in supporting the EV transition through rebate programs and infrastructure investments. For example, [ComEd](#) has been approved to invest more than \$70 million to assist with EV purchases, with \$9 million of this total dedicated toward ESBs, as well as the development of charging infrastructure as part of its Beneficial Electrification Plan (BEP 1). Additionally, the Illinois Commerce Commission (ICC) has recently issued final orders for BEP 2, which continues to fund these initiatives. While this funding is specific to northern Illinois, ComEd's service territory includes numerous school districts and thousands of school buses, making it a critical resource for advancing transportation electrification in the region.

Moreover, Illinois school districts stand to benefit financially from the long - term cost savings of ESBs. While the upfront cost of an ESB is currently higher than a diesel bus, ESBs save districts, on average, over \$100,000 in operational costs over the lifetime of each bus. These savings - up to \$6,000 annually per bus in fuel and maintenance costs - can be reinvested into the classroom and other educational resources, helping improve the overall quality of education in Illinois. With current funding programs actively supporting buses and charging infrastructure, ESBs, and EVs more generally, present an economically smart investment for Illinois school districts and communities. By reducing operational expenses and redirecting those funds toward educational priorities, ESBs offer a financially sound and forward-thinking solution for schools across the state.

Economic Opportunities and Job Creation

In addition to the health and environmental benefits, the adoption of the ACT rule for ESBs presents significant economic opportunities for Illinois. As the demand for ESBs grows, so will the need for skilled workers in manufacturing, maintenance, and infrastructure development. The ACT rule can drive economic growth by creating thousands of good-paying manufacturing jobs and supporting related industries.

A Sustainable Future for Illinois

The adoption of the ACT Rule is a vital step in addressing Illinois' largest source of carbon emissions: transportation. By accelerating the transition to ESBs, Illinois can reduce greenhouse gas emissions from the school transportation sector. ESBs offer the [lowest greenhouse gas emissions](#) of any school bus type, even when accounting for the emissions from electricity generation. Over their entire lifecycle, ESBs emit less than half the greenhouse gases of both propane- and diesel-powered buses. As the share of energy that comes from renewable sources continues to increase across the country, the emissions associated with ESBs will continue to decline, unlike those from fossil fuel- powered buses, further reducing the environmental impact of school transportation.

By 2035, the ACT Rule could help Illinois cut transportation-related emissions by millions of tons annually, significantly contributing to the state's climate goals of achieving a 100% clean energy economy by 2050 as outlined in CEJA.

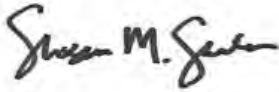
Conclusion

The transition to ESBs is not just an environmental or economic issue - it is a public health and justice issue. By adopting the ACT Rule, Illinois can lead the way in providing clean, efficient, and cost - effective transportation solutions for its school districts and communities. The rule will improve air quality, create jobs, reduce health risks, and lower costs, all while supporting Illinois' [Toward Equity](#) initiative, which outlines the state's commitment to advancing equity in economic opportunity, environmental justice, and public health. Aligning ESB adoption with these equity goals will help ensure that the benefits of cleaner air and reduced transportation costs are prioritized for historically underserved communities, reinforcing Illinois' broader commitment to a more just and sustainable future.

I urge the Illinois Pollution Control Board to adopt the ACT rule and take the next step toward a cleaner, healthier, and more sustainable future for Illinois students - and communities across the state.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan M. Gander". The signature is fluid and cursive, with the first name "Susan" being more prominent.

Sue Gander, Director
Electric School Bus Initiative
World Resources Institute

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From: [Alice Kwak](#)
To: [Brown, Don](#); [Horton, Vanessa](#); [Leoni, Carlie M.](#)
Cc: [Katherine Roboff](#); [Benjamin Hayman](#); [Sue Gander](#)
Subject: [External] Case # R24-17 In the Matter of: Proposed Clean Car and Truck Standards: Proposed Section 35 Ill. Admin. Code 242
Date: Monday, April 14, 2025 12:05:11 PM
Attachments: [WRI In Support of Case # R24-17 In the Matter of Proposed Clean Car and Truck Standards Proposed Section 35 Ill. Admin. Code 242.pdf](#)

Dear Clerk Brown, Hearing Officer Horton, and Hearing Officer Leoni,

I am writing on behalf of the World Resources Institute to express our support of Case #R24-17 and to advocate for the adoption of the Advanced Clean Trucks (ACT) rule, which will help Illinois achieve its environmental and public health goals while advancing equitable and sustainable transportation solutions.

Attached, please find a letter detailing our support for the ACT rule, the benefits it offers the state, and reasons for Illinois to continue its transportation electrification progress. We believe the rule will play a vital role in addressing pressing air quality challenges, protecting public health, and creating diverse jobs across various sectors.

Thank you for your leadership and commitment to a healthier, more sustainable future. We would be happy to discuss this further or provide additional information if needed.

Best regards,

Alice Kwak

Alice Kwak (she/her)

Policy Research Analyst, Electric School Bus Initiative

World Resources Institute

[WRI.org](https://wri.org)

electricschoolbusinitiative.org

alice.kwak@wri.org

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