From:	Tara Chadwick
To:	Cooley, Nathan (MPCA)
Cc:	Louis Alemayehu; Mike Neumann
Subject:	climate change rule for minnesota
Date:	Friday, August 10, 2012 1:06:49 PM

Dear MPCA:

Please accept this email as a formal request in writing for a public hearing regarding the adoption of a permanent rule in regards to the threshold "green house gas" emissions limits that contribute to climate change.

While the differences between the final rules adopted by the EPA and MPCA may end up being very similar, I feel that it is an important opportunity to both educate and be educated by the public at large who is available to attend such a hearing in Minnesota.

Thank you.

Tara Chadwick
133 East Stevens Street #201
Saint Paul, MN 55107

From:	Conti, Barbara J (MPCA)
To:	Cooley, Nathan (MPCA)
Subject:	FW: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing
Date:	Wednesday, August 08, 2012 1:38:13 PM

From: Erin Pratt [mailto:eraneyjustice@yahoo.com]
Sent: Wednesday, August 08, 2012 12:06 PM
To: Conti, Barbara J (MPCA); norma.coleman@state.mn.us
Subject: RE: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing

Dear Barbara Conti and Norma Colemnan,

I am writing to request a public hearing and hereby state that I oppose the entire set of rules. We are already facing more drastic consequences of climate change (drought, flooding, fires, increased severe weather) then previously predicted by climate scientists. It is imperative that we take swift and responsible action to curb climate change immediately. One of the most effective ways to do this is through a thorough and innovative GHG ruling.

It is hereby requested that the public hearing provide the framework for the State of Minnesota to draft our own rule making to remove the "tailoring" and include stricter requirements for the reduction of GHG emissions throughout our beautiful State and, through funds generated and/or made available by emission fees from GHG sources, begin funding truly sustainable programs.

Furthermore, it is imperative that this rule making be written to fully address and resolve the true cost/impact of GHG emissions to thoroughly educate the public and raise environmental consciousness.

Thank you in advance for preparing to discuss these and other issues at the public hearing that will help us move towards solutions that will protect the future of all Minnesotans.

Erin Pratt
21280 Minnetonka Blvd
Excelsior, MN 55331

From:	Conti, Barbara J (MPCA)
To:	Cooley, Nathan (MPCA); Fenske, MaryJean (MPCA); Bartz, Margaret (MPCA)
Subject:	FW: Air Quality Rules
Date:	Wednesday, August 08, 2012 7:34:12 AM

From: Douglas Zbikowski [dwzbikowski@gmail.com]
Sent: Tuesday, August 07, 2012 5:50 PM
To: Conti, Barbara J (MPCA); norma.coleman@state.mn.us
Subject: RE: Air Quality Rules

RE: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing

Body of Message:

Dear Barbara Conti <barbara.conti@state.mn.us> and Norma Coleman:<norma.coleman@state.mn.us>

I am writing to request a public hearing and hereby state that I oppose the entire set of rules. We are at a pivotal crossroad and can no longer accept the status quo; it is time to thoroughly address and resolve climate change through a thorough and innovative GHG ruling. It is hereby requested that the public hearing provide the framework for the State of Minnesota to draft our own rule making to remove the "tailoring" and include stricter requirements for the reduction of GHG emissions throughout our beautiful State and, through funds generated and/or made available by emission fees from GHG sources, begin funding truly sustainable programs. Furthermore, it is imperative that this rule making be written to fully address and resolve the true cost/impact of GHG emissions to thoroughly educate the public and raise environmental consciousness.

Thank you in advance for preparing to discuss these and other issues at the public hearing as we initiate a paradigm shift to model the way towards sustainability.

Doug Zbikowski
7833 Able St. NE
Spring Lake Park, MN 55432

From:	Conti, Barbara J (MPCA)
To:	Cooley, Nathan (MPCA)
Subject:	FW: Air Quality Rules
Date:	Wednesday, August 08, 2012 2:41:30 PM

From: Jack and Grace Harkness [mailto:gjharkness@comcast.net]
Sent: Wednesday, August 08, 2012 2:28 PM
To: Conti, Barbara J (MPCA); norma.coleman@state.mn.us
Subject: Air Quality Rules

Dear Barbara Conti <barbara.conti@state.mn.us> and Norma Coleman:<norma.coleman@state.mn.us>

I are writing to ask you to hold a public hearing on the regulation of greenhouse gas emissions to consider changing the current rules.

