

## 2026 Air Monitoring Revised Network Plan Response to Comments

Comment #	Name of Commentor	Date of Comment	Comment	Response
1	Pam Savoy	6/6/2025	Email comment: Hello Mr Wolf,I am writing to make comment on the Wisconsin DNR 2026 Air Monitoring Network Plan. Superior is home to the only oil refinery in the state as well as other industry. The nearest PM 2.5 air monitor is located in Duluth Mn. This monitor is placed east of the Cenovus Superior Refinery. The annual predominate winds here are westerly. Information that I have learned from EPA websites about air monitor placement, recommends that air monitors be placed downwind of a refinery/industry in order to capture the potential impact of emissions on nearby communities. The air monitor in Duluth Mn is upwind of the industry here. Please consider Superior in the 2026 Air Monitoring Network Plan.	<b>Response to comments related to adding a regulatory monitor in Superior, Wisconsin.</b> 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. Environmental Protection Agency (EPA) sets National Ambient Air Quality Standards (NAAQS) for six criteria pollutants, which include particulate matter (PM), nitrogen dioxide (NO <sub>2</sub> ), ozone (O <sub>3</sub> ), carbon monoxide (CO), sulfur dioxide (SO <sub>2</sub> ) and lead (Pb). The Wisconsin Department of Natural Resources (DNR) Air Management Program conducts ambient air monitoring in locations directed by federal requirements to measure concentrations of criteria pollutants for comparison to the appropriate NAAQS.  The Clean Air Act requires the EPA to periodically set and review NAAQS. The NAAQS are designed to protect public health based on the latest available science. On February 7, 2024, the EPA finalized a more stringent NAAQS for PM <sub>2.5</sub> . A revised NAAQS starts a designations process in which the EPA determines the areas of the country that are in 'attainment' of the NAAQS and those that are in 'nonattainment'. The EPA must make final designations for the new PM <sub>2.5</sub> NAAQS by February 2026 based on 2022-2024 monitoring data. All areas of Wisconsin are below EPA's more stringent NAAQS for PM <sub>2.5</sub> based on the 2022-2024 monitoring data values. Along with reviewing the level of the NAAQS, the EPA also completed a review of the monitoring requirements for PM <sub>2.5</sub> and finalized updated requirements on February 7, 2024.  The DNR's air monitoring network meets all applicable monitoring requirements set by the EPA's Code of Federal Regulations (40 CFR Part 58). This monitoring network is funded by federal grant money. The DNR does not receive funding to support monitoring beyond what is federally required.  The EPA provided DNR with a summary of an analysis comparing publicly available PM <sub>2.5</sub> air sensor data from Superior to regulatory
2	Kathryn McKenzie	6/8/2025	Email comment: Mr. Wolf,My understanding is that the WDNR is formalizing its air monitoring for 2026. As a resident of Superior for 70+ years and a resident in my current home for 50+ years I have lived through many iterations of refinery owners and compliance. In the beginning with the current owners the air was much better than it had been under previous ownerships. I have a purple air monitor on my home and have had it since shortly after the last explosions. My monitor reads lower than the other two in the city but I can adjust for the difference. If information given on a WLWV presentation on the city of Beloit's upwind air monitor is correct then it appears the same thing is happening in Superior. Other information	

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			<p>given at that presentation states an additional annual health cost in Beloit because of their peak power plant at \$50M. The information given then also gives an annual \$50M in health cost to the citizens of Superior because of the refinery at \$50M with the potential to double if the proposed peak power plant is operational. I want Superior to have an adequate state of art air monitor that covers any wind direction. After the last refinery explosion I am aware that no monitors were available here and the federal officials needed to “borrow” from MN. I am aware that the start up and annual costs would be more than the state has so far been willing to pay. Aren’t the lives of the citizens in this city worth the expense? This health issue should not be a political one. Are we a throw AWAY ZONE as one of the past EPA officials has suggested? I recall that one of the city fathers who was a judge and brought the original refinery to this city once stated to me as we discussed the next long ago permitting to this refinery : “No do-gooding socially activist woman is going to shut this refinery down.” I was then the president of the Douglas County League of Women Voters. That is not my intent now and never was. In reading through the WDNR file once in the Superior office I read—from the then owners “Our little pot of gold.” Yes ! it’s political and always has been. Do something good for Superior’s citizens—monitor downwind soon.</p>	<p>air monitoring data collected nearby in Duluth, Minnesota. Data for these analyses were accessed and analyzed by the EPA using the <a href="#">Air Sensor Network Analysis Tool</a>, a free, opensource R shiny application that can be used to analyze air sensor network data to evaluate sensor performance and local air quality conditions.</p> <p>Sensors in Superior, Wisconsin, showed similar trends and values to two regulatory monitors and additional sensors located in the adjacent City of Duluth, MN. Annual mean concentrations from the sensors for 2024 in Superior were near or well below levels measured at the regulatory monitoring sites in Duluth. All sensors and monitors in Duluth and Superior were about 3 ug/m3 or more below EPA’s 2024 PM2.5 NAAQS of 9 ug/m3.</p> <p>Along with air quality monitoring, air pollution control permits are another tool that the DNR uses to ensure the air quality is protected when new or existing facilities construct or change processes. Before the DNR can issue an air pollution control permit, state and federal laws and regulations require the DNR to assure that the worst-case air pollution emissions from a facility will not cause pollution concentrations in the vicinity to exceed the NAAQS set by the EPA.</p> <p>The DNR issued air pollution control permits for the rebuild of the Superior Refinery in 2019, 2020, and 2022. The air dispersion modeling analysis conducted in support of those permits considered emissions from the Refinery as well as other industry in the area. The analysis predicted air pollution concentrations that could occur in the air around the facility and found that these concentrations did not exceed any applicable National Ambient Air Quality Standards.</p> <p>One comment referenced the Nemadji Trail Energy Center (NTEC). The DNR authorized an air pollution control permit for (NTEC) on 09/19/23. The air dispersion modeling analysis conducted for the NTEC permit review considered emissions from the proposed NTEC facility as well as other industry in the area, including the refinery. The analysis predicted air pollution concentrations that</p>

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3	Patricia Soliday	6/9/2025	<p>Email comment:</p> <p>As a resident of Superior (or Douglas County), I'd like to have better air quality monitoring in our City.. Currently, we have the only oil refinery in the state located in the heart of Superior, next to schools and homes. Within the last month I have noticed an odor coming from the Cenovus Refinery. Just like the odor Murphy oil sent through our City when I was a child here. My hope is the DNR will approve to update air quality monitoring in our city and provide direct monitoring of the chemicals released into our backyards. It is not sufficient to rely on data from another city for our health and safety. The continued effort to build the NTEC project on the shores of the Nemadji River, less than a mile from Lake Superior, will likely be an additional detriment to our air quality. I would hope 'actual' readings of air, in our City, would be done correctly before any further discussion of NTEC. We citizens of Superior are entitled to 'clean air'! Please help us obtain the necessary equipment</p> <p>Thank you for your time,</p>	<p>could occur in air around the facility and found that these concentrations did not exceed any applicable National Ambient Air Quality Standards. At the request of the permit applicants, the DNR revoked the construction permit for NTEC on 10/17/2024.</p> <p>The <a href="#">Air Permit Search Tool</a> allows you to find information on individual air pollution control permits as well as view or download copies of the actual permit and associated documents for businesses in Wisconsin.</p> <p><b>Response to Comments # 1-9</b></p>
4	Abby Novinska-Lois	6/10/2025	<p>Email comment:</p> <p>As a public health professional, I am writing in response to the proposed WI DNR Air Monitoring Network Plan. In particular, I'd like to urge the Department of Natural Resources to install a regulatory-grade PM2.5 monitor in a location that can monitor air pollution from the gas plant in Beloit (Rock County) and the oil refinery in Superior (Douglas County).</p> <p>Fine particulate matter is a health hazard linked to heart disease, lung function,</p>	

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			cancers, birth outcomes, and early death. Our communities deserve protection from this criteria pollutant. Yet, there is currently a lack of regulatory monitoring in areas downwind of large polluters where exposure may be most acute and consistent.	
5	Robert Paine	6/10/2025	<p>Email comment: Dear Mr. Wolf, This plan has a major flaw! It does not even mention the Oil Refinery in Superior, WI 54880 let alone address it. Professionally I won't sign off on it. I did a simple Google Gemini search "Should the State of Wisconsin do air monitoring of an oil refinery in their State?" Here is the Answer: Should the State of Wisconsin do air monitoring of an oil refinery in their State? Yes, the State of Wisconsin should definitely conduct air monitoring of any oil refinery within its borders. Here's why:</p> <ul style="list-style-type: none"> <li>• Public Health Protection: Oil refineries emit a variety of hazardous air pollutants, including sulfur dioxide, nitrogen oxides, particulate matter, volatile organic compounds (VOCs) like benzene, toluene, and xylene, and heavy metals like lead and nickel. These pollutants are linked to serious health problems such as respiratory issues (asthma, bronchitis), cardiovascular disease, neurological damage, reproductive harm, and an increased risk of various cancers (leukemia, lung, pancreatic). Communities living near refineries often face disproportionately higher risks of exposure.</li> <li>• Environmental Impact: Emissions from oil refineries can contribute to poor air</li> </ul>	

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			<p>quality, acid rain, and regional haze, impacting ecosystems and visibility.</p> <ul style="list-style-type: none"> <li>• Regulatory Compliance: The U.S. EPA sets National Ambient Air Quality Standards (NAAQS) for common air pollutants. States, like Wisconsin, are required by the Clean Air Act to monitor and ensure compliance with these standards. The Wisconsin Department of Natural Resources (DNR) already operates a statewide air quality monitoring network to achieve this.</li> <li>• Transparency and Accountability: Air monitoring provides data that allows the public to understand the air quality in their communities and hold facilities accountable for their emissions. This data can also be used to evaluate the effectiveness of pollution control measures.</li> <li>• Emergency Response and Planning: In the event of an incident like an explosion or leak at a refinery, air monitoring data is crucial for assessing the extent of the plume, informing evacuation orders, and guiding emergency response efforts.</li> </ul> <p>Current Situation in Wisconsin: The Wisconsin DNR already has an air quality monitoring network in place, which measures various criteria pollutants. They also provide support and technical expertise to facilities that are required to conduct ambient air monitoring as part of a permit condition, and they review monitoring plans and data reports.</p> <p>While Wisconsin has regulations and monitoring in place for air quality generally, the specific impacts of an oil refinery warrant dedicated and thorough</p>	

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			<p>monitoring to protect the health of nearby communities and the environment. Given the potential for significant health and environmental consequences from refinery emissions, robust air monitoring is not just advisable, but essential.</p> <p>Mr. Wolf, This oil refinery produces 400,000 barrels per day of heavy oils, gasoline and other dangerous chemical by-products. In 2018 this refinery had an oil tank explosion and fire that produced black smoke that could be seen for miles along with hundreds being evacuated. The EPAs air sensors in Minnesota did not even detect this disaster? Since then this refinery was completely rebuilt and is producing 2-3 times more product than it ever did. The State must address this issue. Why?</p> <p>Here is one good reason: Douglas County where the City of Superior is located has a 10% higher death rate from cancer than the rest of the Counties in Wisconsin according to DNR cancer reports.</p>	
6	Alexis Abrahamson	6/10/2025	<p>Email comment:</p> <p>Dear Mr. Wolf,</p> <p>As a resident of Superior (or Douglas County), I'd like to see better air quality monitoring. Currently, we have the only oil refinery in the state located in the heart of Superior, next to schools and homes. (Here if you've noticed odors you could write something like: I've noticed .... )</p>	

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			I'd like the DNR to update air quality monitoring in our city and provide direct monitoring of the chemicals released into our backyards. It is not sufficient to rely on data from another city for our health and safety.	
7	Harry O'Davis	6/10/2025	<p>Email comment:</p> <p>Mr. Wolf,</p> <p>In Wisconsin we value our clean, healthy air as a natural resource. So monitoring it makes economic sense.</p> <p>In Douglas County, we have industries, most notably the Cenovus Refinery, which have major impacts on the air quality. These impacts cannot be effectively monitored currently; prevailing winds often carry our pollutants far from the closest regulatory monitor in Minnesota. I support having a temporary regulatory monitor strategically placed in Superior, so the community can make planning decisions based on accurate air quality information.</p>	
8	Patty Leir	6/11/2025	<p>Email comment:</p> <p>I am writing to ask the DNR to consider placing a temporary regulatory air monitor in Superior, Wisconsin and perhaps extra residential monitoring in the neighborhoods around the oil refinery. It surprises me that Douglas County is not listed on the Site Selection section of this plan. We have the only refinery in the state and according to the Wisconsin Public Health Tracking Data, the COPD rate of ER visits is higher in our county than the state average. Also, according to the 2019 Wisconsin Cancer report, Douglas County rates of several cancers are higher than the state average, especially lung cancer .</p>	

