



CITY OF CHICAGO



DEPARTMENT OF ENVIRONMENT
DEPARTMENT OF TRANSPORTATION

April 28, 2025

Don Brown
Illinois Pollution Control Board
60 East Van Buren, Suite 630
Chicago, IL 60605

Re: Public Comments in Support of Clean Car and Truck Standards in Illinois, IPCB Docket R24-17

Dear Illinois Pollution Control Board,

We are jointly writing to express our support for the proposed Clean Car and Truck Standards before the Board that, when adopted, will establish a comprehensive clean vehicle roadmap for all of Illinois, helping reduce air pollution and greenhouse gas emissions in Chicago. As we look to the future, it is more important than ever to transition to a cleaner, more sustainable transportation system. The transportation sector is responsible for a quarter of Chicago's greenhouse gas emissions and a significant contributor to the Chicago area's air quality issues. **Air pollution contributes to increased risk of chronic disease, which is the leading driver of Chicago's nine-year life expectancy gap between Black and white residents and decreases in life expectancy in the Latinx population**¹. Statewide Clean Car and Truck Standards are a necessary step toward working together for a cleaner, healthier, and more economically robust clean energy economy in Illinois.

Alignment with Chicago's Climate and Public Health Goals

The City of Chicago's (City) [Climate Action Plan](#) (CAP) emphasizes the importance of low-carbon, low-emissions transportation options in achieving the City's environmental and public health objectives. By transitioning to cleaner transportation options, such as electric

¹ City of Chicago Air Quality and Health Report, 2020

vehicles (EVs), the City aims to reduce greenhouse gas emissions, improve air quality, and promote environmental justice, particularly in communities disproportionately affected by pollution. The CAP outlines strategies to increase EV adoption, expand charging infrastructure, and enhance public transit options, all contributing to a sustainable and equitable urban environment.

The [Chicago Moves Electric EV and E-mobility Infrastructure Framework Plan](#) (EV Framework), developed by the Chicago Department of Transportation (CDOT), clearly outlines the urgent need for equitable, sustainable, and accessible electrification of our transportation system. Serving as a guide to meet the City's climate and transportation electrification goals, the EV Framework's four primary goals are 1) Ensuring Equity, 2) Encouraging Low-Carbon Transportation Solutions, 3) Closing Market Gaps in Infrastructure, and 4) Integrating Multi-Modal Transit Options. By adopting comprehensive policies to support EV and e-mobility adoption, we can significantly improve public health, address climate challenges, and ensure all residents have access to clean and reliable transportation options.

In September 2023, community and City leaders released the findings and recommendations from a 15-month process to develop Chicago's first [Cumulative Impact Assessment](#) (Assessment), a citywide project to provide data on how environmental burdens and other stressors vary in impact across the City. The Assessment, co-led and co-designed with people and organizations who live with these issues every day, identifies neighborhoods that experience the greatest cumulative impacts. Initial City commitments to reduce transportation impacts on communities include:

- implementing recommendations from the "Southwest Industrial Corridor Transportation Study" to minimize the impact of trucks and heavy-duty vehicles on streets, restrict truck traffic, manage truck parking and idling, expand the 3-1-1 system for truck complaints, incorporate emission reduction goals into transportation planning, and establish freight health metrics;
- creating a regional program to reduce traffic congestion, incentivize use of public transit and bikes, and reduce single-occupancy vehicle trips; and
- converting existing commercial vehicles to electric power

How Statewide Clean Car and Truck Standards Support These Objectives

Public Health Benefits

The transition to EVs and e-mobility solutions is critical for improving air quality in Chicago, particularly in historically underserved neighborhoods that experience disproportionate levels of air pollution. Transportation-related emissions are a major contributor to

respiratory diseases such as asthma, which disproportionately affect Black and Latinx communities on the South and West sides. By prioritizing the electrification of fleet vehicles, including the City's own municipal fleet electrification, the City is taking essential steps to reduce harmful pollutants and improve community health outcomes.

Statewide Clean Car and Truck Standards will accelerate this transition by ensuring that cleaner vehicle options are available across Illinois, reducing tailpipe emissions that contribute to health disparities and creating cleaner air for all residents.

Environmental Outcomes

Chicago has set ambitious sustainability goals through the CAP, including achieving a 62% reduction in carbon emissions by 2040. Electrifying transportation is a key pillar of this plan, as it seeks to directly reduce greenhouse gas emissions from internal combustion engine vehicles. Additionally, expanding access to public EV charging infrastructure will encourage private adoption of EVs, further contributing to climate resilience. The EV Framework also emphasizes multi-modal integration, supporting not just EVs but also public transit electrification, micromobility options like e-bikes, and first/last-mile connectivity solutions.

Statewide standards will complement the City's efforts by increasing the supply of zero-emission vehicles across Illinois, ensuring that consumers and businesses have access to clean vehicle options. This will enable Chicago to meet its climate targets while aligning with state and regional sustainability initiatives.

Equity and Accessibility

A central tenet of the EV Framework is ensuring equitable access to EV infrastructure. Low-income communities and communities of color are disproportionately affected by transportation-related pollution. Historically, EV charging stations have been concentrated in wealthier neighborhoods, leaving lower-income and majority-minority communities with limited options.