We are at a pivotal crossroad and can no longer accept the status quo; it is time to thoroughly address and resolve climate change through a thorough and innovative GHG ruling

It is hoped that the public hearing will provide the framework for the State of Minnesota to draft our own rule making to remove the "tailoring" and include stricter requirements for the reduction of GHG emissions throughout our beautiful State and, through funds generated and/or made available by emission fees from GHG sources, begin funding truly sustainable programs (i.e. refer to programs in Germany, Transition Towns, etc.???).

Furthermore, it is imperative that this rule making be written to fully address and resolve the true cost/impact of GHG emissions to thoroughly educate the public and raise environmental consciousness.

Thank you in advance for preparing to discuss these and other issues at the public hearing as we initiate a change to find the way towards sustainability.

Grace Harkness
2120 West 49th Street,
Minneapolis, MN 55419

From:	Conti, Barbara J (MPCA)
To:	Cooley, Nathan (MPCA)
Subject:	FW: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing
Date:	Friday, August 10, 2012 1:02:23 PM

From: Jon Freise [mailto:jon.e.freise@gmail.com]
Sent: Friday, August 10, 2012 11:11 AM
To: Conti, Barbara J (MPCA); norma.coleman@state.mn.us
Subject: RE: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing

Dear Barbara and Norma,

I am writing to request a public hearing. We have reached yet another year of high temperatures. The impact on our agriculture, forests, and cities (and personal budgets) of climate change gets clearer every year an only more scary. We are at a pivotal crossroad and can no longer accept the status quo; it is time to thoroughly address and resolve climate change through a thorough and innovative GHG ruling.

It is hereby requested that the public hearing provide the framework for the State of Minnesota to draft our own rule making to remove the "tailoring" and include stricter requirements for the reduction of GHG emissions throughout our beautiful State and, through funds generated and/or made available by emission fees from GHG sources, begin funding truly sustainable programs that reduce our need for fossil fuels and allow us to live inside our renewable energy budget. Minnesota is the Saudi Arabia of windows, cellulose insulation, and other efficiency enhancing building products. Let us unleash our state economy as Germany has done.

Furthermore, it is imperative that this rule making be written to fully address and resolve the true cost/impact of GHG emissions to thoroughly educate the public and raise environmental consciousness.

Thank you in advance for preparing to discuss these and other issues at the public hearing as we initiate a paradigm shift to model the way towards sustainability.

Jon Freise
3501 Cedar Ave So,
Minneapolis, Mn, 55407

From:	Conti, Barbara J (MPCA)
To:	Cooley, Nathan (MPCA)
Subject:	FW: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing
Date:	Wednesday, August 08, 2012 1:39:50 PM

From: Leslie MacKenzie [mailto:leslie.mackenzie@gmail.com]
Sent: Wednesday, August 08, 2012 11:36 AM
To: Conti, Barbara J (MPCA); norma.coleman@state.mn.us
Subject: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing

Dear Ms. Conti and Ms. Coleman

As a resident of Minneapolis and a participant in the neighborhood group, Transition Longfellow, I am writing to request a public hearing on air quality rules and hereby state that I oppose the set of rules.

We are at a critical juncture in the history of civilization, where immediate action to reduce greenhouses gases is imperative. We can no longer accept the status quo. We must address climate change with a thorough and innovative GHG ruling. Our economy depends upon it; our lives depend upon it. I hereby request that a public hearing take place and that it provide the framework for the State of Minnesota to draft our own rule making to remove "tailoring" and include stricter requirements for the reduction of GHG emissions. It is imperative that this rule making be written to include the true cost/impact of GHG emissions. Furthermore, through funds generated and/or made available by emission fees from GHG sources, we must begin funding truly sustainable programs.

Thank you in advance for preparing to discuss these and other issues at the public hearing as we initiate a paradigm shift toward sustainability.

Leslie MacKenzie
2852 35th Avenue S.
Minneapolis, MN 55406

Leslie MacKenzie *Writer/Editor*

leslie.mackenzie@gmail.com

Printing emails is SO 2009

Designed with WiseStamp - Get yours

From:	Conti, Barbara J (MPCA)
To:	Cooley, Nathan (MPCA); Fenske, MaryJean (MPCA); Bartz, Margaret (MPCA)
Subject:	FW: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing
Date:	Wednesday, August 08, 2012 10:13:41 AM

From: Chuck Prentice [mailto:chuckprentice@yahoo.com]
Sent: Wednesday, August 08, 2012 10:06 AM
To: Conti, Barbara J (MPCA); norma.coleman@state.mn.us
Subject: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing

Dear Barbara Conti and Norma Coleman:

I am writing to request a public hearing and hereby state that I oppose the entire set of rules. We are at a pivotal crossroad and can no longer accept the status quo; it is time to thoroughly address and resolve climate change through a thorough and innovative GHG ruling. It is hereby requested that the public hearing provide the framework for the State of Minnesota to draft our own rule making to remove the "tailoring" and include stricter requirements for the reduction of GHG emissions throughout our beautiful State and, through funds generated and/or made available by emission fees from GHG sources, begin funding truly sustainable programs. Furthermore, it is imperative that this rule making be written to fully address and resolve the true cost/impact of GHG emissions to thoroughly educate the public and raise environmental consciousness.