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			<p>Research shows that living within 0 - 10 miles of a refinery increases your cancer risk. Most of our entire city lives within this range. The EPA recommends that communities with a refinery should have air monitoring downwind, however, Superior does not have that. In the Network Plan, under Site Selection, it is mentioned that a monitor site can be chosen based upon the "highest concentrations of pollutants within a state based on known atmospheric chemistry of specific pollutants and wind patterns" The city of Superior is in the Lake Superior Basin which has its own weather that affects Superior.. The city of Superior can have fog and drizzle, but it can be completely different just a few miles outside of Superior as the elevation increases. Winds and temperatures can vary greatly in just a couple miles or less sometimes. We have several large industries along with the refinery. Of the six criteria pollutants that are listed in the report, we have many of those being emitted and no monitoring in the areas downwind of the industries. It seems that a good start would be to place a temporary regulatory air monitor that monitors PM 2.5 for 3-5 years to compare with the Duluth, MN air monitor and it should also measure for some criteria pollutants. Residential areas of concern around the refinery should also be considered for air monitoring to determine health impacts. We respectfully ask that you consider Superior, WI in your next air monitor plan. Thank you.</p>	



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9	Lynn Wohlwend	6/12/2025	<p>Email comment:</p> <p>Dear Mr. Wolf,</p> <p>As a resident of Superior, I'd like to see better air quality monitoring. Superior is home to the only refinery in the state and other heavy industry, but, currently, our air quality is monitored upwind from Duluth. I'd like to see direct monitors in Superior. I'd like the DNR to update air quality monitoring in our city and provide direct monitoring of the chemicals released into our backyards. It is not sufficient to rely on data from another city for our health and safety.</p> <p>Thank you for your time,</p>	
10	Lori Lange	6/2/2025	<p>Emailed Comment:</p> <p>Dear Monitor Section Manager Wolf, I am writing in response to the proposed WI DNR Air Monitoring Network Plan and to respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin. Specifically, I ask the Department of Natural Resources to install a regulatory-grade PM<sub>2.5</sub> monitor in a location that accurately and comprehensively captures emissions from Beloit's major stationary sources—particularly fossil fuel-based utility operations. As you are aware, PM<sub>2.5</sub> (fine particulate matter) poses significant risks to public health, especially for vulnerable populations such as children, the elderly, and those with existing respiratory or cardiovascular conditions. Despite this, there is currently a lack of sufficient regulatory monitoring in areas downwind of large polluters where exposure may be most acute and consistent. Without this level of monitoring, the true air quality</p>	<p><b>Response to comments related to Beloit, Wisconsin monitoring requests, emissions data and incorporation of other data sources associated with public health and citizen demographics.</b></p> <p>Improving air quality and protecting public health are top priorities for the Wisconsin Department of Natural Resources (DNR). As required by the Clean Air Act, the U.S. Environmental Protection Agency (EPA) sets National Ambient Air Quality Standards (NAAQS) for the six criteria pollutants, including fine particulate matter (PM<sub>2.5</sub>). The DNR conducts ambient air monitoring in locations as directed by federal requirements to measure concentrations of criteria pollutants for comparison to the appropriate NAAQS. Since 2014, all areas of Wisconsin have met the 2006 and 2012 EPA standards for particle pollution. This is primarily due to federal and state regulations that have led to decreases in emissions of PM<sub>2.5</sub> and other contributing pollutants.</p> <p>The Clean Air Act requires the EPA to periodically set and review the NAAQS. The NAAQS are designed to protect public health based on the latest available science. On February 7, 2024, the EPA finalized a more stringent NAAQS for PM<sub>2.5</sub>. A revised NAAQS starts a designations process in which the EPA determines the areas of the country that are in 'attainment' of the NAAQS and those that are in 'nonattainment'. The EPA must make final</p>

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			burden on Beloit residents—particularly those living in frontline and fenceline communities—will continue to be underestimated or overlooked entirely. We believe this step is not only necessary but urgent. In an era of rising environmental awareness, public health accountability, and climate urgency, the infrastructure we build today will shape our region's future resilience. A well-placed PM <sub>2.5</sub> regulatory monitor would demonstrate the DNR's commitment to science-based policy, environmental justice, and proactive community protection. Thank you for your time, your service, and your consideration of this important request.	<p>designations for the new PM<sub>2.5</sub> NAAQS by February 2026 based on 2022-2024 monitoring data. All areas of Wisconsin are below EPA's more stringent NAAQS for PM<sub>2.5</sub> based on the 2022-2024 monitoring data values.</p> <p>Along with reviewing the level of the NAAQS, the EPA also completed a review of the monitoring requirements for PM<sub>2.5</sub> and finalized updated requirements on February 7, 2024. The DNR's air monitoring network meets all applicable monitoring requirements set by the EPA's Code of Federal Regulations (40 CFR Part 58). This monitoring network is funded by federal grant money. The DNR does not receive funding to support monitoring beyond what is federally required.</p> <p>Instruments that collect regulatory ambient air data across Wisconsin are all Federal Reference Method or Federal Equivalent Method (FRM/FEM). These instruments go through a rigorous technical evaluation process before being designated FRM or FEM, resulting in methods that accurately and reliably measure pollutants in outdoor air. These methods can be used for comparison to the NAAQS and to determine implementation actions needed to attain the NAAQS.</p>
11	Jenny Hoople	6/2/2025	<p>Email comment:</p> <p>Dear Monitor Section Manager Wolf, I am writing in response to the proposed WI DNR Air Monitoring Network Plan and to respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin. Specifically, I ask the Department of Natural Resources to install a regulatory-grade PM<sub>2.5</sub> monitor in a location that accurately and comprehensively captures emissions from Beloit's major stationary sources—particularly fossil fuel-based utility operations. As you are aware, PM<sub>2.5</sub> (fine particulate matter) poses significant risks to public health, especially for vulnerable populations such as children, the elderly, and those with existing respiratory or cardiovascular conditions. Despite this, there is currently a lack of sufficient regulatory monitoring in areas downwind of large polluters where exposure may be most acute and consistent. Without this</p>	<p>Hourly PM<sub>2.5</sub> data are used to demonstrate compliance with the PM<sub>2.5</sub> NAAQS, calculate the air quality index (AQI), and allow for the protection of public health through forecasts and Air Quality Advisories. The DNR reports continuous data to Wisconsin's Air Quality website ( <a href="https://airquality.wi.gov/home/map">https://airquality.wi.gov/home/map</a> ), EPA's AIRNow website ( <a href="https://gispub.epa.gov/airnow/?showgreencontours=false">https://gispub.epa.gov/airnow/?showgreencontours=false</a> ) and eventually to EPA's final data repository, Air Quality System (AQS).</p> <p>Comments from Midwest Environmental Advocates infer that PM<sub>2.5</sub> levels in Beloit are likely the highest in the state and are comparable to, or possibly higher than, those at the nearest regulatory monitor located in Rockford, Illinois (IL). According to the EPA, the most recent 3-year PM<sub>2.5</sub> design value for Rockford, IL, averaging the annual means for 2022-2024 PM<sub>2.5</sub> data, was 8.3</p>

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			level of monitoring, the true air quality burden on Beloit residents—particularly those living in frontline and fenceline communities—will continue to be underestimated or overlooked entirely. We believe this step is not only necessary but urgent. In an era of rising environmental awareness, public health accountability, and climate urgency, the infrastructure we build today will shape our region's future resilience. A well-placed PM2.5 regulatory monitor would demonstrate the DNR's commitment to science-based policy, environmental justice, and proactive community protection. Thank you for your time, your service, and your consideration of this important request.	<p>ug/m3. Rockford's PM<sub>2.5</sub> annual mean for 2024 was 7.3 ug/m3. These values are below the PM<sub>2.5</sub> NAAQS of 9 ug/m3.</p> <p>The EPA provided DNR with a summary of an analysis it conducted comparing publicly available PM<sub>2.5</sub> air sensor data from Beloit to regulatory air monitoring data collected nearby in Rockford, IL. Data for these analyses were accessed and analyzed by the EPA using the <a href="#">Air Sensor Network Analysis Tool</a>, a free, opensource R shiny application that can be used to analyze air sensor network data in order to evaluate sensor performance and local air quality conditions.</p> <p>Sensors in Beloit showed similar trends and values to the regulatory monitor and additional sensors located in nearby Rockford, IL. Annual mean concentrations from the sensors for 2024 in Beloit were near, or well below, levels measured at the regulatory monitoring site in Rockford, IL. All 2024 data from the sensors and monitors in both Rockford and Beloit were about 1.5 ug/m3 or more below EPA's PM<sub>2.5</sub> NAAQS of 9 ug/m3.</p>
12	Nathan Dombeck	6/3/2025	<p>Email comment:</p> <p>Dear Monitor Section Manager Wolf, I live just north of Beloit in Janesville and am greatly affected by air quality in the region. I work in the healthcare space and clearly see the impact of our degrading air quality on rates of pulmonary infections. Healthy air is a human right, please find more monitoring. I am writing in response to the proposed WI DNR Air Monitoring Network Plan and to respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin. Specifically, I ask the Department of Natural Resources to install a regulatory-grade PM2.5 monitor in a location that accurately and comprehensively captures emissions from Beloit's major stationary sources—particularly fossil fuel-based utility operations. As you are aware, PM2.5 (fine particulate matter) poses significant risks to public health, especially for</p>	<p>Comments from Midwest Environmental Advocates also reference the Lake Michigan Air Directors Consortium (LADCO) 5-Year Monitoring Network Assessment finding that the Devil's Lake particulate monitor meets the EPA criteria for shutdown and should therefore be relocated to Beloit. The Devil's Lake site has functioned as a regional scale general background particulate monitor measuring both PM<sub>2.5</sub> and PM<sub>10</sub> since 1995. The Devil's Lake particulate monitor serves as an early warning indicator for wildfire smoke events impacting the South-central region of Wisconsin and recorded the highest PM<sub>10</sub> levels in the state during the Canadian wildfire smoke events of 2023. Data from this monitor is routinely used to issue critical air quality advisories supporting public health and welfare in this region of the state. Relocating a particulate monitor that measures both PM<sub>10</sub> and PM<sub>2.5</sub> from Devil's Lake to Beloit would be a complex and resource intensive process during a time of significant uncertainty surrounding the future of the federal grants that fund this monitor.</p>

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			<p>Natural Resources to install a regulatory-grade PM2.5 monitor in a location that accurately and comprehensively captures emissions from Beloit’s major stationary sources—particularly fossil fuel-based utility operations.</p> <p>As you are aware, PM2.5 (fine particulate matter) poses significant risks to public health, especially for vulnerable populations such as children, the elderly, and those with existing respiratory or cardiovascular conditions. Despite this, there is currently a lack of sufficient regulatory monitoring in areas downwind of large polluters where exposure may be most acute and consistent. Without this level of monitoring, the true air quality burden on Beloit residents—particularly those living in frontline and fenceline communities—will continue to be underestimated or overlooked entirely. We believe this step is not only necessary but urgent. In an era of rising environmental awareness, public health accountability, and climate urgency, the infrastructure we build today will shape our region’s future resilience. A well-placed PM2.5 regulatory monitor would demonstrate the DNR’s commitment to science-based policy, environmental justice, and proactive community protection.</p>	<p>Additionally, the air emissions inventory and compliance inspections are compliance tools that the DNR and the EPA use to determine air pollution control permit requirements are being met. If requirements are not met, the DNR or the EPA may pursue enforcement.</p> <p>Some commenters referenced greenhouse gases (GHGs) and the impacts of climate change. The DNR Air Management Program works with the EPA to understand and implement federal rules regulating GHG emissions. In addition, the program received funding through the EPA’s Climate Pollution Reduction Grant and the Wisconsin Department of Administration’s Office of Sustainability and Clean Energy (OSCE) to complete a comprehensive GHG emissions inventory. In March 2025, the program released the statewide GHG emissions inventory for 1990 through 2021 (<a href="#">Wisconsin-Greenhouse-Gas-Emissions-Inventory-Report-1990-2021.pdf</a>). This inventory includes estimates for all major GHGs and economic sectors.</p> <p>One comment referenced the IQAir 2023 World Air Quality Report. IQAir is a Swiss company specializing in air quality technology including air purifiers, air filters, air quality sensors and data platforms. The <a href="#">2023 World Air Quality Report.pdf (iqair.com)</a> authored and issued by IQAir provides an analysis of global air quality based on a combination of quality controlled regulatory data and uncontrolled nonregulatory sensor data. The limitations of comparing uncontrolled sensor data to regulatory data are well understood. Additionally, IQAir used an unpublished proprietary algorithm for data validation and interpretation of sensor data, preventing the results of the report from being replicated. The report also uses a methodology for defining specific areas called “settlements.” determined by local population distributions and administrative divisions, that is inconsistent with EPA’s methodology which defines areas based on metropolitan statistical areas (MSAs) or core based statistical areas (CBSAs). IQAir’s administrative approach therefore can lead to inconsistencies in how cities are assessed relative to air quality.</p>