Statewide standards will help address these disparities by encouraging widespread investment in EV infrastructure motivated by a growing market for clean vehicles and ensuring cleaner transportation options are available to consumers in every community.

Economic Growth and Workforce Development

The transition to an electrified transportation system presents a significant opportunity for economic growth and workforce expansion. EVs have lower fuel and 40% lower

maintenance costs² compared to gasoline-powered vehicles. Statewide vehicle standards can accelerate the adoption of affordable EVs, providing long-term financial benefits to consumers and reducing the transportation sector's reliance on volatile petroleum products.

Investing in clean transportation infrastructure supports job creation in EV manufacturing, charging station deployment, and maintenance industries. Workforce development programs are training individuals in the skills needed to sustain this transition, fostering economic empowerment in communities that have historically faced employment barriers.

A statewide framework will enhance these efforts by ensuring that clean transportation policies support job creation throughout Illinois, rather than being concentrated in select municipalities.

Chicago's Actions and the Need for Statewide Support

The City of Chicago is investing in infrastructure and policies to accelerate the shift to EVs and other e-mobility options. To fully realize these benefits, the City has completed or is pursuing the following measures:

- **Committing to 100% municipal fleet electrification by 2035**, a goal established in the CAP. The City maintains more than 11,000 light, medium and heavy-duty vehicles, and pieces of equipment that City employees use in the provision of City services, including waste management, emergency services, street sweeping, and inspections. The City has installed 215 chargers citywide at municipal facilities, with 72 additional chargers in process. Additionally, the City has procured 203 EVs that make up approximately 28% of the non-emergency light-duty City-owned fleet. The City is developing a Fleet Electrification Plan to roadmap the transition and achieve the goal over time.
- **Expanding public EV charging infrastructure** in high-priority locations, particularly in underserved neighborhoods and near public transit hubs. The highest concentration of public EV charging stations is in downtown Chicago. The existing distribution of EV charging infrastructure creates gaps, particularly on the South and West sides of the city. The City is exploring leveraging City assets such as libraries, parks, the public right of way, airports, community centers, churches, schools, and

² [Comprehensive Total Cost of Ownership Quantification for Vehicles with Different Size Classes and Powertrains](#), Argonne National Laboratory [Comprehensive Total Cost of Ownership Quantification for Vehicles with Different Size Classes and Powertrains](#)

municipal buildings owned and/or operated by the county and other agencies to augment the public charging network.

- **Creating incentives for commercial fleets**, accelerating the transition of vehicles that contribute significantly to air pollution. Serving as North America's primary intermodal freight hub, Chicago is one of the largest transportation and logistics terminals in the U.S., making freight transport a significant contributor to Chicago's vehicle miles and air emissions. The City previously offered a point of sale electric truck incentive for medium-and heavy-duty fleet owners. The City is currently making plans to establish an EV charger incentive program for fleet owners electrifying their vehicles.
- **Streamline the permitting process** for residential and commercial EV charger installations to make adoption easier and more accessible. The City is actively preparing for the increase in electric vehicles (EVs) and EV charging stations by participating in the [Metropolitan Mayors Caucus' EV Readiness Program](#), which aims to reduce barriers to EV infrastructure investment and make it easier for residents and businesses to install EV charging stations. City zoning regulations have been established to facilitate EV charging station installation, ensuring they are no more difficult to site than similar infrastructure. For instance, the City has classified EV chargers as an accessory use when they are not the primary use of the site. To better facilitate the installation process, the City posts standard checklists and permitting forms online, providing a list of applicable local, state, and federal codes, laws, regulations, and best practices, and created an online permit approval process.
- **Engaging stakeholders**, ensuring that residents and businesses understand the benefits of electrification and have opportunities to voice their needs and concerns. The City recognizes the importance of ongoing, accessible engagement with stakeholders. CDOT is preparing for Phase 2 of its EV Framework engagement series to gain understanding, feedback, and more specific EV charging station location input from Chicago residents and fleets. The City is also providing access to reliable, multi-format information from trusted sources through its DriveElectricChicago.org website which includes resources, quick reference guides, and information to help residents and businesses learn about electric vehicles (EVs) and EV charging stations, make informed decisions, and navigate the EV charger permitting and installation process.

While Chicago has made strides in electrification, statewide Clean Car and Truck Standards will provide the regulatory support needed to advance these efforts at scale and

across Illinois. A consistent policy framework will send clear market signals, encourage private investment, and ensure that the benefits of clean transportation are expeditiously realized.

Conclusion

By committing to a regulatory framework to adopt cleaner vehicles and trucks in Illinois over time, we can create a cleaner, healthier, and more equitable experience for all communities. The City has established a strong foundation for EV transition, but statewide standards in collaboration with other US states are essential to achieving long-term success.

We urge you to adopt statewide Clean Car and Truck Standards that align with the City's initiatives resulting in a sustainable and thriving future for all Chicago residents.

Thank you for your time and commitment to this important initiative.

Sincerely,

Chicago Department of Transportation

Chicago Department of Environment