

**2020 Air Monitoring Network Plan Response to Comments**

Comment #	Commenter	Date of Comment	Comment	Response
1	EPA Region 5 (Michael Compher)	May 23, 2019	<p><u>Received via email</u>: Region 5 has reviewed WDNR’s 2020 ANP and we have the following comments on the ozone network:</p> <p>1. <u>Relocation of the Milwaukee SER DNR Ozone Monitor to Havenwood State Park</u>: The Milwaukee SER ozone monitor currently captures the highest ozone levels in the attainment portion of Milwaukee County with a 2016-2018 design value of 0.069 ppm and a 2018 4<sup>th</sup> high of 0.071 ppm. Since WDNR will need to relocate this monitor, WDNR should identify a nearby location in the northeast direction relative to its current location (either due north or due east would be acceptable as well) rather than a location to the northwest or south. Studies by Wisconsin DNR staff have consistently indicated that the highest levels of ozone are found along the shoreline of Lake Michigan. Ozone monitoring sites, especially those sites categorized as population exposure, are expected to characterize the areas of greatest ozone levels to which the public may be exposed and are best placed slightly downwind of the urban core area. Therefore, it would not be appropriate to relocate this monitor to an area that we expect to have lower ozone concentrations. There appear to be many potential public green spaces such as parks, and recreational areas northeast of the current SER monitoring site which WDNR could evaluate as suitable relocation sites. We can provide feedback on any potential alternate locations you identify.</p>	<p>1. DNR does not have the option of maintaining the SER site due to future plans for the property where it is currently located. The Milwaukee-Waukesha-West Allis Metropolitan Statistical Area (MSA) is required to maintain two ozone sites. The SER site is the 6<sup>th</sup> site located in the MSA. EPA has indicated the Havenwoods site would not be an acceptable alternative location; therefore, that option will be removed from the plan.</p> <p>DNR will continue to work with EPA to reach an agreeable solution.</p>

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			<p>2. <u>Exclusion of Sheboygan Kohler-Andrae Ozone Monitor:</u> WDNR’s proposed 2020 ANP excludes the Sheboygan Kohler-Andrae ozone monitoring site, an existing SLAMS site that is designated as a maximum concentration and transport site. Consistent with our June 21, 2018 letter to WDNR, the exclusion of the Sheboygan Kohler-Andrae ozone site renders WDNR’s ANP incomplete and not approvable because it fails to meet the requirements of 40 CFR, Part 50.10(a)(1) and 40 CFR Part 58, Appendix D, 4.1(b). The former requires that the ANP document the established and maintained air quality monitoring network and the latter requires that the ANP provide for a network of ozone monitors that includes monitoring sites located to record maximum concentrations considering factors such as “population, geographic size, population density, complexity of terrain and meteorology, adjacent ozone monitoring programs, air pollution transport from neighboring areas, and measured air quality in comparison to all forms of the ozone standard. Networks must be designed to account for all of these area characteristics.” Finally, the Sheboygan Kohler-Andrae ozone monitoring site is the design value site for the Sheboygan County nonattainment area. It has and continues to violate both the 2008 and 2015 ozone NAAQS with a design value of 0.079 ppm and has consistently measured elevated levels of ozone since its establishment in 1997. The design value monitor in a nonattainment area is critical for tracking ozone design values over time for attainment planning purposes and maintenance when the area attains the ozone NAAQS and is redesignated to attainment. Therefore, we recommend including the Sheboygan Kohler-Andrae ozone site into the 2020 ANP prior to submittal to U.S. EPA so that the plan is approvable.</p>	<p>2. Effective March 30, 2018, Act 159 created a new section, 285(3), in the air monitoring section of chapter 285, Wisconsin State Statute. Under the authority of the new statutory section, the department may not include the air monitoring site located in Kohler-Andrae State Park in Sheboygan County in the state’s monitoring network plan. If EPA does not approve the initial network plan submitted by the department, the department may submit a revised plan that includes the air monitoring site at Kohler-Andrae. To comply with state law, the Sheboygan Kohler Andrae monitor was omitted from the 2020 annual network plan. As outlined in 285.72 (3)(b)(c) if the federal environmental protection agency does not approve the initial plan submitted by the department under par. (a), the department may submit a revised plan that included the air monitoring site located at Kohler-Andrae State Park in Sheboygan County. WI Statute 285.72 (3)(b)(c) allows for DNR to revise the draft plan to include the Sheboygan Kohler-</p>

