

November 24, 2008

Mary Ann Dolehanty, Acting Permit Section Supervisor
Michigan Department of Environmental Quality
Air Quality Division
P.O. Box 30620
Lansing, MI 48909-7760
deq-aqd-ptipubliccomments@michigan.gov

Re: Draft Permit to Install, Permit No. 317-07, Wolverine Power Supply Cooperative, Inc.

Dear Ms. Dolehanty,

I am writing to urge you to deny the air permit-to-install application for the Wolverine Power Supply Cooperative's proposed coal plant ("Wolverine Coal Plant") because of the significant global warming impacts that the plant would have. Please accept this letter as my comments on the Draft Permit to Install for Wolverine Coal Plant. As proposed, the application and draft permit fail to satisfy the requirements of the federal Clean Air Act and Michigan state laws because they do not impose strict and binding limits on the Wolverine Coal Plant's emission of 3.5 million tons of greenhouse gases per year. The public notice for the Proposed Coal Plant states that written comments will be accepted through November 24, 2008. Therefore, these comments are timely submitted.

Electricity generation is already the leading contributor to the state's greenhouse gas emissions accounting for in excess of 30% percent of such emissions. Wolverine's proposed 600 megawatt plant would add to that global warming pollution by emitting almost 200 million tons of CO₂ over its expected 50 year life, with no requirements for controlling this pollution.

Allowing this pollution runs contrary to the conclusive and incontrovertible body of scientific evidence that shows that the planet is warming and greenhouse gas emissions from human activities are largely responsible. This warming of the planet poses the threat of serious environmental, public health, and economic harm. The U.S. Supreme Court has found harms associated with climate change caused by CO₂ to be "serious and well recognized." These harms include a precipitous rise in sea levels, severe and irreversible changes to natural ecosystems, "a significant reduction in water storage in winter snowpack . . . with direct and important economic consequences," an increase in the spread of disease, and an increase in the ferocity of weather events.

Not only are the effects of climate change felt on a global and continental scale, but there will be severe negative consequences for the State of Michigan as well. The potential harms to Michigan include a 1.5 to 8 foot decline in water levels in the Great Lakes, a significant increase in the number of extreme heat days and severe weather events, substantial disruption to agriculture and forestry in the state, and loss of commerce and tourism. Consequently, absent significant reductions in heat-trapping gases, the health of Michigan's citizens and the foundations of Michigan's economy are at risk.

The Michigan DEQ has the legal authority and duty to either require strict limits on CO2 emissions from the Wolverine Coal Plant or to deny the permit for the plant in light of the serious climate change impacts that the plant would exacerbate. For example, the Clean Air Act requires limits on CO2 emissions because CO2 is a pollutant “subject to regulation” under the Act. In addition, the Michigan Environmental Protection Act requires the pursuit of cleaner alternatives – such as energy efficiency and renewable energy – that would minimize or avoid the pollution, impairment, and destruction of the environment that the Wolverine Coal Plant would cause.

It is widely known that Michigan and the United States as a whole must reduce its CO2 emissions by 60-80% by 2050 in order to avoid catastrophic climate change. The permitting of the Wolverine Coal Plant, and other coal plants, without stringent limits on their emission of CO2 would severely hinder the state’s ability to achieve these critical reductions. Therefore, Michigan DEQ should deny the permit as proposed so that cleaner alternatives can be pursued.

Sincerely,

SIGN LETTER WITH THE FOLLOWING REQUIRED INFORMATION *

Your Title (e.g. Mr., Ms., Dr.):

Your Full Name:

Your Company Name (if applicable):

Your Full Mailing Address (include ZIP Code):

OPTIONAL INFO

Your Daytime Phone No. (include area code and extension):

Your E-Mail Address (provide if you wish to be notified of future updates regarding this application):

* This information is required, by the rules of public comment