Thank you in advance for preparing to discuss these and other issues at the public hearing as we initiate a paradigm shift to model the way towards sustainability.

Sincerely,
Chuck Prentice
5009 West 60th Street
Edina, MN 55436

From:	Conti, Barbara J (MPCA)
To:	Cooley, Nathan (MPCA)
Cc:	Bartz, Margaret (MPCA); Fenske, MaryJean (MPCA)
Subject:	FW: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing
Date:	Wednesday, August 08, 2012 8:36:02 AM

From: Angela Wyatt [angelajwyatt@gmail.com]
Sent: Wednesday, August 08, 2012 8:35 AM
To: Conti, Barbara J (MPCA)
Subject: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing

Dear Barbara Conti:

I am writing to request a public hearing and hereby state that I oppose the entire set of rules. We are at a pivotal crossroad and can no longer accept the status quo; it is time to thoroughly address and resolve climate change through a thorough and innovative GHG ruling. It is hereby requested that the public hearing provide the framework for the State of Minnesota to draft our own rule making to remove the "tailoring" and include stricter requirements for the reduction of GHG emissions throughout our state and, through funds generated and/or made available by emission fees from GHG sources, begin funding truly sustainable programs. Furthermore, it is imperative that this rule making be written to fully address and resolve the true cost/impact of GHG emissions to thoroughly educate the public and raise environmental consciousness.

Thank you in advance for preparing to discuss these and other issues at the public hearing as we initiate a paradigm shift to model the way towards sustainability.

--

Angela Wyatt
www.anciaquartet.com
University of Minnesota Adjunct Faculty

From:	Conti, Barbara J (MPCA)
To:	Cooley, Nathan (MPCA); Fenske, MaryJean (MPCA); Bartz, Margaret (MPCA)
Subject:	FW: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing
Date:	Wednesday, August 08, 2012 7:34:32 AM

From: Rebecca Cramer [rebacramer@gmail.com]
Sent: Tuesday, August 07, 2012 5:00 PM
To: Conti, Barbara J (MPCA); norma.coleman@state.mn.us
Subject: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing

Dear Barbara Conti and Norma Coleman:
I am writing to request a public hearing. It is time to address climate change through a thorough and innovative GHG ruling. A public hearing will provide the framework for the State of Minnesota to draft our own rule-making to remove the "tailoring" and include stricter requirements for the reduction of GHG emissions throughout our beautiful State and, through funds generated and/or made available by emission fees from GHG sources, begin funding truly sustainable programs. It is imperative that this rule-making be written to fully address the true cost/impact of GHG emissions.

Thank you in advance for preparing to discuss these and other issues at the public hearing as we initiate a paradigm shift to model the way towards sustainability.

Respectfully,
Rebecca Cramer
3148 29th Ave. S
Mpls., MN 55406

From:	Conti, Barbara J (MPCA)
To:	Cooley, Nathan (MPCA); Bartz, Margaret (MPCA); Fenske, MaryJean (MPCA)
Subject:	FW: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing
Date:	Wednesday, August 08, 2012 7:33:38 AM

From: Kurt Kimber [kimber.kurt@gmail.com]
Sent: Wednesday, August 08, 2012 5:20 AM
To: Conti, Barbara J (MPCA); norma.coleman@state.mn.us
Subject: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing

Dear Barbara Conti and Norma Coleman:

I am writing to request a public hearing and hereby state that I oppose the entire set of rules. We are at a pivotal crossroad and can no longer accept the status quo; it is time to thoroughly address and resolve climate change through a thorough and innovative GHG ruling. It is hereby requested that the public hearing provide the framework for the State of Minnesota to draft our own rule making to remove the "tailoring" and include stricter requirements for the reduction of GHG emissions throughout our state and, through funds generated and/or made available by emission fees from GHG sources, begin funding truly sustainable programs. Furthermore, it is imperative that this rule making be written to fully address and resolve the true cost/impact of GHG emissions to thoroughly educate the public and raise environmental consciousness.