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13	Yesenia Martin	6/3/2025	<p>Email comment:</p> <p>Dear Monitor Section Manager Wolf, We definitely need more air monitoring happening in Beloit, these past few months I have been sick with a sinus infection that I cannot shake due to these air conditions. It is super frustrating when you guys are supposed to be the ones helping us, but will continue to pollute our air like it doesn't affect anybody's life. I am writing in response to the proposed WI DNR Air Monitoring Network Plan and to respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin. Specifically, I ask the Department of Natural Resources to install a regulatory-grade PM2.5 monitor in a location that accurately and comprehensively captures emissions from Beloit's major stationary sources—particularly fossil fuel-based utility operations. As you are aware, PM2.5 (fine particulate matter) poses significant risks to public health, especially for vulnerable populations such as children, the elderly, and those with existing respiratory or cardiovascular conditions. Despite this, there is currently a lack of sufficient regulatory monitoring in areas downwind of large polluters where exposure may be most acute and consistent. Without this level of monitoring, the true air quality burden on Beloit residents—particularly those living in frontline and fence-line communities—will continue to be underestimated or overlooked entirely. We believe this step is not only necessary but urgent. In an era of rising environmental awareness, public health accountability,</p>	<p>The 2023 IQAir report also relies on 2023 data, which includes data from when the region was heavily impacted by the 2023 Canadian wildfire smoke events.</p> <p><b>Response to Comments #10-48</b></p>

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			and climate urgency, the infrastructure we build today will shape our region's future resilience. A well-placed PM2.5 regulatory monitor would demonstrate the DNR's commitment to science-based policy, environmental justice, and proactive community protection. Thank you for your time, your service, and your consideration of this important request.	
14	Pamela Guthman	6/3/2025	<p>Email comment #1:</p> <p>Dear Monitor Section Manager Wolf, I am a public and population health nurse, with 40 years of expertise in caring for people across the life span and in various settings. I like to examine data and review research to inform my nursing and public health interventions to improve the health of people. This includes knowing what the levels of air pollution there is in the air for the patients of whom I am responsible to. I am writing in response to the proposed WI DNR Air Monitoring Network Plan and to respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin. Specifically, I ask the Department of Natural Resources to install a regulatory-grade PM2.5 monitor in a location that accurately and comprehensively captures emissions from Beloit's major stationary sources—particularly fossil fuel-based utility operations. As you are aware, PM2.5 (fine particulate matter) poses significant risks to public health, especially for vulnerable populations such as children, the elderly, and those with existing respiratory or cardiovascular conditions. Despite this,</p>	

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			<p>there is currently a lack of sufficient regulatory monitoring in areas downwind of large polluters where exposure may be most acute and consistent. Without this level of monitoring, the true air quality burden on Beloit residents—particularly those living in frontline and fenceline communities—will continue to be underestimated or overlooked entirely. We believe this step is not only necessary but urgent. In an era of rising environmental awareness, public health accountability, and climate urgency, the infrastructure we build today will shape our region’s future resilience. A well-placed PM2.5 regulatory monitor would demonstrate the DNR’s commitment to science-based policy, environmental justice, and proactive community protection. Thank you for your time, your service, and your consideration of this important request.</p> <p>Email comment #2:  Dear Monitor Section Manager Wolf,  I am a public and population health nurse, with advanced education and training as a doctoral-prepared nurse who understands the importance of data to drive important decision making. I am concerned about the air quality and the negative health effects to people when we are not addressing air pollution data needs for especially our children. Do you know how challenging it is as a nurse to try to console a mom, a dad, grandparent, when their child or grandchild is gasping for air. Please hold this thought in your mind as in doing the right thing to address air pollution in our state of Wisconsin.</p>	



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			<p>So, this concern regarding air pollution, has brought me to writing in response to the proposed WI DNR Air Monitoring Network Plan and to respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin. Specifically, I ask the Department of Natural Resources to install a regulatory-grade PM2.5 monitor in a location that accurately and comprehensively captures emissions from Beloit's major stationary sources—particularly fossil fuel-based utility operations</p> <p>As you are aware, PM2.5 (fine particulate matter) poses significant risks to public health, especially for vulnerable populations such as children, the elderly, and those with existing respiratory or cardiovascular conditions. Despite this, there is currently a lack of sufficient regulatory monitoring in areas downwind of large polluters where exposure may be most acute and consistent. Without this level of monitoring, the true air quality burden on Beloit residents—particularly those living in frontline and fenceline communities—will continue to be underestimated or overlooked entirely. We believe this step is not only necessary but urgent. In an era of rising environmental awareness, public health accountability, and climate urgency, the infrastructure we build today will shape our region's future resilience. A well-placed PM2.5 regulatory monitor would demonstrate the DNR's commitment to science-based policy, environmental justice, and proactive community protection.</p>	

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			Thank you for your time, your service, and your consideration of this important request.	
15	Jasmine Hartke	6/3/2025	<p>Email comment:</p> <p>Dear Monitor Section Manager</p> <p>Wolf, PLEASE PUT THE PEOPLE FIRST. As a healthcare professional living in Beloit, WI, I am writing in response to the proposed WI DNR Air Monitoring Network Plan. I respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin. Specifically, I ask the Department of Natural Resources to install a regulatory-grade PM2.5 monitor in a location that accurately and comprehensively captures emissions from Beloit's major stationary sources—particularly fossil fuel-based utility operations. As you are aware, PM2.5 (fine particulate matter) poses significant risks to public health, especially for vulnerable populations such as children, the elderly, and those with existing respiratory or cardiovascular conditions. Despite this, there is currently a lack of sufficient regulatory monitoring in areas downwind of large polluters where exposure may be most acute, leading to long lasting, life altering issues. Without this level of monitoring, the true air quality burden on Beloit residents—particularly those living in frontline and fence-line communities—will continue to be underestimated or overlooked entirely. We believe this step is not only necessary but urgent. In an era of rising environmental awareness, public health accountability, and climate urgency, the infrastructure we build today will shape</p>	

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16	Yusuf Adama	6/3/2025	<p>Email comment:</p> <p>Dear Monitor Section Manager Wolf, I live in Beloit. I see so many people with asthma and vulnerable populations like children, the elderly, pregnant people, and those suffering from other health conditions. We absolutely need better air monitoring throughout Wisconsin. I am writing in response to the proposed WI DNR Air Monitoring Network Plan and to respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin. Specifically, I ask the Department of Natural Resources to install a regulatory-grade PM2.5 monitor in a location that accurately and comprehensively captures emissions from Beloit's major stationary sources—particularly fossil fuel-based utility operations. As you are aware, PM2.5 (fine particulate matter) poses significant risks to public health, especially for vulnerable populations such as children, the elderly, and those with existing respiratory or cardiovascular conditions. Despite this, there is currently a lack of sufficient regulatory monitoring in areas downwind of large polluters where exposure may be most acute and consistent. Without this level of monitoring, the true air quality burden on Beloit residents—particularly</p>	

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17	Alex Kalfayan	6/3/2025	<p>Email comment:</p> <p>Dear Monitor Section Manager Wolf, I live in Madison, with some of the cleanest air of a midsized city in the U.S.. Beloit supplies our power with dirty fuel sources because your agency approves costly gas plants that cause health harms to all of our communities. You should at least have the decency to monitor what you are doing to that community’s air after, especially after ignoring your statutory obligations and approving those gas plants. It wouldn’t make up for that, but getting a baseline is necessary to mitigate/ reduce the real harms your agency is causing. I would like to take fewer calls from people suffering from asthma and dealing with strokes and if they are lucky, the aftermath. But since you ignore the known health harms from these plants, just like Zeldin, you could at least make public health mitigation easier by expanding air monitoring. I am writing in response to the proposed WI DNR Air Monitoring Network Plan and to</p>	

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			<p>respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin. Specifically, I ask the Department of Natural Resources to install a regulatory-grade PM2.5 monitor in a location that accurately and comprehensively captures emissions from Beloit's major stationary sources—particularly fossil fuel-based utility operations. As you are aware, PM2.5 (fine particulate matter) poses significant risks to public health, especially for vulnerable populations such as children, the elderly, and those with existing respiratory or cardiovascular conditions. Despite this, there is currently a lack of sufficient regulatory monitoring in areas downwind of large polluters where exposure may be most acute and consistent. Without this level of monitoring, the true air quality burden on Beloit residents—particularly those living in frontline and fenceline communities—will continue to be underestimated or overlooked entirely. We believe this step is not only necessary but urgent. In an era of rising environmental awareness, public health accountability, and climate urgency, the infrastructure we build today will shape our region's future resilience. A well-placed PM2.5 regulatory monitor would demonstrate the DNR's commitment to science-based policy, environmental justice, and proactive community protection. Thank you for your time, your service, and your consideration of this important request.</p>	

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18	Alex Culver	6/3/2025	<p>Email comment:</p> <p>Dear Monitor Section Manager Wolf,I was born and raised in Beloit and also spent 10 years living in downtown Chicago. While summers in Chicago were unbearable for a multitude of reasons, the air was hardly ever an issue. However, since moving back to Beloit in '22 and noticing how many more people, myself included, have breathing problems, things need to change. Wisconsin was known for taking pride in its history of caring for the natural resources we have AND the people who enjoy them, both residents and visitors alike. We need to do better than what we are now and we need to do it now. It's time to listen to the community and take action to ensure we can still breathe fresh, CLEAN air or what is the whole point of living in a state full of amazing natural wonders.I am writing in response to the proposed WI DNR Air Monitoring Network Plan and to respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin. Specifically, I ask the Department of Natural Resources to install a regulatory-grade PM2.5 monitor in a location that accurately and comprehensively captures emissions from Beloit's major stationary sources— particularly fossil fuel-based utility operations.As you are aware, PM2.5 (fine particulate matter) poses significant risks to public health, especially for vulnerable populations such as children, the elderly, and those with existing respiratory or cardiovascular conditions. Despite this, there is currently a lack of sufficient regulatory monitoring in areas downwind</p>	

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19	Elizabeth White	6/5/2025	<p>Emailed comment:</p> <p>Dear Monitor Section Manager Wolf, As a long time Rock county native I suffer from asthma as do my two young children. I remember the fear of wondering if my child was going to respond to her life saving albuterol inhaler treatment the first time she showed signs of the chronic lung disease. I recall the day and context, attending an outdoor music festival, at a time when because of climate changes that layered the burden of air quality with increased seasonal allergens circulating in the air, with the increased warmth in the air for a mid fall festival, leading to increased air pollutants that were not visible or detected by odor. These layered circumstances I believe without a doubt increased the chances of my daughter's asthma attack that day, the first day she</p>	

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			<p>ever showed symptoms. Asthma and lung diseases including cancers are the most visible health effects from the increased pollution poisoning our air. I want for my children and their children to continue to enjoy outdoor open air events, it is our State's beloved pastime and location for the majority of our economic system (outdoor workers). Without data for times when outdoor time should be limited, or personal protective equipment worn, we will continue to see preventable harm escalate and lives will be lost. I urge you to act, in the absence of our fully funded and staffed EPA at the federal level, we are relying on you, as our State agency that cares for, manages, and has jurisdiction over monitoring our air quality. All communities deserve to understand their risk, in order to protect themselves, their workforce, and their neighbors. Please support our wellbeing in Rock County, our neighbors in Racine County, and Superior County, in addition to minimal expansion of air quality monitoring to extend to each county in our state. We are counting on the DNR's integrity and loyalty to the community members that you serve. As a medical physician serving communities, my ability to help my patient's relies on reliable data, and this is in your hands. Please reach out to me as a resource at anytime to further understand this public health crisis and how you can help. I am writing in response to the proposed WI DNR Air Monitoring Network Plan and to respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin.</p>	



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20	Linda Slatter	6/5/2025	<p>Emailed comment:</p> <p>Dear Monitor Section Manager Wolf,As a person with asthma air quality is extremely important to me.I am writing in response to the proposed WI DNR Air Monitoring Network Plan and to respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin. Specifically, I ask the Department of Natural Resources to install a regulatory-grade PM2.5 monitor in a location that accurately and comprehensively captures emissions from Beloit’s major stationary sources—particularly fossil fuel-based utility operations.As you are aware, PM2.5 (fine particulate matter) poses significant risks to public health, especially for vulnerable populations such as children, the elderly, and those with existing respiratory or cardiovascular conditions. Despite this, there is currently a lack of sufficient regulatory monitoring in areas downwind of large polluters where exposure may be most acute and consistent. Without this level of monitoring, the true air quality burden on Beloit residents—particularly those living in frontline and fenceline communities—will continue to be underestimated or overlooked entirely.We believe this step is not only necessary but urgent. In an era of rising environmental awareness, public health accountability, and climate urgency, the infrastructure we build today will shape our region’s future resilience. A well-placed PM2.5 regulatory monitor would demonstrate the DNR’s commitment to science-based policy, environmental justice, and proactive community</p>	

