



April 28, 2025

Illinois Pollution Control Board
60 E. Van Buren St., Ste. 630
Chicago, Illinois 60605

Comments in Support of Proposed Clean Car and Truck Standards (R2024-017)

My name is Kristina Hamilton and I am writing on behalf of the American Lung Association, an organization dedicated to saving lives by improving lung health and preventing lung disease through research, advocacy and education. A key pillar of the Lung Association's mission is to champion clean air for all, including the more than 1.5 million people living with chronic lung disease in Illinois and their families. We thank you for the opportunity to submit comments in support of adopting the proposed clean car and truck standards, which are critical to reducing air pollution in Illinois.

Since 1904, people living in America have trusted the American Lung Association to protect their lungs, whether it's researching treatments and cures for lung diseases or advocating for laws that protect the air we all breathe. Our history is full of milestones including significant public health achievements, ground-breaking research, and developing support communities for those impacted by lung disease. **Clean air is essential for healthy lungs.** We consistently urge policymakers to enact measures to ensure that the air we breathe is clean and safe from harmful pollution and to address climate change, which is a public health emergency.

We support the adoption of the clean vehicle standards—the Advanced Clean Trucks (ACT), Heavy-Duty Low-NOx Omnibus (HDO) and Advanced Clean Cars II (ACCII)—because of the air quality and lung health benefits these standards will provide for the communities we serve.

Transportation continues to be a leading source of harmful air and climate emissions in Illinois. The American Lung Association's ["State of the Air" 2025](#) report found that nearly all counties in Illinois with reported data received an "F" grade for high ozone days and most counties with reported data received a "C" or lower grade for particle. Heavy-duty transportation sources are disproportionate contributors to the poor air quality in Illinois.

Air pollution affects the health of everyone, but is particularly harmful for children, seniors, and people with pre-existing conditions, and disproportionately impacts people with lower incomes and people of color who are more likely to live near transportation corridors. Ozone ("smog") and particle ("soot") pollutants can cause various respiratory and cardiovascular illnesses such as asthma attacks, worsening COPD, heart attacks, and strokes.

The American Lung Association ["Zeroing in on Healthy Air"](#) report found that policies supporting a transition to zero-emission transportation powered by a clean electric grid in Illinois could generate \$59.5 billion in public health benefits, 5,410 avoided deaths, 138,000 avoided asthma attacks, and 670,000 avoided lost workdays.



Major disparities continue to exist in terms of access to clean air. The Lung Association's State of the Air report found that 93% of people of color in Illinois live in counties with a failing grade for ozone pollution, despite making up 41% of the population. More than 70% of those experiencing poverty live in a county with a 'C' or below grade. These discrepancies are driven by pollution in high-traffic corridors, in which nearby residents are more likely to be exposed to harmful air pollution impacts, are more likely to have lower incomes, and be people of color compared to the national population.

Furthermore, children are uniquely vulnerable to diesel pollution. Proportionate to the size of their bodies, children breathe in larger amounts of air than adults, which means air pollution exposes them to higher concentrations of toxic chemicals. Unfortunately, this also means children are at increased risk of worse long-term health outcomes and school performance from exposure to diesel pollution.

Finally, despite making up 6 percent of the on-road fleet in 2020, medium and heavy-duty vehicles generate 59 percent of ozone and particle-forming NOx emissions and 55 percent of particle pollution. The ACF and HDO are targeted particularly at addressing these high impact pollution sources and will support a long-term market signal to reduce this major source of unhealthy pollution.

We strongly support the request in the petition to adopt clean vehicle standards because they will have a tremendous positive impact on climate and health in the state of Illinois. Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink that reads "Kristina A. Hamilton".

Kristina A. Hamilton, MPH
Director, Advocacy, Illinois
American Lung Association