Thank you in advance for preparing to discuss these and other issues at the public hearing as we initiate a paradigm shift to model the way towards sustainability.

Kurt Kimber
4811 35th Ave S
Minneapolis, MN 55417

From:	Conti, Barbara J (MPCA)
To:	Cooley, Nathan (MPCA); Fenske, MaryJean (MPCA); Bartz, Margaret (MPCA)
Subject:	FW: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing
Date:	Tuesday, August 07, 2012 1:22:27 PM

From: Bill Konrardy [mailto:bkonrardy@gmail.com]
Sent: Tuesday, August 07, 2012 1:12 PM
To: Conti, Barbara J (MPCA); Norma Coleman
Cc: Bill Konrardy
Subject: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing

Dear Barbara Conti <barbara.conti@state.mn.us> and Norma Coleman:<norma.coleman@state.mn.us>

I am writing to request a public hearing and hereby state that I oppose the entire set of rules. We are at a pivotal crossroad and can no longer accept the status quo; it is time to thoroughly address and resolve climate change through a thorough and innovative GHG ruling to get us back to 350 ppm CO2 atmospheric state.

It is hereby requested that the public hearing provide the framework for the State of Minnesota to draft our own
rule making to remove the "tailoring" and include stricter requirements for the reduction of GHG emissions throughout our beautiful State and, through funds generated and/or made available by emission fees from GHG sources, begin funding truly sustainable programs led by grassroots efforts of Transition Town organizations and other community based organizing.

Furthermore, it is imperative that
this rule making be written to fully address and resolve the true cost/impact of GHG emissions to thoroughly educate the public and raise environmental consciousness.

Thank you in advance for preparing to discuss these and other issues at the public hearing as we initiate a paradigm shift to model the way towards sustainability.

Bill Konrardy
5748 Logan Ave S
Minneapolis, MN 55419

From:	Conti, Barbara J (MPCA)
To:	Cooley, Nathan (MPCA)
Subject:	FW: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing
Date:	Friday, August 10, 2012 4:30:39 PM

From: Kate Faye [mailto:kateefaye@gmail.com]
Sent: Friday, August 10, 2012 4:30 PM
To: Conti, Barbara J (MPCA)
Subject: RE: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing

Dear Barbara Conti:

I am writing to request a public hearing and hereby state that I oppose the entire set of rules. We are at a pivotal crossroad and can no longer accept the status quo; it is time to thoroughly address and resolve climate change through a thorough and innovative GHG ruling. We continue to reach points of no return in regards to the level of carbon dioxide in the atmosphere and need to limit/decrease the destruction and damage in severe storms, sea level rise, species extinction,etc. as much as possible. It is hereby requested that the public hearing provide the framework for the State of Minnesota to draft our own rule making to remove the "tailoring" and include stricter requirements for the reduction of GHG emissions throughout our beautiful State and, through funds generated and/or made available by emission fees from GHG sources, begin funding truly sustainable programs. Furthermore, it is imperative that this rule making be written to fully address and resolve the true cost/impact of GHG emissions to thoroughly educate the public and raise environmental consciousness.

Thank you in advance for preparing to discuss these and other issues at the public hearing as we initiate a paradigm shift to model the way towards sustainability.

Kate Faye
1362 Larpenteur Ave West
Falcon Heights, MN 55113

From:	Conti, Barbara J (MPCA)
To:	Cooley, Nathan (MPCA)
Subject:	FW: Air Quality Rules: Writing to request a hearing before the 8/30/12 deadline
Date:	Wednesday, August 08, 2012 3:48:40 PM

From: Ken Pentel [mailto:kenpentel@yahoo.com]
Sent: Wednesday, August 08, 2012 3:43 PM
To: Conti, Barbara J (MPCA); norma.coleman@state.mn.us
Subject: RE: Air Quality Rules: Writing to request a hearing before the 8/30/12 deadline

RE: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing

Dear Barbara Conti and Norma Coleman.

I am writing to request a public hearing based upon my opposition to the entire set of rules. We are at a pivotal crossroad and can no longer accept the status quo; it is time to thoroughly address and resolve climate change through a thorough and innovative GHG ruling. The reason for this is we have seen many rapid changes in weather patterns that most climate scientists agree are human induced, such as: The European heat wave of 2003, Russian heat wave of 2010 and droughts in Texas and Oklahoma.