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			protection.Thank you for your time, your service, and your consideration of this important request.	
21	Theron Seitz	6/5/2025	<p>Emailed comment:</p> <p>Dear Monitor Section Manager Wolf,Clean, breathable air is critical for everyone and everything. As a nurse, I know that high levels of particulate matter in the air leads to asthmas exacerbations. These asthma exacerbations strain the healthcare system, cost huge sums of money, and most importantly, reduce the quality of life for people in my town.I am writing in response to the proposed WI DNR Air Monitoring Network Plan and to respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin. Specifically, I ask the Department of Natural Resources to install a regulatory-grade PM2.5 monitor in a location that accurately and comprehensively captures emissions from Beloit’s major stationary sources—particularly fossil fuel-based utility operations.As you are aware, PM2.5 (fine particulate matter) poses significant risks to public health, especially for vulnerable populations such as children, the elderly, and those with existing respiratory or cardiovascular conditions. Despite this, there is currently a lack of sufficient regulatory monitoring in areas downwind of large polluters where</p>	

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22	Brandi Martinez	6/5/2025	<p>Emailed comment:  Dear Monitor Section Manager Wolf, I live in Janesville and have already suffered from air quality issues as an asthmatic. Not only should we work to plant trees that will reduce pollen levels, but we should also monitor the air to keep community safe from predatory corporations. I want to live in a world where we can easily hold appropriate entities accountable for any pollution they fail to prevent. Instead of taxing or fining for pollution, we should have the right to socialize their business for the people, if they damage and impact our community air quality. I am writing in response to the proposed WI DNR Air Monitoring Network Plan and to respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin. Specifically, I ask</p>	

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			<p>the Department of Natural Resources to install a regulatory-grade PM2.5 monitor in a location that accurately and comprehensively captures emissions from Beloit’s major stationary sources—particularly fossil fuel-based utility operations. As you are aware, PM2.5 (fine particulate matter) poses significant risks to public health, especially for vulnerable populations such as children, the elderly, and those with existing respiratory or cardiovascular conditions. Despite this, there is currently a lack of sufficient regulatory monitoring in areas downwind of large polluters where exposure may be most acute and consistent. Without this level of monitoring, the true air quality burden on Beloit residents—particularly those living in frontline and fenceline communities—will continue to be underestimated or overlooked entirely. We believe this step is not only necessary but urgent. In an era of rising environmental awareness, public health accountability, and climate urgency, the infrastructure we build today will shape our region’s future resilience. A well-placed PM2.5 regulatory monitor would demonstrate the DNR’s commitment to science-based policy, environmental justice, and proactive community protection. Thank you for your time, your service, and your consideration of this important request.</p>	
23	Bruce Krawisz	6/7/2025	<p>Email comment: I am writing in response to the proposed WI DNR Air Monitoring Network Plan and to respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin.</p>	

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24	Christine Nelson	6/10/2025	<p>Email comment:</p> <p>Dear Benjamin Wolf,</p> <p>Please install a regulatory PM2.5 monitor in the Beloit area as the DNR develops its air monitoring network plan. Our community is experiencing emissions from public utilities that provide power beyond our local area. While bearing the brunt of the pollution, we need regulatory level monitoring to show the impact here. Community scientists, air science laboratories, and industry experts have conducted independent work demonstrating that the levels of industrial-related PM in our area could violate federal air quality standards. We need the DNR to fulfill its mission and examine potential environmental and health harms in the Beloit area by collecting regulatory standard PM2.5 data here.</p>	
25	Dylan Dietzman	6/10/2025	<p>Email comment:</p> <p>I don't currently live in Beloit, but I have family and friends that do, and I still care about that community and the health of those within.</p> <p>I am writing in response to the proposed WI DNR Air Monitoring Network Plan and to respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin. Specifically, I ask the Department of Natural Resources to install a regulatory-grade PM2.5 monitor in a location that accurately and comprehensively captures emissions from Beloit's major stationary sources—particularly fossil fuel-based utility operations.</p> <p>As you are aware, PM2.5 (fine particulate matter) poses significant risks to public</p>	

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26	Gloria Randall-Hewitt	6/10/2025	<p>Email comment:</p> <p>We all know that we can't improve what we don't measure. We all know the benefits of clean air and the health hazards of dirty air.</p> <p>I'm writing to ask the DNR to increase the monitoring of our air in my part of the state, Racine County, and other parts of the state that need air quality improvements. Monitoring the air quality is an essential step in improving our air, and our health.</p>	



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			<p>Additionally, having a healthy climate is an important part of building a good economic climate for our state. Tourism and our natural resources such as the parks and lakes of the state are an important contribution to jobs and tax dollars and the overall economic health of Wisconsin. We need to protect our people, our climate and our economy by having the cleanest environment possible - for us all.</p> <p>I am writing in response to the proposed WI DNR Air Monitoring Network Plan and to respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin. Specifically, I ask the Department of Natural Resources to install a regulatory-grade PM2.5 monitor in a location that accurately and comprehensively captures emissions from Beloit's major stationary sources—particularly fossil fuel-based utility operations.</p> <p>As you are aware, PM2.5 (fine particulate matter) poses significant risks to public health, especially for vulnerable populations such as children, the elderly, and those with existing respiratory or cardiovascular conditions. Despite this, there is currently a lack of sufficient regulatory monitoring in areas downwind of large polluters where exposure may be most acute and consistent. Without this level of monitoring, the true air quality burden on Beloit residents—particularly those living in frontline and fenceline communities—will continue to be underestimated or overlooked entirely. We believe this step is not only necessary but urgent. In an era of rising</p>	

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27	Kathy Allen	6/10/2025	<p>Email comment:</p> <p>I am writing in response to the proposed WI DNR Air Monitoring Network Plan and to request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin. Specifically, I ask the DNR to install a regulatory-grade PM2.5 monitor in a location that accurately and comprehensively captures emissions from Beloit's major stationary sources—particularly fossil fuel-based utility operations.</p> <p>As you know, PM2.5 poses significant risks to public health, especially for vulnerable populations. Despite this, there is currently a lack of sufficient regulatory monitoring in areas downwind of large polluters where exposure may be most acute and consistent. Without this level of monitoring, the true air quality burden on Beloit residents— particularly those living in frontline communities —will continue to be underestimated or overlooked entirely. I believe this step is not only necessary but urgent. In an era of rising environmental awareness, public health accountability, and climate urgency, the infrastructure we</p>	

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			<p>build today will shape our region's future resilience. A well-placed PM2.5 regulatory monitor would demonstrate the DNR's commitment to science-based policy, environmental justice, and proactive community protection.</p> <p>Thank you for your time and your consideration of this important request.</p>	
28	Joan Schiller	6/10/2025	<p>Email comment:</p> <p>Air pollution causes lung cancer. I am writing to ask the Department of Natural Resources to install a regulatory-grade PM2.5 monitor in a location that accurately and comprehensively captures emissions from Beloit's major stationary sources—particularly fossil fuel-based utility operations, so that we can accurately assess the levels of PM2.5 in the area. Currently there is a lack of sufficient regulatory monitoring in areas downwind of large polluters where exposure may be most acute and consistent, such as Beloit. Thank you for your time, your service, and your consideration of this important request.</p>	

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29	Patrick Stoffel	6/10/2025	<p>Email comment:</p> <p>I created a decision matrix (yes, with the help of AI) comparing natural gas power plants with solar and wind (renewable). It compared costs over time (construction, maintenance, fuel, carbon emissions, etc), economic development and job creation, and impacts from federal and state policies. I used sources including: the US Energy Information Administration, the National Renewable Energy Laboratory, the Lawrence Berkeley National Laboratory, the Wisconsin PSC, the Rocky Mountain Institute, the UW-Madison Energy Institute, the Great Plains Institute, and the Environmental Protection Agency. The AI (chatGPT) was used only as an organization and information locator tool and not as a source of any information provided in the matrix. The results of this analysis clearly shows the benefits and advantages of going with renewable power sources rather than methane / natural gas. I really didn't need to do this - its common sense. I also installed a heat pump system to replace both my AC and furnace (which both broke down due to age) using the IRA funds. I felt it was my duty as a citizen to do this. Our collective futures are at stake.</p> <p>I am writing in response to the proposed WI DNR Air Monitoring Network Plan and to respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin. Specifically, I ask the Department of Natural Resources to install a regulatory-grade PM2.5 monitor in a location that accurately and comprehensively captures emissions from Beloit's major stationary</p>	

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			<p>sources—particularly fossil fuel-based utility operations.</p> <p>As you are aware, PM2.5 (fine particulate matter) poses significant risks to public health, especially for vulnerable populations such as children, the elderly, and those with existing respiratory or cardiovascular conditions. Despite this, there is currently a lack of sufficient regulatory monitoring in areas downwind of large polluters where exposure may be most acute and consistent. Without this level of monitoring, the true air quality burden on Beloit residents—particularly those living in frontline and fenceline communities—will continue to be underestimated or overlooked entirely. We believe this step is not only necessary but urgent. In an era of rising environmental awareness, public health accountability, and climate urgency, the infrastructure we build today will shape our region’s future resilience. A well-placed PM2.5 regulatory monitor would demonstrate the DNR’s commitment to science-based policy, environmental justice, and proactive community protection.</p> <p>Thank you for your time, your service, and your consideration of this important request.</p>	

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30	Susan Gillespie	6/10/2025	<p>Email comment:</p> <p>Dear Monitor Section Manager Wolf,</p> <p>I am writing in response to the proposed WI DNR Air Monitoring Network Plan and to respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin. Specifically, I ask the Department of Natural Resources to install a regulatory-grade PM2.5 monitor in a location that accurately and comprehensively captures emissions from Beloit's major stationary sources—particularly fossil fuel-based utility operations.</p> <p>As you are aware, PM2.5 (fine particulate matter) poses significant risks to public health, especially for vulnerable populations such as children, the elderly, and those with existing respiratory or cardiovascular conditions. Despite this, there is currently a lack of sufficient regulatory monitoring in areas downwind of large polluters where exposure may be most acute and consistent. Without this level of monitoring, the true air quality burden on Beloit residents—particularly those living in frontline and fenceline communities—will continue to be underestimated or overlooked entirely. We believe this step is not only necessary but urgent. In an era of rising environmental awareness, public health accountability, and climate urgency, the infrastructure we build today will shape our region's future resilience. A well-placed PM2.5 regulatory monitor would demonstrate the DNR's commitment to science-based policy, environmental justice, and proactive community</p>	

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31	Nancy Kriofsky	6/10/2025	<p>Email comment: Dear Monitor Section Manager Wolf, I am writing in response to the proposed WI DNR Air Monitoring Network Plan and to respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin. Specifically, I ask the Department of Natural Resources to install a regulatory-grade PM2.5 monitor in a location that accurately and comprehensively captures emissions from Beloit's major stationary sources—particularly fossil fuel-based utility operations.</p> <p>As you are aware, PM2.5 (fine particulate matter) poses significant risks to public health, especially for vulnerable populations such as children, the elderly, and those with existing respiratory or cardiovascular conditions. Despite this, there is currently a lack of sufficient regulatory monitoring in areas downwind of large polluters where exposure may be most acute and consistent. Without this level of monitoring, the true air quality burden on Beloit residents—particularly those living in frontline and fenceline communities—will continue to be</p>	

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			<p>underestimated or overlooked entirely. We believe this step is not only necessary but urgent. In an era of rising environmental awareness, public health accountability, and climate urgency, the infrastructure we build today will shape our region's future resilience. A well-placed PM2.5 regulatory monitor would demonstrate the DNR's commitment to science-based policy, environmental justice, and proactive community protection.</p> <p>Thank you for your time, your service, and your consideration of this important request.</p>	
32	Cristina Carvajal	6/11/2025	<p>Email comment: Dear Monitor Section Manager Wolf, Rock County need a regulatory PM2.5 Monitor</p> <p>Thank you for your time, service, and consideration of this important request. A regulatory-grade PM2.5 monitor is urgently needed in Southcentral Wisconsin to accurately capture emissions from Beloit's major stationary sources, notably fossil fuel-based utility operations. This request responds to the proposed WI DNR Air Monitoring Network Plan, aiming to enhance air quality infrastructure. Current regulatory monitoring fails to sufficiently cover areas downwind of large polluters, where exposure is highest. This gap leads to an underestimation or complete oversight of the actual air quality burden on Beloit and Rock County residents. The residents in this area are showing the health impact of air pollution and we need scientific data to evaluate the current exposure to pollution.</p>	



