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To: Brown, Don

 Subject:
 [External] Docket R 2024-017 PC

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In response to the Illinois Environmental Protection Agency's comments on R24-17:

I am profoundly disappointed in IEPA's opposition to protective tailpipe emissions standards that would save hundreds of Illinoisan lives each year. Its comments showing deference to industry polluters and a federal administration bent on dismantling environmental protections is a betrayal of its duty to protect public health and the environment. Now more than ever, Illinois must show leadership, not surrender in simpering timidity to political pressure and fear mongering. It is folly to abdicate the responsibility of adopting public health protections to the General Assembly, where paid lobbyists can drown out everyday Illinoisans' voices. The public made our voices heard by petitioning this case to the Pollution Control Board, demanding our government act to protect us. Despite our overwhelming support of the standards in the public comments, IEPA did not address our concerns of public health or air pollution once.

I have been an EV owner since 2017, and while I commend the passage of the Climate and Equitable Jobs Act, I disagree that Illinois policy already sufficiently promotes EVs, much less to suggest that further action is unnecessary. CEJA's EV purchase rebate program is very popular and therefore consistently oversubscribed, maintaining barriers in place for lower-income individuals who still want an EV. Charging infrastructure has definitely expanded, but gaps remain where private investment lags in Black, brown, and rural communities. Local governments like the City of Chicago have implemented policies to address charging access inequities, but as its comments in this case affirm, further state support is needed through clean vehicle standards to expand vehicle availability and supply and attract more private investment.

I can personally attest to how clean vehicle standards promote EVs and benefit the consumer. I once considered driving to Buffalo, NY, the closest "Clean Car" state at the time, because no dealer here had the EV model I was interested in. The market and model availability have expanded since then, but it still remains the case that manufacturers prioritize states that have adopted these standards with more vehicle supply, deals, and a resulting larger used vehicle market. Illinois' failure to progress, rather than the standards themselves, is in fact what has restricted my individual choice as a consumer.

Lastly, I find it misleading to claim that these standards "limit consumer choice by banning the sale of a product... currently owned and relied upon by millions of Illinois residents and businesses." In recent history, countless products were discovered to harm public health or the environment and its sales were subsequently limited or banned, such as lead-based paint or asbestos. These efforts were always championed by federal and state environmental agencies. Industry consistently resists and pushes the government to prioritize profit over public health, such as in the overruling of the EPA asbestos ban. But, industry has shown it can innovate under pressure. After the Clean Air Act required tailpipe emissions reductions, and leaded gasoline began to be phased out, manufacturers claimed it was impossible to comply with new emissions standards. Once they were required to provide catalytic converters, automakers adapted, and today's vehicles emit fewer harmful pollutants than before. Air pollution remains a crisis, however. There is no reason to believe industry cannot rise to the occasion now, with an already proven zero-emission technology that can save hundreds of lives and billions of dollars.

Thank you, Neda Deylami