I request that the public hearing provide the framework for the State of Minnesota to draft our own rule making to remove the "tailoring" and include stricter requirements for the reduction of GHG emissions throughout our State and the impacts that Minnesota contributes to regions beyond our borders. Funds should be generated and/or made available by emission fees from GHG sources, begin funding truly sustainable programs, such as: Germany, Sweden, Transition Towns and many more local communities and nation-states who are fast moving to reduce GHG sources. To honestly achieve these goals, it is imperative that this rule making be written to fully internalize externalities and reflect the whole–cost of these GHG sources.

Thank you for discussing this urgent issue at the upcoming public hearing as part of a necessary shift to authentic sustainability.

Ken Pentel
Director of the Ecology Democracy Network
P.O. Box 3872
Minneapolis, MN 55403
http://www.ecologydemocracynetwork.org/
http://us.mc562.mail.yahoo.com/mc/compose?to=kenpentel@yahoo.com
(612) 387-0601

From: Conti, Barbara J (MPCA)
To: Cooley, Nathan (MPCA)
Subject: FW: Air Quality Rules: Writing to request a hearing before the 8/30/12 deadline
Date: Thursday, August 09, 2012 8:00:38 AM

From: luce@usfamily.net [mailto:luce@usfamily.net]
Sent: Wednesday, August 08, 2012 4:44 PM
To: Ken Pentel; Conti, Barbara J (MPCA); norma.coleman@state.mn.us
Subject: Re: Air Quality Rules: Writing to request a hearing before the 8/30/12 deadline

People, I add my voice to the request for a hearing. We are already way late on this and the longer we delay the worse it will surely get. Forget the difficulties, think of the kids. Thank you.

David Luce
Ecology Democracy Party
Campaign Manager, Hilton for House, 59B

> ----- Original Message -----
> **From:** Ken Pentel
> **To:** barbara.conti@state.mn.us ; norma.coleman@state.mn.us
> **Sent:** Wednesday, August 08, 2012 3:42 PM
> **Subject:** RE: Air Quality Rules: Writing to request a hearing before the 8/30/12 deadline
>
> RE: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing
>
> Dear Barbara Conti and Norma Coleman.
>
> I am writing to request a public hearing based upon my opposition to the entire set of rules. We are at a pivotal crossroad and can no longer accept the status quo; it is time to thoroughly address and resolve climate change through a thorough and innovative GHG ruling. The reason for this is we have seen many rapid changes in weather patterns that most climate scientists agree are human induced, such as: The European heat wave of 2003, Russian heat wave of 2010 and droughts in Texas and Oklahoma.
>
> I request that the public hearing provide the framework for the State of Minnesota to draft our own rule making to remove the "tailoring" and include stricter requirements for the reduction of GHG emissions throughout our State and the impacts that Minnesota contributes to regions beyond our borders. Funds should be generated and/or made available by emission fees from GHG sources, begin funding truly sustainable programs, such as: Germany, Sweden, Transition Towns and many more local communities and nation-states who are fast moving to reduce GHG sources. To honestly achieve these goals, it is imperative that this rule making be written to fully internalize externalities and reflect the whole–cost of these GHG sources.
>
> Thank you for discussing this urgent issue at the upcoming public hearing as part of a necessary shift to authentic sustainability.
>
> Ken Pentel
> Director of the Ecology Democracy Network

P.O. Box 3872
Minneapolis, MN 55403
http://www.ecologydemocracynetwork.org/
http://us.mc562.mail.yahoo.com/mc/compose?to=kenpentel@yahoo.com
(612) 387-0601

From: Conti, Barbara J (MPCA)
To: Cooley, Nathan (MPCA)
Subject: FW: GHG rule comment
Date: Wednesday, August 08, 2012 2:15:24 PM

From: Paul Densmore [mailto:pmdensmore@gmail.com]
Sent: Tuesday, August 07, 2012 3:30 PM
To: Conti, Barbara J (MPCA); norma.coleman@state.mn.us
Subject:

Dear Barbara Conti and Norma Coleman:

I am writing to request a public hearing and hereby state that I oppose the entire set of rules. We are at a pivotal crossroad and can no longer accept the status quo; it is time to thoroughly address and resolve climate change through a thorough and innovative GHG ruling. Therecord heat, drought, and extreme weather is just the beginnig as imate scietists like Jaeds Hansen have predicted for 30 years now. It is hereby requested that the public hearing provide the framework for the State of Minnesota to draft our own rule making to remove the "tailoring" and include stricter requirements for the reduction of GHG emissions throughout our beautiful State and, through funds generated and/or made available by emission fees from GHG sources, begin funding truly sustainable programs like Transition Towns. Furthermore, it is imperative that this rule making be written to fully address and resolve the true cost/impact of GHG emissions to thoroughly educate the public and raise environmental consciousness.