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			Your time, service, and consideration of this critical request are greatly appreciated.	
33	Gregg Schnieder	6/11/2025	<p>Verbal comment:</p> <p>I'm responding to the monitoring network plan and requesting that a regulatory grade PM2.5 monitor be installed in Beloit. Some facts that are there using just EPA data from 2023, Rock county self reported pollution levels of over 3.1 million metric tons of greenhouse gas emissions, 91% of that came from stationary power plants. A year earlier looking at just Beloit and the town of Beloit the same self reporting pollution, the power plants here are 96% of the 2.4 million metric tons emitted in 2022. Now if use the 2024 carbon cap and trade cost that says that the emission cost for Beloit is a little over 53 million dollars. Even the EPA environmental justice listed Beloit as a burden indicator at the 95<sup>th</sup> to 100 percentile. So it's very clear that Beloit has become a pollution dump or a pollution haven in Wisconsin specifically with Aliant Energy who has now requested to double the size of their plants and so this is going to be an extreme cost to Beloit and to health of the people who live here. Also as it was mentioned before, it's interesting that all the counties in Wisconsin with NAACP chapters, the all have failing air quality grades. So again it's an area where environmental justice needs to be addressed in this area as we look at the pollution levels here and we all know that PM2.5 poses significant risks to public health especially those with vulnerable</p>	

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			<p>populations like children, elderly and those with existing Cardiovasc conditions. It's really critical that we need to do this. Using the US census data, Rock county has the 2<sup>nd</sup>, 3<sup>rd</sup>, 4<sup>th</sup>, 6<sup>th</sup> and 9<sup>th</sup> most vulnerable census tracks of the state of Wisconsin's which then puts Beloit as 2<sup>nd</sup> out of the 1,400 census tracks and the self reporting greenhouse gases emission have gone up 300% since 2017. So Beloit has the 5<sup>th</sup> highest asthma hospitalization rate in the state and COPD 47.6 hospital visits per 10,000. So the air quality in this area is having a devastating impact on the health of the residents in the area. The DNR doesn't have a monitor here. All the Purple Air sensors we have in the area say that the air is not safe to breathe and is only getting worse. It doesn't matter if we are looking at the smoke from the forest fires, this is all year round that we are heavily polluted in this area. I believe placing a regulatory air monitor in Beloit is not only necessary but it's really urgent and it needs to be in place before Aliant is allowed to do any expansion or any work at all. In the year of rising environmental awareness and public health accountability and climate urgency. The urgency we build today is going to shape our region's future resilience. A well placed 2.5 regulatory monitor is critical for Beloit and the health of those of Rock county.</p>	

Comment #	Name of Commentor	Date of Comment	Comment	Response
34	Ian Kersten	6/11/2025	<p>Email comment:</p> <p>Dear Monitor Section Manager Wolf,</p> <p>We need more comprehensive monitoring in place. As someone who is married to a person with asthma, the air quality makes a big impact on our life.</p> <p>I am writing in response to the proposed WI DNR Air Monitoring Network Plan and to respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin. Specifically, I ask the Department of Natural Resources to install a regulatory-grade PM2.5 monitor in a location that accurately and comprehensively captures emissions from Beloit's major stationary sources—particularly fossil fuel-based utility operations.</p> <p>As you are aware, PM2.5 (fine particulate matter) poses significant risks to public health, especially for vulnerable populations such as children, the elderly, and those with existing respiratory or cardiovascular conditions. Despite this, there is currently a lack of sufficient regulatory monitoring in areas downwind of large polluters where exposure may be most acute and consistent. Without this level of monitoring, the true air quality burden on Beloit residents—particularly those living in frontline and fenceline communities—will continue to be underestimated or overlooked entirely.</p> <p>We believe this step is not only necessary but urgent. In an era of rising environmental awareness, public health accountability, and climate urgency, the infrastructure we build today will shape our region's future resilience. A well-placed</p>	

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			<p>PM2.5 regulatory monitor would demonstrate the DNR's commitment to science-based policy, environmental justice, and proactive community protection.</p> <p>Thank you for your time, your service, and your consideration of this important request.</p>	
35	Nathan Nathan	6/11/2025	<p>Email comment:</p> <p>Dear Monitor Section Manager Wolf,</p> <p>To whom it may concern - I am a healthcare provider in southern WI. My area of expertise is infectious diseases, and I can say confidently that air quality has a massive impact on the prevalence of infectious diseases. Worse air quality impairs our patient's airways, paralyzes cells responsible for sweeping pathogens out of the airways, and predisposes to bacterial or viral respiratory infections and pneumonias. These may not sound like a big deal, but pneumonia is the top infectious killer in the US, and any attempts we can make to improve our air quality will improve quality of life for many frail people, including those with autoimmune diseases, cancer, and the elderly.</p> <p>I am writing in response to the proposed WI DNR Air Monitoring Network Plan and to respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin. Specifically, I ask the Department of Natural Resources to install a regulatory-grade PM2.5 monitor in a location that</p>	

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			<p>accurately and comprehensively captures emissions from Beloit’s major stationary sources—particularly fossil fuel-based utility operations.</p> <p>As you are aware, PM2.5 (fine particulate matter) poses significant risks to public health, especially for vulnerable populations such as children, the elderly, and those with existing respiratory or cardiovascular conditions. Despite this, there is currently a lack of sufficient regulatory monitoring in areas downwind of large polluters where exposure may be most acute and consistent. Without this level of monitoring, the true air quality burden on Beloit residents—particularly those living in frontline and fenceline communities—will continue to be underestimated or overlooked entirely. We believe this step is not only necessary but urgent. In an era of rising environmental awareness, public health accountability, and climate urgency, the infrastructure we build today will shape our region’s future resilience. A well-placed PM2.5 regulatory monitor would demonstrate the DNR’s commitment to science-based policy, environmental justice, and proactive community protection.</p> <p>Thank you for your time, your service, and your consideration of this important request.</p>	

Comment #	Name of Commentor	Date of Comment	Comment	Response
36	John Meurer	6/11/2025	<p>Email comment:</p> <p>Dear Monitor Section Manager Wolf,</p> <p>I am a Professor Emeritus of General Pediatrics and Community Health at the Medical College of Wisconsin, where I served on faculty for 30 years. I have a long-standing commitment to public health, environmental conservation, and air quality. I previously led Fight Asthma Milwaukee Allies as Coalition Director and Principal Investigator for over a decade, partnering with community, health, and environmental stakeholders to address the adverse health effects of air pollution on children and families.</p> <p>I am writing in response to the draft 2026 Wisconsin Air Monitoring Network Plan to respectfully urge the Wisconsin DNR to expand regulatory air monitoring, specifically the installation of a regulatory-grade PM2.5 monitor in Beloit. Currently, only 40% of Wisconsin counties have regulatory air monitors, leaving critical data gaps that hinder enforcement and public protection. These gaps disproportionately impact historically industrial and overburdened communities like Beloit, which lack adequate state monitoring despite being downwind of major stationary sources, including fossil fuel-based utilities.</p> <p>In 2023, after concerned residents deployed community-level air sensors, Beloit was designated by IQAir as the most polluted smaller city in the U.S.—a stark reminder that “no monitor” does not mean “no pollution.”</p> <p>This lack of monitoring is not just a technical shortfall, it is also an</p>	

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			<p>environmental justice issue. Rock, Racine, and Douglas Counties, among others, remain under-monitored despite high emissions and poor air quality grades in the 2025 ALA State of the Air Report. In fact, Rock County, despite reporting over 3 million metric tons of CO<sub>2</sub> emissions, has no PM<sub>2.5</sub> monitor and only one ozone monitor, while Cook County, IL, has 25 monitors and lower emissions.</p> <p>We urge the DNR to address this inequity and prioritize the placement of a PM<sub>2.5</sub> monitor in Beloit in its 2026 Plan. This would be a vital step toward ensuring health protections are informed by real data and equitably enforced.</p> <p>Thank you for your service and for considering this critical request to protect the health and resilience of all Wisconsin communities.</p>	
37	Nicolas Castillo	6/11/2025	<p>Email comment:</p> <p>Dear Monitor Section Manager Wolf,</p> <p>I am writing in response to the proposed WI DNR Air Monitoring Network Plan and to respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin. Specifically, I ask the Department of Natural Resources to install a regulatory-grade PM<sub>2.5</sub> monitor in a location that accurately and comprehensively captures emissions from Beloit's major stationary sources—particularly fossil fuel-based utility operations.</p> <p>As you are aware, PM<sub>2.5</sub> (fine particulate matter) poses significant risks to public health, especially for vulnerable populations such as children, the elderly, and those with existing respiratory or</p>	

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38	Pablo Toral	6/11/2025	Email comment: Dear Monitor Section Manager Wolf, I am writing in response to the proposed WI DNR Air Monitoring Network Plan and to respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin. Specifically, I ask the Department of Natural Resources to install a regulatory-grade PM2.5 monitor in a location that accurately and comprehensively captures emissions from Beloit’s major stationary sources—particularly fossil fuel-based utility operations. As you are aware, PM2.5 (fine particulate	



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			<p>matter) poses significant risks to public health, especially for vulnerable populations such as children, the elderly, and those with existing respiratory or cardiovascular conditions. Despite this, there is currently a lack of sufficient regulatory monitoring in areas downwind of large polluters where exposure may be most acute and consistent. Without this level of monitoring, the true air quality burden on Beloit residents—particularly those living in frontline and fenceline communities—will continue to be underestimated or overlooked entirely. We believe this step is not only necessary but urgent. In an era of rising environmental awareness, public health accountability, and climate urgency, the infrastructure we build today will shape our region’s future resilience. A well-placed PM2.5 regulatory monitor would demonstrate the DNR’s commitment to science-based policy, environmental justice, and proactive community protection.</p> <p>Thank you for your time, your service, and your consideration of this important request.</p>	
39	Sarah French	6/12/2025	<p>Email comment:</p> <p>Dear Monitor Section Manager Wolf,</p> <p>I am writing in response to the proposed WI DNR Air Monitoring Network Plan and to respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin. Specifically, I ask the Department of Natural Resources to install a regulatory-grade PM2.5 monitor in a location that accurately and comprehensively captures</p>	

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			<p>emissions from Beloit’s major stationary sources—particularly fossil fuel-based utility operations.</p> <p>As you are aware, PM2.5 (fine particulate matter) poses significant risks to public health, especially for vulnerable populations such as children, the elderly, and those with existing respiratory or cardiovascular conditions. Despite this, there is currently a lack of sufficient regulatory monitoring in areas downwind of large polluters where exposure may be most acute and consistent. Without this level of monitoring, the true air quality burden on Beloit residents—particularly those living in frontline and fenceline communities—will continue to be underestimated or overlooked entirely. We believe this step is not only necessary but urgent. In an era of rising environmental awareness, public health accountability, and climate urgency, the infrastructure we build today will shape our region’s future resilience. A well-placed PM2.5 regulatory monitor would demonstrate the DNR’s commitment to science-based policy, environmental justice, and proactive community protection.</p> <p>Thank you for your time, your service, and your consideration of this important request.</p>	

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40	Dr. Brittany Keyes	6/12/2025	<p>Email comment:</p> <p>Good Afternoon. My name is Dr. Brittany Keyes. I'm a physical therapist, former city councilor, volunteer at our local elementary schools, and a mom from Beloit, Wisconsin. I am also the Clean Air Policy Manager with Healthy Climate Wisconsin, and I have the honor of serving as the convener for the Stateline Clean Air Coalition and chair for the Environmental and Climate Justice Committee for the NAACP Wisconsin State conference.</p> <p>Thank you for the opportunity to speak to the WI DNR's 2026 Air Monitoring Network Plan Draft.</p> <p>I want to start by recognizing a few things. First, the Clean Air Act has been incredibly effective, saving hundreds of thousands of lives and benefiting the US economy by saving around \$2 trillion by avoiding preventable illnesses and deaths across the country. As the EPA strengthened its air quality standards, we have seen an incremental improvement in air quality throughout Wisconsin. The Clean Air Act, associated standards, and regulatory monitoring and related efforts have helped clean our air and save lives. While these standards still need to be strengthened, these regulations and clean air standards WORK, and they are NEEDED.</p> <p>Unfortunately, the benefits of the Clean Air Act are not appreciated equally or equitably across communities. Air pollution in Wisconsin and the gaps in Wisconsin's air monitoring network appear to violate some of the basic tenets of environmental justice.</p> <p>According to the 2025 ALA state of the air</p>	