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				<p>Andrae monitoring site.</p> <p>Based on this comment. The final annual monitoring plan will include the Sheboygan Kohler-Andrae monitoring site.</p>
2	Rebecca Clarke and others	May 28, 2019	<p>Please accept our comments on proposed changes to the "Wisconsin Department of Natural Resources 2020 Air Monitoring Network Plan." Specifically, we are concerned regarding not using the Kohler Andrae monitor as part of the DNR's air monitoring network going forward.</p> <p>In Re: "Wisconsin Department of Natural Resources 2020 Air Monitoring Network Plan."</p> <p>Ms. Praedel,  SORA - Sheboygan Ozone Reduction Alliance  735 Fairway Drive  Sheboygan, WI 53081  920-395-6609</p> <p>We are writing in regards to the proposed change to remove the Sheboygan Kohler-Andrae monitor from the 2020 Air Monitoring Network Plan. This will make it difficult for the residents of Sheboygan to receive accurate air quality notifications. The unique air quality issues of this county, which have existed for decades, <b>require more monitoring, not less.</b> We represent the 53,000 people affected within the 3.2 miles that has been designated nonattainment. We are disappointed that much of the evidence supporting the DNR's position is</p>	<p>Effective March 30, 2018, Act 159 created a new section, 285(3), in the air monitoring section of chapter 285, Wisconsin State Statute. Under the authority of the new statutory section, the department may not include the air monitoring site located in Kohler-Andrae State Park in Sheboygan County in the statewide monitoring network plan. If EPA does not approve the initial network plan submitted by the department, the department may submit a revised plan that includes the air monitoring site at Kohler-Andrae. To comply with state law, the Sheboygan Kohler Andrae monitor was omitted from the 2020 annual network plan. As outlined in 285.72 (3)(b)(c) If the federal environmental protection agency does not approve the initial plan submitted by the department under par. (a), the department may submit a revised</p>

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			<p>based on a short term study.</p> <p>The three-year study from 2014-2016 is insufficient to make a determination that will have a decades-long impact on air quality planning. The most recent data from 2016-2018 already shows that the Haven monitor is violating 2015 NAAQS. In 2018, 1 in 4 of the measured days at the Haven monitor were above World Health Organization ozone standards. The EPA is likely to designate Shoreline Sheboygan County as serious in 2020, and the American Lung Association has ranked Sheboygan as the 20th most ozone polluted city in U.S.</p> <p>The proposed change in air monitors was not called for by Sheboygan residents; most aren't even aware it's happening. This change is only being supported by businesses and legislators that stand to gain the most, at the cost to public health.</p> <p>As citizens, the difficulty in finding information is frustrating. We've encountered broken web links on public notice letters, and it is inconvenient to attend public hearings in Madison. Issues affecting our area should be more thoroughly disclosed in our area. There needs to be more transparency in this process.</p> <p>These are the facts:</p> <ol style="list-style-type: none"> <li>1. <b>Who wants this change:</b> It is being promoted by local chambers of commerce, a few local businesses, the Wisconsin Manufacturers and Commerce, Senator LeMahieu and Representative Katsma and Congressman Glen Grothman. <b>While this change could help some businesses it does nothing to improve the</b></li> </ol>	<p>plan that included the air monitoring site located at Kohler-Andrae State Park in Sheboygan County. WI Statute 285.72 (3)(b)(c) allows for DNR to revise the draft plan to include the Sheboygan Kohler-Andrae monitoring site.</p> <p>The final annual monitoring plan will include the Sheboygan Kohler-Andrae monitoring site.</p> <p>The statewide monitoring network is spatially distributed to provide air quality information based on geographic coverage and population density. As required by the Clean Air Act, the U.S. EPA sets National Ambient Air Quality Standards (NAAQS) for criteria pollutants, which include particulate matter, NO<sub>2</sub>, ozone, CO, SO<sub>2</sub> and lead. The DNR conducts ambient air monitoring in locations directed by federal requirements to measure concentrations of criteria pollutants for comparison to the appropriate NAAQS. Sheboygan County is federally required to have one ozone monitoring site. The state maintains two sites in Sheboygan county specifically</p>

