



600 South Second Street, Suite 403
Springfield, IL 62704

Illinois Environmental Protection Agency
2520 W. Iles Ave.
Springfield, IL 62704

Re: Proposed Comprehensive Climate Action Plan

The National Federation of Independent Business (NFIB) is the largest small-business advocacy organization in Illinois and the nation, representing more than 10,000 small-business owners in Illinois alone. NFIB member businesses are independently owned and reflect the diversity of Illinois' small-business community, including small businesses in retail, construction, transportation, hospitality, professional services, manufacturing, and agriculture.

NFIB is concerned about the recommendations contained in the proposed comprehensive climate action plan and the process utilized to gather (or not gather) stakeholder input.

It is noteworthy that, when listing its "stakeholder" engagement, the plan makes no reference to small businesses or any association representing small businesses. As it notes: "[s]takeholders from across Illinois, including environmental coalitions, community-based organizations, public health professionals, academic institutions, and industry experts, have provided extensive feedback on the state's climate planning." (Page 63) There is no indication in the plan that small businesses—particularly in trades such as landscaping, homebuilding, transportation, agriculture, or other sectors directly impacted by these recommendations—were consulted.

Small businesses perform a vital role in Illinois, providing jobs, services, and investment in communities across the state. In recognition of the critical function small businesses play in Illinois' economy and society, the state's energy and environmental policies should consider their needs, their employees, and the unique range of goods and services small businesses provide to their customers.

Measures included in the proposed comprehensive climate action plan would negatively impact Illinois' small-business community. For example, NFIB member small businesses oppose:

- The banning of gas-powered landscaping equipment
- The elimination of natural gas hook-ups in new builds
- Competition-limiting labor requirements that restrict small businesses' ability to compete for energy contracts
- Energy policies that drive up the demand for and the cost of electricity in this state

These measures, if implemented, would put new constraints on small businesses already struggling with rising energy and insurance costs, burdensome regulations, and high property taxes.

The proposed plan further fails to account for the projected energy capacity shortfalls outlined in the 2025 Resource Adequacy Study published by the Illinois Commerce Commission, the Illinois Power Agency, and the Illinois Environmental Protection Agency. The study highlighted concerning trends in Illinois' energy market due to growing demand and the policy-driven shuttering of traditional power-generating facilities in the state.

NFIB believes that the department should reconsider its process for developing this report and broaden it to include small-business stakeholders to reflect the key role small businesses play as job creators, investors, and engines of growth in local economies across the state.