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			<p>report, all Wisconsin Counties home to NAACP branches had failing air. When comparing these counties to other pollution-burdened counties in EPA Region 5, Wisconsin's air monitoring network has numerous concerning gaps, especially given the large, stationary pollution sources we have throughout our state. These undermonitored, historically industrial and pollution-burdened, communities include, but are not limited to: Milwaukee County, Racine County, Rock County, Douglas County, and Sheboygan County.</p> <p>In Rock County, the biggest reporting industrial polluter is Alliant Energy's (WPL) methane gas plant, Riverside Energy Center, which reports over 1,000,000 metric tons more CO2/GHGs than all 24 reporting industrial polluters in Cook County, IL. Despite outpacing Cook County for industrial air pollution, Rock County has zero regulatory PM2.5 monitors, and Cook County has 12 regulatory PM2.5 monitors. Milwaukee County's leading industrial polluter, We Energies (WEC), reports almost 5x more CO2/GHGs pollution than all of Chicagoland's reporting industry, but Milwaukee County only has 2 PM2.5 monitors compared to Cook County's 12. Racine County is heavily impacted by these large, stationary sources, given the proximity of its dense population centers to these coal plants, and thus, experiences the negative health impacts, but they have zero PM2.5 monitors. Finally, Sheboygan County's largest polluter, Alliant Energy's (WPL) Edgewater Coal plant, reports 1/2 million more CO2/GHGs than Chicagoland</p>	

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			<p>and ranks in the ALA's 25 worst US cities for ozone pollution, and yet, Sheboygan County has zero regulatory PM2.5 monitors. Again, the gaps in Wisconsin's air monitoring network plan result in significant environmental injustices within EPA's Region 5 (see attached).</p> <p>In 2021, when serving as Vice President on Beloit's City Council, I became aware of the extent of the industrial air pollution problem. When I reached out to the WI DNR, we were advised to use Purple Air monitors. We ran a community air monitoring project, using sensors loaned by the EPA, and our results, which did not include data from the 2023 wildfire smoke, showed concerning trends. Unfortunately, this work was not enough for the DNR to expand its PM2.5 monitoring network to Beloit.</p> <p>We proceeded by organizing a community-based coalition, the Stateline Clean Air Coalition (SCAC). The SCAC led community education events, engaged in elected official outreach, and expanded our community air monitoring network. We partnered with an Air Science Laboratory from UW Eau Claire, and they analyzed data from our Purple Air network. Their report showed that, when comparing our purple air monitors to purple air monitors in a similarly sized city recognized by the WI DNR as having high background air pollution, Beloit had similar-to-greater pollution. This supports the hypothesis that Beloit has high background air pollution (PM2.5).</p> <p>When Alliant Energy (WPL) applied to the PSC and DNR to expand its fossil fuel</p>	

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			<p>infrastructure at its Riverside Energy Center in the Township of Beloit, the Stateline Clean Air Coalition legally intervened in the WI Public Service Commission docket. Represented by Midwest Environmental Advocates, they retained an air science expert who completed regional PM 2.5 modeling. The findings from this report showed that Rock County is very likely out of attainment for PM2.5 (report attached).</p> <p>Despite all this, the 2026 Air Monitoring Network Plan CONTINUES to leave Rock County behind, and it fails to respond to the concerns and requests to expand the network by adding a regulatory PM2.5 monitor in Rock County.</p> <p>Our children are getting sick. The asthma rates in my daughter's school are the highest in Beloit. When I read books at the elementary school for Earth Day, a little girl raised her hand and said, "Air pollution makes my asthma worse." Four other kids raised their hands in succession, stating, "I have asthma, I have asthma, I have asthma, I have asthma." Then the first little girl said, "My dad has asthma too. It's bad. He could die."</p> <p>The people harmed by air pollution in my community are not just stats. They are real people.</p> <p>Beloit, Rock County, needs a regulatory PM 2.5 monitor. We need the WI DNR and EPA to be able to regulate and ensure the benefits of the Clean Air Act are appreciated by our community.</p>	
41	Mitchell Lauersdorf	6/11/2025	Verbal comment: Beloit has multiple large scale factories like Frito Lay and other large plants and having a more conclusive	

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			analysis of pollution is necessary not only for health and safety the community but to restrict and test pollution from these plants and to reasonably make sure their staying within their boundaries and that the public can also see the effects their having on our air quality because we have multiple large scale factories and we also have multiple semis coming though regularly.	

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42	Clara Swetnam-Burland	6/12/2025	<p>Verbal comment:</p> <p>Good afternoon and thank you for the opportunity to provide testimony today on the 2026 Air Monitoring Network Plan. My name is Clara Swetnam-Burland, and I am a law clerk with Midwest Environmental Advocates. MEA is a nonprofit environmental law center which combines the power of law with the resolve of communities facing environmental injustice to secure and protect the rights of all people to healthy water, land and air. MEA also plans to submit written comments to the DNR.</p> <p>I am speaking to you today to advocate for the placement of a PM2.5 monitoring site in Beloit, Wisconsin. Residents of Beloit and the surrounding area are rightfully worried about their exposure to PM2.5 pollution, as overexposure is a well-documented risk to human health. According to the Wisconsin Department of Health Services, exposure to PM2.5 can lead to increased rates of asthma, cancer, diabetes, dementia, heart attacks, and stroke.</p> <p>Recognizing the risk posed by exposure to PM2.5 pollution, the EPA has twice lowered the maximum annual standard for PM2.5 emissions, deciding on a maximum level of 9 µg/m3 in 2024. As it stands today, it is possible that the PM2.5 levels in Beloit exceed this new maximum, and thus the health of its residents is being put at risk.</p> <p>Both the data from the nearest regulatory monitoring site, located in Rockford, Illinois, and community collected data from Beloit indicate that the PM2.5 levels are</p>	



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			<p>impermissibly high. Between 2019 and 2023, the Rockford site recorded annual PM2.5 levels of 9.6, 8.5, and 9.0 µg/m3. Two of these results are at or above the acceptable level.</p> <p>Further, given Beloit's proximity to Riverside Energy Center, a large natural gas fired power plant, PM2.5 levels in Beloit itself are likely to be even higher. The community collected data from Beloit supports this conclusion, finding that the annual PM2.5 concentration was 14.8 µg/m3 in 2023, and 10.4 in 2022. Both of these results exceed the allowable maximum. If any of these estimates are correct, it is possible Beloit has one of the highest PM2.5 levels in the state.</p> <p>Additionally, if anything, PM2.5 levels in and around Beloit are likely to increase in the upcoming years. Riverside Energy Center was recently granted preliminary permission to expand their operations. According to an analysis done by an environmental engineering firm, if the expansion happens, the ambient annual PM2.5 levels could reach 9.4 µg/m3 in Beloit proper, and 12.6 µg/m3 in nearby areas.</p> <p>Therefore, if PM2.5 levels do not exceed the national standards now, they are likely to once this expansion is complete. Thus, to best determine compliance with the national standards, the DNR must place a monitoring site in Beloit.</p> <p>Finally, Beloit deserves a PM2.5 monitor because it qualifies as an at-risk community. In the amended 2024 PM2.5 monitoring regulation, the EPA emphasized that additional monitoring stations should</p>	

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			<p>be sited in an at-risk community with poor air quality. The EPA goes on to describe how Black and Hispanic populations, as well as low-income populations, qualify as “at-risk” because they experience higher PM2.5 exposure levels and an increased risk of adverse health effects.</p> <p>Beloit has a significantly higher nonwhite and low-income population compared with Wisconsin as a whole, and thus qualifies as an at-risk community, and deserves a monitor on that account as well.</p> <p>In conclusion, Beloit community members, many of whom are members of at-risk communities, are likely being exposed to PM2.5 levels beyond the acceptable maximum stated in the NAAQS, putting their health at risk. However, without a monitoring site, they have no way of proving this fact, which prevents them from seeking to remedy the air pollution levels. As such, MEA urges the DNR to add a PM2.5 monitoring site in Beloit. Thank you.</p>	

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43	Susan Adams	6/12/2025	<p>Verbal comment:</p> <p>Thank you for taking comments on the air monitoring network plan.</p> <p>I said that I support comments by Clara Swetnam-Burland, Brittany Keyes, Christina Carvajal</p> <p>And after they spoke I also support – Gregg Schneider and Yusuf Adama. I am also supportive of Patricia Lier and Harry O-Davis about the north part of the state.</p> <p>I am advocating for a regulatory air monitor here in Beloit. Last year, I wrote as the League of Women Voters Beloit Action Chair. I am doing so again – and as a private citizen. The League has about 60 members .</p> <p>Last year about this time – Beloit had received much negative press about being the worst regional city in terms of air quality. Much of this is due to a lack of monitoring elsewhere. Our city has dismissed the report as being due to Canadian wildfires, which were ACTUALLY NOT occurring during the testing period. This year of course, we AGAIN have issues with the Canadian wildfires. But no one even seems to notice. I have talked to several people who don't even realize that our air all over this area is poor. The word is not getting out so people do NOT believe we have an issue here. You cannot necessarily smell it – so it must be OK.</p> <p>This spring I was on a call in a meeting with DNR Air quality personnel in which we were encouraged to call the DNR 800 hotline number if we smelled something and wanted to report it as a problem. She said that yes – it was a good idea to use my own Purple Air monitor to monitor</p>	

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			<p>whether it was safe for me and my husband to go work outside since we both have asthma and I have COPD. And it was OK to use this data to report to the 800 number. I have done this at least once before.</p> <p>But she said - according to the DNR --- the DNR cannot use Purple Air monitors as data to make determinations about whether to allow a gas plant to make expansions – or for a plant to come into the area. This is very concerning. The DNR needs accurate data to make any decisions of this kind. SO this is a VERY important reason for having a good monitor. Public Safety is another reason!</p> <p>It is interesting to note that the DNR listed an alert for May 30th for the whole state. We were not affected yet according to our monitors, so I was able to do some outside work. that was a blanket air alert -</p> <p>I DO appreciate that there was an alert for those days that made it to the weather services. BUT on JUNE 4 when I called the DNR 800 number because I couldn't see that there was an alert on the weather stations --and our monitors in BELOIT showed that it was much worse here than what we'd had on May 30. According to our Purple air monitors in this area PM 2.5 was over 100 and red.</p> <p>YET the DNR representative I talked to at about 9 in the morning on June 4 said that there was only a moderate issue. BUT as I found out later, your own newsletter listed June 4 as problematic for our area at that time. That is very concerning. – this leads to a lot of confusion – and our own Emergency Manager at the city CANNOT</p>	

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			<p>even issue an alert unless she has backing from a DNR or EPA source. She was able to find an alert through the EPA, but had to dig to find it. THIS IS NOT GOOD Practice. We NEED a regulatory monitor that is DNR approved here in Beloit so that DNR and the public can rely on accurate information and take appropriate action. AND we need one when companies want DNR to sign off on Air Quality so that companies like Alliant can expand. The community needs to know that it IS safe to expand. I don't think it is at ALL safe and believe you should NOT approve it. There is NO data to support it. – and plenty of other data from our Beloit study and the UW Eau Claire students to make the decision to deny it. I would argue these monitors are needed all over the state – and support that the state put more money into your budget for this purpose. This is a NEED.</p>	

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44	Hannah Sorensen	6/16/2025	<p>Email comment:</p> <p>Dear Monitor Section Manager Wolf,</p> <p>My name is Hannah Sorensen and I am a city of Milwaukee resident and public health professional. I care about air quality monitoring because air pollution is a massive health issue in many Wisconsin communities, including Milwaukee, Racine, Beloit, Superior, and others. As a public health professional, I am passionate about ensuring conditions that allow all people to be healthy. Health is not just about what people eat, how much exercise they get, or what medicines they take. In reality, much of a person's opportunity to be healthy has to do with the environments that they exist in, including the air they breathe. In order for decision makers to make informed decisions about those environments, it is essential to have the data that provides an accurate picture of those environments. For too long, communities like Beloit have unjustly shouldered the responsibility of conducting air monitoring and have faced criticism from those that do not regard their data as being accurate. This is unacceptable. The DNR needs to expand their air monitoring network to provide timely, accurate data on the air quality of communities like Beloit that consistently have poor air quality that comes with potentially deadly health consequences. I am writing in regards to the proposed WI DNR Air Monitoring Network Plan. I respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin. Specifically, I ask the Department of Natural Resources to install a regulatory-grade PM2.5 monitor in</p>	

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			<p>a location that accurately and comprehensively captures emissions from Beloit’s major stationary sources—particularly fossil fuel-based utility operations.</p> <p>As you are aware, PM2.5 (fine particulate matter) poses significant risks to public health, especially for vulnerable populations such as children, the elderly, and those with existing respiratory or cardiovascular conditions. Despite this, there is currently a lack of sufficient regulatory monitoring in areas downwind of large polluters where exposure may be most acute and consistent. Without this level of monitoring, the true air quality burden on Beloit residents—particularly those living in frontline and fenceline communities—will continue to be underestimated or overlooked entirely. This step is not only necessary but urgent. In an era of rising environmental awareness, public health accountability, and climate urgency, the infrastructure we build today will shape our region’s future resilience. A well-placed PM2.5 regulatory monitor would demonstrate the DNR’s commitment to science-based policy, environmental justice, and proactive community protection.</p> <p>Thank you for your time, your service, and your consideration of this important request.</p>	

