



Illinois Environmental Regulatory Group
An affiliate of the Illinois Chamber of Commerce

April 28, 2025

To: Don Brown, Clerk IL Pollution Control Board

From: Trejahn Hunter, Illinois Environmental Regulatory Group

Re: R2024-017

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

THE ILLINOIS ENVIRONMENTAL REGULATORY GROUP'S
POST-HEARING COMMENTS

Mr. Brown and the IL Pollution Control Board Members:

NOW COMES, the ILLINOIS ENVIRONMENTAL REGULATORY GROUP ("IERG"), by and through its attorney Trejahn Hunter, and hereby files its Post-Hearing Comments in this rulemaking for the Illinois Pollution Control Board's ("Board") consideration. On behalf of its Members, IERG appreciates this opportunity to provide comment on the proposed amendments adding a new code section, 35 Ill. Admin. Code 242. On behalf of its Members, the Illinois Environmental Regulatory Group appreciates this opportunity to provide feedback on the proposal, pre-filed questions, testimonies, and comments in this proceeding. IERG is an Illinois not-for-profit corporation of forty eight (48) Member companies including the chemical, food, pharmaceutical, transportation equipment, energy, heavy manufacturing, steel, oil, and power generation sectors that are regulated by governmental agencies that promulgate, enforce, or administer laws, rules, regulations, and other policies. IERG represents the interests of its Members in the development of environmental laws, regulations, and policies at the state level in Illinois and at the federal level. Since IERG's diverse membership includes sectors reliant on



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traditional combustion engines and fossil fuels, the proposed amendments will have a direct and significant impact on its members.

For the reasons detailed below, IERG respectfully opposes the proposed amendments.

I. Background

On June 26, 2024, the Sierra Club, Natural Resources Defense Council, Environmental Defense Fund, Respiratory Health Association, Chicago Environmental Justice Network, and Center for Neighborhood Technology (collectively, “Rule Proponents”), filed rule proposal R2024-017, urging the Illinois Pollution Control Board (“Board”) to adopt three motor vehicle emissions regulations to reduce damaging air pollution from light-, medium and heavy-duty vehicles in Illinois: the Advanced Clean Cars II (ACC II) regulation, the Advanced Clean Trucks (ACT) regulation, and the Heavy-Duty Low NO_x Omnibus (Low NO_x) regulation. On December 2, 2024, the Board conducted its first hearing on this matter, followed by the second hearing on March 10 and 11, 2025. On March 14, 2025, the Hearing Officer issued an order establishing April 28, 2025, as the deadline for all public comments on the proposal, including post-hearing public comments.

II. The Feasibility of Proposed EV Mandates is Undermined by Infrastructure and Economic Constraints in Illinois

Illinois currently lacks the infrastructure necessary to support the implementation of sweeping electric vehicle (EV) regulations. Building out this infrastructure—such as charging networks, grid enhancements, and increased renewable energy capacity—would require significant time, investment, and coordination among industry participants. These costs will inevitably be passed down to Illinois businesses reliant on transportation and Illinois consumers, including those who are not ready or willing to transition to EVs.



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As EV adoption increases, electricity demand will rise sharply. Charging thousands or even millions of EVs daily will place substantial strain on the state's power grid. At present, Illinois does not have a sufficient clean energy supply to meet this increased demand sustainably. The adoption of aggressive EV regulations without adequate preparation could impose immediate financial burdens on both consumers and businesses, while also introducing challenges in power generation, transmission, and reliability. This transition, if rushed, risks significant disruption to Illinois' economy.

IERG believes that given the scope and complexity of the proposed electric vehicle transition—and the profound impacts it will have on Illinois' energy infrastructure, economy, and consumers—such a policy shift is more appropriately addressed through formal legislation rather than regulatory action. Legislation allows for a more transparent and democratic process, with input from a broader range of stakeholders, including industry experts, local governments, utilities, and the public. As the Board is well aware, the Illinois legislature has repeatedly declined to advance similarly framed legislative proposals—an outcome that, in IERG's view, clearly reflects the lack of broad consensus or readiness for such sweeping measures. This further underscores the importance of addressing a transition of this magnitude through the legislative process, where the full economic, infrastructural, and societal impacts can be properly debated and weighed.

III. Conclusion

While IERG fully acknowledges the importance of addressing climate change and advancing air quality goals, we remain deeply concerned that the proposed regulations are overly aggressive and misaligned with Illinois' current infrastructure and energy capabilities. Implementing such measures without legislative oversight or sufficient planning risks imposing significant economic burdens on both industry and consumers, while potentially undermining grid reliability and long-term sustainability. A more balanced, collaborative approach—grounded in legislation and supported by realistic timelines and investments—would better serve Illinois and its residents.



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Thank you for your time and attention to this matter.

Sincerely,

Trejahn Hunter

Legal Counsel

Illinois Environmental Regulatory Group

From: [Trejahn Hunter](#)
To: [Brown, Don](#); [Leoni, Carlie M.](#); [Horton, Vanessa](#)
Cc: [Kelly Thompson](#)
Subject: [External] IERG Comments - Part 242 Clean Cars and Trucks Standards (R2024-017)
Date: Monday, April 28, 2025 8:00:20 AM
Attachments: [Outlook-A black ba.png](#)
[IERG Comments - Proposed Clean Cars & Trucks Standards \(Part 242\).pdf](#)

Dear All,

Attached please find the Illinois Environmental Regulatory Group's Comments regarding the proposed Part 242 Clean Cars and Trucks Standards (R2024-017).

All the best,

Trejahn Hunter

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