Thank you in advance for preparing to discuss these and other issues at the public hearing as we initiate a paradigm shift to model the way towards sustainability.

Paul Densmore
3435 Colfax Ave So #102
Minneapolis , MN 55408

From:	Conti, Barbara J (MPCA)
To:	Cooley, Nathan (MPCA)
Subject:	FW: Hearing needed
Date:	Friday, August 10, 2012 1:02:33 PM

From: Terry A. ford [mailto:tahomes@comcast.net]
Sent: Friday, August 10, 2012 11:28 AM
To: Conti, Barbara J (MPCA); norma.coleman@state.mn.us
Subject: Hearing needed

RE: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing

Dear Barbara Conti (barbara.conti@state.mn.us) and Norma Coleman (norma.coleman@state.mn.us).

I am writing to request a public hearing it is time to thoroughly address and resolve climate change through a thorough and innovative GHG ruling. The reason for this is we have seen many rapid changes in weather patterns that most climate scientist agree are human induced, such as: The European heat wave of 2003, Russian heat wave of 2010 and droughts in Texas and Oklahoma.

I request that the public hearing provide the framework for the State of Minnesota to draft our own rule making to remove the "tailoring" and include stricter requirements for the reduction of GHG emissions throughout our State . Funding truly sustainable programs Such as: Germany, Sweden, Transition Towns and many more local communities and nation-states who are fast moving to reduce GHG sources. To honestly achieve these goals, it is imperative that this rule making be written to fully internalize externalities and reflect the whole–cost of these GHG sources.

Thank you for discussing this urgent issue at the upcoming public hearing as part of a necessary shift to authentic sustainability.

Terry A. ford -3404 Aldrich Ave.S. MINNEAPOLIS. Minnesota 55408

Sent from my iPad

From:	Conti, Barbara J (MPCA)
To:	Cooley, Nathan (MPCA); Bartz, Margaret (MPCA); Fenske, MaryJean (MPCA)
Subject:	FW: Hearing Request: MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases
Date:	Tuesday, August 07, 2012 3:31:37 PM
Attachments:	image001.png

From: Annette Rondano [mailto:backrub2@bitstream.net]
Sent: Tuesday, August 07, 2012 2:10 PM
To: Conti, Barbara J (MPCA)
Subject: Hearing Request: MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases

To whom it may concern:

I am writing to request a public hearing and would like to go on record as opposing the permanent rules the MPCA plans to adopt for Federal Air Permit Thresholds for Greenhouse Gases.

Don Shelby and ALL other prominent climate and weather scientists have sounded the alarm about the most recent unprecedented climate events and why we can expect them to INCREASE. This is all about Global Warming, something that we now refer to softly as "Climate Change". In fact, if we do not look to drastic changes in our policies and actions, we will certainly be beyond the point of turning back within this very year.

We are at a pivotal crossroads and can no longer accept the status quo; it is time to thoroughly address and resolve climate change through a thorough and innovative GHG ruling.

It is hereby requested that a public hearing be called to provide the framework for the State of Minnesota to draft our own rule-making, to remove the "tailoring" and include stricter requirements for the reduction of GHG emissions throughout our beautiful State and, through funds generated and/or made available by emission fees from GHG sources, begin funding truly sustainable programs *and city by city guidelines for far-reaching initiatives on the local level.*

It is imperative that this rule-making be written to fully address and resolve the true cost/impact of GHG emissions to thoroughly educate the public and raise environmental consciousness in the hopes of turning back the tide of catastrophic climate change.

Thank you in advance for preparing to discuss these and other issues at the public hearing as we initiate a paradigm shift to model the way towards sustainability.

Annette Rondano
4217 45th Avenue South
Minneapolis, MN 55406
612-221-0131

backrub2@bitstream.net
www.greatbackrubs.com

Good things happen...pass it on!

Please consider the environment before printing this email

From: Conti, Barbara J (MPCA)
To: Cooley, Nathan (MPCA)
Subject: FW: Hearings on Greenhouse Gases
Date: Friday, August 10, 2012 4:26:53 PM

From: Joe Schmit [mailto:joeschmit@q.com]
Sent: Friday, August 10, 2012 2:20 PM
To: norma.coleman@state.mn.us; Conti, Barbara J (MPCA)
Subject: Hearings on Greenhouse Gases

Dear Norma and Barbara,

I read Storms of my Grandchildren by Jim Hansen. The future is scary. I believe that Greenhouse Gasses need to be regulated. Please hold hearings by the end of August to figure out what can be done.