Comment #	Name of Commentor	Date of Comment	Comment	Response
45	Marta Karlov	6/17/2025	<p>Email comment:</p> <p>Dear Monitor Section Manager Wolf,</p> <p>Physicians for Social Responsibility Wisconsin (PSR Wisconsin) and the Wisconsin Environmental Health Network (WEHN) are groups of physicians and healthcare professionals dedicated to protecting public health. As organizations deeply concerned about the impact of climate change on population health, we advocate for urgent action to safeguard our communities and future generations. As the Executive Director of PSR WI/WEHN, I am writing in response to the proposed Department of Natural Resources (DNR) Air Monitoring Network Plan and to respectfully request a critical enhancement to the air quality infrastructure in south central Wisconsin. Specifically, I ask the DNR to install a regulatory-grade PM2.5 monitor in a location that accurately and comprehensively captures emissions from Beloit's major stationary sources—particularly fossil fuel-based utility operations.</p> <p>As you are aware, PM2.5 (fine particulate matter) poses significant risks to public health, especially for vulnerable populations such as children, the elderly, and those with existing respiratory or cardiovascular conditions. Despite this, there is currently a lack of sufficient regulatory monitoring in areas downwind of large polluters where exposure may be most acute and consistent. Without this level of monitoring, the true air quality burden on Beloit residents—particularly those living in frontline and fenceline communities—will continue to be</p>	



Comment #	Name of Commentor	Date of Comment	Comment	Response
			<p>underestimated or overlooked entirely. We believe this step is not only necessary but urgent. In an era of rising environmental awareness, public health accountability, and climate urgency, the infrastructure we build today will shape our region's future resilience. A well-placed PM2.5 regulatory monitor would demonstrate the DNR's commitment to science-based policy, environmental justice, and proactive community protection.</p> <p>Thank you for your time, your service, and your consideration of this important request.</p>	
46	Laura Green	6/18/2025	<p>Email comment: Dear Monitor Section Manager Wolf, I am writing in response to the proposed WI DNR Air Monitoring Network Plan and to respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin. Specifically, I ask the Department of Natural Resources to install a regulatory-grade PM2.5 monitor in a location that accurately and comprehensively captures emissions from Beloit's major stationary sources—particularly fossil fuel-based utility operations.</p> <p>PM2.5 create significant health risks to the public. As a sufferer of long-COVID, I know firsthand the negative consequences even a small amount of PM 2.5 exposure can have on one's respiratory and cardiovascular health. With wildfire smoke becoming more common in Wisconsin, along with rollbacks of greenhouse gas standards (which regulate PM2.5-producing fossil fuels), PM2.5 pollution is</p>	

Comment #	Name of Commentor	Date of Comment	Comment	Response
			<p>becoming more common.</p> <p>Despite this, there is currently a lack of sufficient regulatory monitoring in areas downwind of large polluters where exposure may be most acute and consistent. Without data, we cannot know the air quality burden of residents in this diverse and under-resourced community. Without knowing the burden, we cannot taking meaningful action to address environmental disparities in who is exposed to harmful air pollution, and hold polluters accountable.</p> <p>A well-placed PM2.5 regulatory monitor would demonstrate the DNR's commitment to science-based policy, environmental justice, and proactive community protection.</p> <p>Thank you for your time, your service, and your consideration of this important request.</p>	
47	Elizabeth Brewer	6/23/25	<p>Email comment:</p> <p>Dear Monitor Section Manager Wolf,</p> <p>I am writing in response to the proposed WI DNR Air Monitoring Network Plan and to respectfully request a critical enhancement to the air quality infrastructure in Southcentral Wisconsin. Specifically, I ask the Department of Natural Resources to install a regulatory-grade PM2.5 monitor in a location that accurately and comprehensively captures emissions from Beloit's major stationary sources—particularly fossil fuel-based utility operations.</p> <p>As you are aware, PM2.5 (fine particulate matter) poses significant risks to public health, especially for vulnerable populations such as children, the elderly,</p>	

Comment #	Name of Commentor	Date of Comment	Comment	Response
			<p>and those with existing respiratory or cardiovascular conditions. Despite this, there is currently a lack of sufficient regulatory monitoring in areas downwind of large polluters where exposure may be most acute and consistent. Without this level of monitoring, the true air quality burden on Beloit residents—particularly those living in frontline and fenceline communities—will continue to be underestimated or overlooked entirely. We believe this step is not only necessary but urgent. In an era of rising environmental awareness, public health accountability, and climate urgency, the infrastructure we build today will shape our region’s future resilience. A well-placed PM2.5 regulatory monitor would demonstrate the DNR’s commitment to science-based policy, environmental justice, and proactive community protection.</p> <p>Thank you for your time, your service, and your consideration of this important request.</p>	
48	<p>Midwest Environmental Advocates Dan Gustafson Clara Swetnam-Burland</p>	6/25/25	<p>Comments drafted by Midwest Environmental Advocates and signed on by Wisconsin EcoLatinos, League of Women Voters Beloit, Healthy Climate Wisconsin and Good Trouble Beloit were submitted. The full PDF of this written comment is attached below.</p>	



June 25, 2025

Mr. Ben Wolf  
c/o Air Monitoring Section  
Air Management Program  
P.O. Box 7921  
Madison WI, 53707

*Via Email to:* benjamin.wolf@wisconsin.gov

**RE: Comments of Midwest Environmental Advocates, Wisconsin Ecolatinos, League of Women Voters Beloit, Healthy Climate Wisconsin, and Good Trouble Beloit on WDNR's Draft 2026 Air Monitoring Network Plan**

Dear Mr. Wolf:

Thank you for accepting and considering public comments on the Wisconsin Department of Natural Resources 2026 Air Monitoring Network Plan. Midwest Environmental Advocates (MEA), Wisconsin Ecolatinos, League of Women Voters Beloit, Healthy Climate Wisconsin, and Good Trouble Beloit submit these comments to strongly recommend that the Department of Natural Resources place a PM<sub>2.5</sub> monitoring site in or near Beloit, Wisconsin.

**I. Beloit needs a PM<sub>2.5</sub> monitoring site in order to protect the health of its residents**

Residents and community advocates in Beloit are rightfully concerned about their exposure to PM<sub>2.5</sub> air pollution. Recognizing the danger to human health that PM<sub>2.5</sub> exposure presents, the EPA has twice lowered the maximum annual standard for PM<sub>2.5</sub>. The National Ambient Air Quality Standard (NAAQS) for annual average PM<sub>2.5</sub> was lowered from 15 µg/m<sup>3</sup> to 12 µg/m<sup>3</sup> in 2013,<sup>1</sup> and then lowered again to 9 µg/m<sup>3</sup> in 2024.<sup>2</sup> These reductions reflect the growing awareness of the extreme negative health impacts that exposure to PM<sub>2.5</sub> has on the human body.

According to the Wisconsin Department of Health Services (DHS), overexposure to PM<sub>2.5</sub> can result in "new or worsened heart and lung diseases, cancers, and even death."<sup>3</sup> Further, exposure can result in coughing, trouble breathing, scratchy throat, runny nose, irritated sinuses, stinging eyes, wheezing, shortness of breath, reduced lung function, fast heartbeat, chest pain, headaches,

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<sup>1</sup> 78 Fed. Reg. 3086. <https://www.govinfo.gov/content/pkg/FR-2013-01-15/pdf/2012-30946.pdf> (last visited June 6, 2025)

<sup>2</sup> 89 Fed. Reg. 16202. <https://www.govinfo.gov/content/pkg/FR-2024-03-06/pdf/2024-02637.pdf> (last visited June 6, 2025).

<sup>3</sup> Wisconsin Department of Health Services, Air: Outdoor Air Quality and Health. <https://www.dhs.wisconsin.gov/climate/air.htm> (last visited June 6, 2025).

asthma attacks, bronchitis, and fatigue.<sup>4</sup> Finally, PM<sub>2.5</sub> exposure creates a higher risk of developing diabetes and dementia, heart failure, heart attack, and stroke.<sup>5</sup>

Residents of Rock County, where the City of Beloit is located, have already begun experiencing these adverse health effects. PM<sub>2.5</sub> exposure is a well-known cause of increased asthma rates,<sup>6</sup> and as of 2020, Rock County was one of the top five counties in Wisconsin for asthma-related emergency department visits.<sup>7</sup>

Given the extreme health risks presented by PM<sub>2.5</sub> pollution, the residents of Beloit and the surrounding areas deserve to know the extent to which they are being exposed. Therefore, the DNR must install a monitoring site in Beloit in order to provide them with the data they need to safeguard their health.

## **II. Placing a monitoring site in Beloit would further many of the DNR's own site selection goals**

Adding a PM<sub>2.5</sub> monitoring site in or near Beloit would not only provide the residents with the data necessary to protect themselves from overexposure to PM<sub>2.5</sub> but would also further many of the DNR's own site selection goals. In the draft 2026 Air Monitoring Plan, the DNR states that site selection must be based on at least one of the listed monitoring objectives.<sup>8</sup> A monitoring site in Beloit would support at least four of these objectives.

### **A. A monitoring site in Beloit would assist the DNR in judging compliance with and/or progress made towards meeting the NAAQs.**

A key purpose of the monitoring system is to determine whether Wisconsin complies with the NAAQS. Based upon community collected data, as well as a compliance report conducted by environmental engineer Steven Klafka, P.E., PCEE of Wingra Engineering ("Wingra"), it is highly likely that the PM<sub>2.5</sub> levels in Beloit exceed 9.0 µg/m<sup>3</sup>, the maximum allowable level set by the EPA.<sup>9</sup>

Between 2019 and 2023, the nearest PM<sub>2.5</sub> monitor, located in Rockford, Illinois, has recorded annual PM<sub>2.5</sub> levels of 9.6, 8.5, and 9.0 µg/m<sup>3</sup>.<sup>10</sup> Two of these values are at or above the current NAAQS maximum of 9.0 µg/m<sup>3</sup>. The weather patterns, including prevailing southwest winds, blow emissions from Rockford to Beloit, contributing to the air pollution there.<sup>11</sup> Thus, the

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<sup>4</sup> *Id.*

<sup>5</sup> *Id.*

<sup>6</sup> See, e.g., Tiotiu AI, Novakova P, Nedeva D, Chong-Neto HJ, Novakova S, Steiropoulos P, Kowal K. *Impact of Air Pollution on Asthma Outcomes*. Int J Environ Res Public Health (2020). <https://pmc.ncbi.nlm.nih.gov/articles/PMC7503605> (last visited June 6, 2025).

<sup>7</sup> Wisconsin Department of Health Services, Bureau of Environmental and Occupational Health *Wisconsin Asthma Burden Report 2020*, at 13 (June 2020) <https://www.dhs.wisconsin.gov/publications/p02412-20.pdf> (last visited June 6, 2025).

<sup>8</sup> Wisconsin Department of Natural Resources, *Wisconsin Department of Natural Resources 2026 Air Monitoring Network Plan*, 10, (June 2025). <https://dnr.wisconsin.gov/sites/default/files/topic/AirQuality/Draft2026AirMonitorNetworkPlan.pdf>.

<sup>9</sup> 89 Fed. Reg. 16202. <https://www.govinfo.gov/content/pkg/FR-2024-03-06/pdf/2024-02637.pdf> (last visited June 5, 2024).

<sup>10</sup> Wingra Engineering, *Alliant Energy - WPL Riverside Energy Center, Beloit, Wisconsin: Evaluation of Compliance with the NAAQS for PM<sub>2.5</sub>* (April 14, 2025).

<sup>11</sup> *Id.*

annual average PM<sub>2.5</sub> levels in Beloit are at least comparable, and possibly higher, given the proximity of a large natural gas-fired power plant to the city.

Community collected data supports the conclusion that PM<sub>2.5</sub> levels in Beloit are even higher than in Rockford. According to this data, Beloit's 2023 annual PM<sub>2.5</sub> concentration was 14.8 µg/m<sup>3</sup>, well above the acceptable level.<sup>12</sup> It is possible that the 2023 data may have been influenced by the Canadian wildfires. However, the 2022 average, which was not similarly affected by wildfires, was 10.4 µg/m<sup>3</sup>, which also exceeds the current NAAQS.<sup>13</sup> Thus, there is compelling evidence both from governmental and citizen monitoring to support the conclusion that the PM<sub>2.5</sub> levels in Beloit are impermissibly high.