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			<p><b>quality of our air and could worsen it.</b></p> <p>2. <b>What data supports the change:</b> The legislature’s solution was to move the air quality monitor 3.2 miles away from Lake Michigan, where the ozone problem is not as severe. Unfortunately, the inland monitor is barely in attainment for 2015 standards (one part per billion!) while the lake-side readings continue to be dangerously high. The data does not support this change.</p> <p>3. <b>What is the source of the problem:</b> The majority (80%) of ozone causing agents in Sheboygan County come from outside the state, including up the lake from IL, IN, and MKE. Our local, state and federal leaders failed to partner with their colleagues in other states and MKE to actually address the problem. We need more monitoring and more study of the sources and movements of ozone causing agents as they are produced in and outside of our county.</p> <p>4. <b>Is the change needed to save/create jobs:</b> Since 2008, Sheboygan County has been working towards healthier air under EPA regulation. Legislators and lobbyists have argued that EPA regulation harms profits. However Sheboygan county still leads the state in manufacturing with 2,500 open jobs today. <b>In Sheboygan we don’t have to sacrifice our health for jobs.</b></p> <p>5. <b>What should be done:</b> Through the EPA’s Good Neighbor Policy and CAIR (Clean Air Interstate Rule), we have seen national reductions in acid rain and fine</p>	<p>designed to allow for planning for lakeshore ozone gradient determination.</p> <p>Additionally, as required by 40 CFR Part 58 Appendix D 5(h), DNR has implemented an enhanced ozone monitoring plan (EMP).</p> <p>EMPs are required in areas with a moderate NAA classification and above. DNR worked closely with EPA Region 5 to design a multi-year, phased EMP that includes monitoring activities and study activities that will provide more information and insight into the state’s complex lakeshore ozone issues. EPA approved an enhanced ozone monitoring plan as part of its approval of Wisconsin’s 2019 ANP. As part of its continued commitment to enhanced ozone monitoring, DNR plans to:</p> <ul style="list-style-type: none"> <li>• Continue monitoring ozone concentrations at additional sites beyond those required.</li> <li>• Continue monitoring ozone precursors (NO<sub>x</sub> and VOCs)</li> </ul>

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			<p>particulate matter. Indeed, our own businesses have reduced their ozone causing agents by 49%. Through cooperation on a regional basis this issue can be addressed, but it takes leadership and an actionable plan.</p> <p><b>Falsely declaring that we no longer need to use data from the Kohler-Andrae monitor for planning is bad science and bad policy.</b> The changes could worsen our air quality and areas beyond. The 53,000 Sheboyganites who live, work and play within 3 miles of Lake Michigan deserve better leadership and protection of their health.</p> <p><b>Therefore, we, the citizens of Sheboygan County, demand the following:</b></p> <ul style="list-style-type: none"> <li>● <b>Local, state, federal leaders who will address the problem at the source;</b></li> <li>● <b>Multi-source, multi-state participation;</b></li> <li>● <b>The formation and implementation of an ozone reduction plan along Lake Michigan that meets 2015 standards;</b></li> <li>● <b>Scientific monitoring of local air quality and health impacts that is not subject to political pressure.</b></li> </ul> <p>Rebecca Clarke - 735 Fairway Drive Sheboygan, WI 53081  Wilson Towne - Sheboygan, WI  Rebecca Duquesnoy - 417 Clifton Avenue Sheboygan, WI 53083  414-881-4825  Angela Bender - 320 Morning Drive, Plymouth, WI 53073  Josh Bender - 320 Morning Drive, Plymouth, WI 53073</p>	<p>at additional monitors beyond those required.</p> <ul style="list-style-type: none"> <li>● Analyze data from the 2017 Lake Michigan Ozone Study (LMOS 2017) and consider the results of the study in future regulatory submittals and modeling.</li> <li>● Install upper air meteorology instrumentation</li> </ul> <p>The enhanced monitoring and analysis of the results from LMOS 2017 should provide significant additional insights into the mechanisms and dynamics of ozone formation and transport along Wisconsin's Lake Michigan shoreline.</p> <p>Transparency throughout the statewide Annual Network Plan process is provided through the standard State of Wisconsin public comment process. The annual meeting that is held in Madison is beyond what is federally required.</p>