Joe & Marilyn Schmit
JoeSchmit@q.com
952-935-1305

From: Conti, Barbara J (MPCA)
To: Cooley, Nathan (MPCA)
Subject: FW: Public hearing
Date: Thursday, August 09, 2012 8:01:20 AM

-----Original Message-----
From: Jim Lovestar [mailto:jimbo@consciousbody.info]
Sent: Wednesday, August 08, 2012 5:07 PM
To: Conti, Barbara J (MPCA)
Subject: Public hearing

Ms. Conti,

I know you are busy. I'll be brief.
I am writing to request a public hearing since I oppose the entire set of rules. I request a thorough and innovative GHG ruling.
I further request that the public
hearing provide the framework for the State of Minnesota to draft our own rule making to remove the "tailoring" and include stricter requirements for the reduction of GHG emissions throughout our beautiful State and, through funds generated and/or made available by emission fees from GHG sources. To conclude, please work so that this rule making be written to fully address and resolve the true cost/impact of GHG emissions to thoroughly educate the public and raise environmental consciousness.

Jim Lovestar
612-588-8984
Fear is not a place to stay, but a short bridge to cross.--Kevin Elzia

From:	Conti, Barbara J (MPCA)
To:	Cooley, Nathan (MPCA)
Subject:	FW: request a hearing RE: air quality rules: the mpca proposes to adopt permanent rules for federal air permit thesholds for greenhouse gases
Date:	Thursday, August 09, 2012 8:01:10 AM

From: Laura Hedlund [mailto:ljhedlund@gmail.com]
Sent: Wednesday, August 08, 2012 4:47 PM
To: norma.coleman@state.mn.us; Conti, Barbara J (MPCA)
Subject: request a hearing RE: air quality rules: the mpca proposes to adopt permanent rules for federal air permit thesholds for greenhouse gases

I am writing to request a public hearing and hereby state that I oppose the entire set of rules. We are at a pivotal crossroad and can no longer accept the status quo.

We need to courage to see that half of the country is now in drought. We need empathy for the people of Duluth. Now is time to thoroughly address and resolve climate change through a thorough and innovative GHG ruling. It is hereby requested that the public hearing provide the framework for the State of Minnesota to draft our own rule making to remove the "tailoring" and include stricter requirements for the reduction of GHG emissions throughout our beautiful State and, through funds generated and/or made available by emission fees from GHG sources.

Thank you,

Laura Hedlund
1364 wilderness run drive
Eagan, MN 55123
651 755 5253

From:	Conti, Barbara J (MPCA)
To:	Cooley, Nathan (MPCA)
Subject:	FW: Request for a Hearing for Green House Gas Rules
Date:	Friday, August 10, 2012 1:01:46 PM

From: Tom Marks [mailto:tmarks@hickorytech.net]
Sent: Friday, August 10, 2012 12:53 AM
To: Conti, Barbara J (MPCA)
Cc: norma.coleman@state.mn.us
Subject: Request for a Hearing for Green House Gas Rules

Dear Barbara Conti and Norma Coleman,

I am writing to request a public hearing the entire set of Green House Gas (GHG) rules. We are at a pivotal crossroad and can no longer accept the status quo; it is time to thoroughly address and resolve climate change through a thorough and innovative GHG ruling. The reason for this is we have seen many rapid changes in weather patterns that most climate scientist agree are human induced such as: The European heat wave of 2003, Russian heat wave of 2010 and droughts in Texas and Oklahoma this year.

I request that the public hearing provide the framework for the State of Minnesota to draft its own rules, remove the "tailoring" and include stricter requirements for the reduction of GHG emissions throughout our State and the impacts that Minnesota contributes to regions beyond our borders. We should impose emission fees on GHG sources and use the fees to fund truly sustainable programs such as those used in Germany, Sweden, and Transition Towns that are fast moving to reduce GHG sources. To honestly achieve these goals, it is imperative that this rule making be written to fully internalize externalities and reflect the whole–cost of these GHG sources.

Thank you for discussing this urgent issue at the upcoming public hearing as part of a necessary shift to authentic sustainability.