Additionally, PM<sub>2.5</sub> levels in and around Beloit are likely to increase in the upcoming years. Beloit is home to Riverside Energy Center, a large natural gas-fired power plant operated by Wisconsin Power & Light (WPL). The Public Service Commission recently granted a Certificate of Authority for WPL to expand the facility, and the Department's decision on the air construction permit for the facility is currently pending.<sup>14</sup> The modelling analysis summarized in the Wingra Engineering report submitted as Exhibit A to MEA's comments on behalf of Community Intervenors in the air permit proceeding indicates that with this expansion ambient annual PM<sub>2.5</sub> levels could be as high as 9.4 µg/m<sup>3</sup> in Beloit proper, and 12.6 µg/m<sup>3</sup> in nearby areas.<sup>15</sup>

Thus, as it stands, it is likely that the PM<sub>2.5</sub> levels in Beloit may exceed the acceptable maximum. However, without a monitoring site, considering the fact that the DNR does not accept the community collected data, it will be impossible for the residents of Beloit to prove this and get the relief from pollution they deserve. Therefore, to determine compliance with the NAAQS throughout the state of Wisconsin, the DNR must place a monitoring site in Beloit.

#### **B. A monitoring site in Beloit would be beneficial in determining how much various sources impact ambient pollution levels.**

Another of the DNR's stated goals regarding the air monitoring plan is to determine how much different types of sources impact ambient pollution levels.<sup>16</sup> As discussed above, Riverside Energy Center, a large natural gas-fired power plant, which is a source of PM<sub>2.5</sub> pollution, is located in the Town of Beloit, approximately 6 miles north of central Beloit. As such, Beloit would be a good candidate for a monitor intending to study the effect of Riverside Energy Center, and similarly sized natural gas power plants, on ambient PM<sub>2.5</sub> levels.

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<sup>12</sup> Public Service Commission of Wisconsin, Supplemental Environmental Assessment, Docket No: 6680-CE-187, at 17-18 (PSC REF#: 536556).

<sup>13</sup> *Id.*

<sup>14</sup> Kevin Murphy, *PSC Ok's expansion of energy center in Beloit*, Beloit Daily News (Apr. 3, 2025) [https://www.beloitdailynews.com/news/business-news/psc-oks-expansion-of-energy-center-in-beloit/article\\_27a99ef1-8540-4ae9-9fc4-4d4f9c871989.html](https://www.beloitdailynews.com/news/business-news/psc-oks-expansion-of-energy-center-in-beloit/article_27a99ef1-8540-4ae9-9fc4-4d4f9c871989.html).

<sup>15</sup> Wingra Engineering, *Alliant Energy - WPL Riverside Energy Center, Beloit, Wisconsin: Evaluation of Compliance with the NAAQS for PM<sub>2.5</sub>* (April 14, 2025).

<sup>16</sup> Wisconsin Department of Natural Resources, *Wisconsin Department of Natural Resources 2026 Air Monitoring Network Plan*, 10, (June 2025).

**C. A monitoring site in Beloit would aid the DNR in determining the highest concentration of pollutants in the state.**

Both the DNR and the EPA emphasize the importance of having a monitoring site in the area of the state which has the highest concentration of a pollutant. In the 2026 Air Monitoring plan, the DNR lists this as one of the criteria for choosing a monitoring site.<sup>17</sup> Further, the EPA emphasizes that “at least one monitor must be located at the site of expected maximum PM<sub>2.5</sub> concentration.”<sup>18</sup> Based upon the current available data, it is possible that Beloit is the area with the highest levels of PM<sub>2.5</sub> pollution in the state. According to the data provided by the DNR in the 2026 Air Monitoring Network Plan, the highest annual levels of PM<sub>2.5</sub> in 2022-2024 were recorded at two sites in Milwaukee at 8.4 µg/m<sup>3</sup> and 8.2 µg/m<sup>3</sup>, and in Madison at 8.3 µg/m<sup>3</sup>.<sup>19</sup>

Thus, if the community recorded data is accurate or close to accurate, then Beloit would have the highest PM<sub>2.5</sub> levels in the state by a wide margin (at least out of the areas monitored). Alternatively, if the data can be properly extrapolated from the nearest monitoring station in Rockford, Illinois, Beloit would have an average PM<sub>2.5</sub> level of 9.030 µg/m<sup>3</sup> between 2019-2023.<sup>20</sup> If either of these results are correct, Beloit would have the highest PM<sub>2.5</sub> levels out of the areas that the DNR monitors.<sup>21</sup>

Thus, the DNR should place a PM<sub>2.5</sub> monitoring site in or near Beloit to conclusively determine whether Beloit actually has the highest PM<sub>2.5</sub> levels in Wisconsin.

**III. The addition of a monitoring site in Beloit would be in line with EPA’s guidance to include environmental justice factors in choosing monitoring sites, as well as Wisconsin’s emphasis on forwarding environmental justice.**

In the 2024 amended PM<sub>2.5</sub> monitoring regulation, the EPA extensively documented the way in which PM<sub>2.5</sub> exposure disproportionately impacts marginalized communities. Specifically, they found “strong evidence for racial and ethnic disparities in PM<sub>2.5</sub> exposures and PM<sub>2.5</sub>-related health risk.”<sup>22</sup> In particular, they found that “there is strong evidence demonstrating that Black and Hispanic populations in particular have higher PM<sub>2.5</sub> exposures than non-Hispanic White populations.”<sup>23</sup> Further, they found that socioeconomic status (SES) may be a factor that contributes to differential risk from PM<sub>2.5</sub> related health effects, and that studies using composite

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<sup>17</sup> *Id.* at 18.

<sup>18</sup> EPA, *Air Monitoring for Fine Particulate Pollution (PM<sub>2.5</sub>) Fact Sheet* (last visited June 6, 2025).

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Wisconsin Department of Natural Resources, *Wisconsin Department of Natural Resources 2026 Air Monitoring Network Plan*, 18, (June 2025).

<sup>20</sup> Wingra Engineering, *Alliant Energy - WPL Riverside Energy Center, Beloit, Wisconsin: Evaluation of Compliance with the NAAQS for PM<sub>2.5</sub>* (April 14, 2025).

<sup>21</sup> Wisconsin Department of Natural Resources, *Wisconsin Department of Natural Resources 2026 Air Monitoring Network Plan*, 18, (June 2025).

<sup>22</sup> 89 Fed. Reg. 45, <https://www.govinfo.gov/content/pkg/FR-2024-03-06/pdf/2024-02637.pdf> (last visited June 6, 2025).

<sup>23</sup> *Id.*



measures of neighborhood SES consistently demonstrated a disparity both in PM<sub>2.5</sub> exposure and the risk of PM<sub>2.5</sub> related health impacts.<sup>24</sup>

In response to these findings, the EPA revised the guidelines for monitoring site location, stating that for areas with additional required State or Local Air Monitoring Stations (SLAMS),<sup>25</sup> “a monitoring station is to be sited in an at-risk community with poor air quality, particularly where there are anticipated effects from sources in the area.”<sup>26</sup> While Beloit is not an area with an additional required SLAMS, it is nonetheless an at-risk community where there are anticipated effects from sources in the area.

The state has similarly indicated that environmental justice is a priority, which the DNR has recognized.<sup>27</sup> Thus, placing monitoring sites in at risk communities is in accordance with both federal and state priorities.

Beloit qualifies as an at-risk community, as the city has a significantly higher percentage of nonwhite residents and low-income residents than Wisconsin as a whole. According to the US Census population estimates for 2024, 37.4% of Beloit’s population is nonwhite.<sup>28</sup> More specifically, 13.6% of Beloit’s population is Black, and 21.9% is Hispanic or Latino.<sup>29</sup> In contrast, Wisconsin’s population is 13.6% nonwhite, with 6.6% of the population being Black and 8.1% being Hispanic or Latino population.<sup>30</sup> Similarly, 16.8% of Beloit’s population is in poverty, whereas only 10.7% of Wisconsin’s population is.<sup>31</sup>

Thus, given the data from the EPA demonstrating that nonwhite and low-income populations have disparate risks from PM<sub>2.5</sub> exposure, Beloit qualifies as an at-risk community when compared to the rest of Wisconsin. This is exemplified by Beloit’s ranking on the Environmental Justice Index.<sup>32</sup> The Environmental Justice Index is a tool that measures the extent to which nonwhite and low-income communities experience disproportionate amounts of pollution exposure.<sup>33</sup> Most of Beloit has a PM<sub>2.5</sub> Environmental Justice Index score ranging from 90-100.<sup>34</sup> A minimum score of 90 indicates that the disproportionate impact of PM<sub>2.5</sub> exposure on nonwhite and low-income community members is at least 90% higher in Beloit compared to the

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<sup>24</sup> *Id.*

<sup>25</sup> 40 C.F.R. § 58.1 (2025).

<sup>26</sup> *Id.*

<sup>27</sup> Wisconsin Department of Natural Resources, *DNR Climate Action* (last visited June 6, 2025) <https://dnr.wisconsin.gov/climatechange/action>.

<sup>28</sup> United States Census Bureau, *Quick Facts Beloit city, Wisconsin* (last visited June 6, 2025) <https://www.census.gov/quickfacts/fact/table/beloitcitywisconsin/PST045224>.

<sup>29</sup> *Id.*

<sup>30</sup> United States Census Bureau, *Quick Facts Wisconsin* (last visited June 6, 2025) <https://www.census.gov/quickfacts/fact/table/WI/PST045224>.

<sup>31</sup> United States Census Bureau, *Quick Facts Beloit city, Wisconsin* (last visited June 6, 2025) <https://www.census.gov/quickfacts/fact/table/beloitcitywisconsin/PST045224>; United States Census Bureau, *Quick Facts Wisconsin* (last visited June 6, 2025) <https://www.census.gov/quickfacts/fact/table/WI/PST045224>.

<sup>32</sup> Public Environmental Data Partners, *EJ Screen* (last visited June 6, 2025) <https://pedp-ejscreen.azurewebsites.net/>.

<sup>33</sup> *Id.*

<sup>34</sup> *Id.*



rest of Wisconsin. Similarly, the disparate impact of PM<sub>2.5</sub> exposure on these populations in Beloit is at minimum 80% higher than the United States as a whole.

Therefore, Beloit is clearly an at-risk community where marginalized people are unfairly subjected to disproportionate levels of PM<sub>2.5</sub>. As such, in accordance with both the priorities described in the EPA's regulation and the state's priorities, the DNR should place a monitoring site there.

#### **IV. If the DNR plans to close any PM<sub>2.5</sub> monitoring sites, those resources could be relocated to Beloit**

MEA advocates for more air quality monitoring whenever possible and thus does not advocate for the removal of any current PM<sub>2.5</sub> monitoring sites. However, if the DNR does decide to shut down an existing PM<sub>2.5</sub> monitoring site, then the monitoring equipment should be reallocated to Beloit. The data from the Draft 5-Year Monitoring Assessment for the Region 5 States report prepared by the Lake Michigan Air Directors Consortium (LADCO), indicates that the PM<sub>2.5</sub> monitoring site currently located in Devils Lake meets the EPA criteria for shutdown.<sup>35</sup> If the DNR decides to shut down the site in Devils Lake as LADCO suggests is possible, the Department could relocate the equipment to Beloit. A major barrier preventing the DNR from placing a monitoring site in Beloit in the past has been a lack of funding.<sup>36</sup> Relocating equipment and resources from a shutdown monitoring site to Beloit would allow the DNR to overcome this barrier and monitor a community in need without requiring additional funding.

#### **V. Conclusion**

In conclusion, Beloit community members, many of whom are members of at-risk communities, are likely being exposed to PM<sub>2.5</sub> levels beyond the acceptable maximum stated in the NAAQS, putting their health at risk. However, without a monitoring site, they have no way of proving this fact, which prevents them from seeking to remedy the air pollution levels. As such, based on the comments above, MEA urges the DNR to add a PM<sub>2.5</sub> monitoring site in Beloit.

Respectfully submitted,

#### **MIDWEST ENVIRONMENTAL ADVOCATES**

Clara Swetnam-Burland  
Law Clerk

Dan Gustafson  
Senior Staff Attorney

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<sup>35</sup> Lake Michigan Air Directors Consortium, *5-Year Monitoring Network Assessment for the Region 5 States: Illinois, Indiana, Michigan, Minnesota, Ohio, and Wisconsin*, 30, (2025).

<sup>36</sup> Wisconsin Department of Natural Resources, *2025 Air Monitoring Revised Network Plan Response to Comments* (June 2024)  
<https://dnr.wisconsin.gov/sites/default/files/topic/AirQuality/2025NetworkPlanResponsetoComments.pdf>.

## **WISCONSIN ECOLATINOS**

Cristina Carvajal  
Executive Director

## **LEAGUE OF WOMEN VOTERS BELOIT**

Elizabeth Brewer  
Co-Chair, LWV Sustainability Committee

## **HEALTHY CLIMATE WISCONSIN**

Abby Novinska-Lois  
Executive Director

## **GOOD TROUBLE BELOIT**

Tony Capozziello  
President