

May 12, 2025

Don Brown Clerk
Illinois Pollution Control Board
60 E. Van Buren, Suite 630
Chicago, IL 60605

Re: Response to Public Comment, R 2024-017, Proposed Clean Car and Truck Standards: Section 35 Ill. Adm. Code Part 242

Via email: don.brown@illinois.gov

To The Clerk and Hearing Officer:

Please be advised that I represent Citizens Against Ruining the Environment (CARE). CARE requested my assistance to submit public comments to contribute to Illinois Pollution Control R 2024-017, Proposed Clean Car and Truck Standards, 35 Ill. Adm Code Part 620. CARE is specifically submitting these comments in response to the public comments from the Illinois Environmental Protection Agency (“the Agency”). While CARE generally objects to the Agency’s comments and their positions in this rulemaking, CARE submits this comment to respond to one specific argument put forth by the Agency: the contention that the Board’s authority does not extend to regulating the sale of plug-in hybrid electric vehicles (“PHEV’s”). CARE finds that argument to be counter to the facts and advocating for a dangerous abrogation of the Board’s authority. CARE strongly encourages the Board to reject the Agency’s argument, rather than limit their authority over this particular technology.

The Agency argues that the Board does not have authority to regulate PHEVs because they do not constitute an “air-pollution hazard.”¹ While it is true that PHEVs have the potential to produce less emissions while using their all-electric mode, they also can still produce harmful emissions when running off their internal combustion engine (“ICE”). When not using their all-electric mode, PHEVs effectively function in the same way as traditional ICE vehicles. In this way they still qualify as a potential air-pollution hazard. Even assuming that the average emissions from PHEVs are less than those from ICEs, the collective emissions from PHEVs still constitute a potential air pollution hazard. This is especially a concern in areas like Will County, which is undergoing a massive surge in vehicle emissions.

As stated in its initial comments, CARE represents people residing in Will County, Illinois, whose communities are directly impacted by transportation-related emissions. Emissions are especially intense and ever increasing in Will County, thanks to the rapidly increasing population, growing warehouse industry, and three large intermodal facilities. The rising emissions from passenger vehicles and trucks in Will County present significant potential public

¹ Illinois EPA Public Comments, pg. 48-51.

health implications for Will County residents. With that massive surge in transportation, PHEVs have the potential to still contribute to the larger issue of harmful emissions from vehicles in the Will County area.

CARE strongly recommends the Board not to accept the Agency's arguments. Sales of PHEVs are consistently growing each year.² With that growth though, they also grow to make up a larger share of vehicle emissions each year. It is important for the Board to not cut off its ability to regulate these vehicles, now or in the future, by accepting the Agency's arguments. Just because PHEVs are a less-polluting alternative does not mean that the Board should have no authority to regulate them. It is important that the Board maintain its authority over these and similar lower-emission technologies now and in the future, particularly in light of the State's long-term emission reductions goals. CARE strongly encourages the Board to reject the Agency's arguments regarding PHEV regulation.

Sincerely,

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² <https://www.statista.com/outlook/mmo/electric-vehicles/plug-in-hybrid-electric-vehicles/united-states>