Tom Marks
428 Wheeler Ave
N. Mankato, MN 56003
507-388-3001

From:	Conti, Barbara J (MPCA)
To:	Cooley, Nathan (MPCA)
Subject:	FW: Request for a public hearing
Date:	Wednesday, August 08, 2012 1:39:56 PM

From: john schmid [mailto:co-earthling@usiwireless.com]
Sent: Wednesday, August 08, 2012 11:31 AM
To: Conti, Barbara J (MPCA)
Subject: Request for a public hearing

Dear Barbara Conti,

I am writing to request a public hearing and hereby state that I oppose the lowering of standards on greenhouse gas emissions to accommodate industry concerns or for other reasons. We are at a pivotal crossroad and can no longer accept the status quo; it is time to thoroughly address and resolve climate change through a thorough and innovative GHG ruling. It is hereby requested that the public hearing provide the framework for the State of Minnesota to draft our own rule making to remove the "tailoring" and include stricter requirements for the reduction of GHG emissions throughout our beautiful State and, through funds generated and/or made available by emission fees from GHG sources, begin funding truly sustainable programs. I would like to see Minnesota become an innovative leader in trying to save our planet from the worst ravages of climate change. We have already this summer seen in Minnesota and around the country the disastrous effects climate change can have.

Furthermore, it is imperative that this rule making be written to fully address and resolve the true cost/impact of GHG emissions to thoroughly educate the public and raise environmental consciousness.

Thank you in advance for preparing to discuss these and other issues at the public hearing as we initiate a paradigm shift to model the way towards sustainability.

Sincerely,

John Schmid
2241 Minneapolis Ave.
Minneapolis, Mn. 55406

From:	Conti, Barbara J (MPCA)
To:	Cooley, Nathan (MPCA)
Subject:	FW: Request for Climate Change Hearing
Date:	Friday, August 10, 2012 4:35:01 PM
Attachments:	Request for Hearing.doc

From: Kay Graham [mailto:kaynygaardgraham@yahoo.com]
Sent: Friday, August 10, 2012 4:32 PM
To: Conti, Barbara J (MPCA)
Subject: Request for Climate Change Hearing

Request that hearing be held on Green House Gas rulemaking

Dear Mr. Cooley and Ms. Conti:

In reference to your Dual Notice:

1) Notice of Intent to Adopt Rules Without a Public Hearing Unless 25 or More Persons Request a Hearing, and Notice of Hearing if 25 or More Requests for Hearing are Received

2) Proposed Amendment to Agency Rules Implementing Permanent Federal Air Permit Threshold Regulatory Relief for Greenhouse Gases (GHGs) .. (http://www.pca.state.mn.us/index.php/view-document.html?gid=18059)

I request that the scheduled August 30th hearing be held on the proposed Permanent Green House Gas (GHG) Rules.

To clarify: The Temporary Rules that were adopted in 2011 must not be made permanent without more public scrutiny and input. The Federal guidelines are totally inappropriate and unacceptable because they will not accomplish the task for which you say they are intended. Why, then, should the MPCA agree to implement these rules on a permanent basis?

The MPCA has the authority to adopt rules setting a higher standard than EPA has required. It is clear to me that the MPCA should do its due-diligence, to exercise its authority and incorporate the more appropriate lower threshold for CO2-e emissions.

Additionally, It is TOTALLY irresponsible for the MPCA to promote "biomass-fired or biogenic processes" while seeking to avoid considering the climate-forcing emissions of these processes. Emissions of this sort, and facilities responsible for such emissions, should be fully incorporated, not exempted, from the Minnesota rule.

Respectfully,
Kay Nygaard Graham
3037 Emerson Ave. S.
Minneapolis, MN,

From:	Conti, Barbara J (MPCA)
To:	Cooley, Nathan (MPCA); Bartz, Margaret (MPCA); Fenske, MaryJean (MPCA)
Subject:	FW: Request for hearing re: Greenhouse Gasses
Date:	Wednesday, August 08, 2012 7:33:08 AM

From: Robert Young Walser [transition@bobandjulie.net]
Sent: Wednesday, August 08, 2012 6:53 AM
To: Conti, Barbara J (MPCA); norma.coleman@state.mn.us
Subject: Request for hearing re: Greenhouse Gasses

Dear Norma Coleman and Barbara Conti,

I am writing to request a public hearing and hereby state that I oppose the entire set of rules. We are at a pivotal crossroad and can no longer accept the status quo; it is time to thoroughly address and resolve climate change through a thorough and innovative greenhouse gasses ruling. I add my voice to those requesting that the public hearing provide the framework for the State of Minnesota to draft our own rule making to remove the "tailoring" and include stricter requirements for the reduction of greenhouse gas emissions throughout our State. Furthermore, it is imperative that this rule making be written to fully address and resolve the true cost/impact of greenhouse gas emissions to thoroughly educate the public and raise environmental consciousness.

Thank you in advance for preparing to discuss these and other issues at the public hearing as we initiate a paradigm shift to model the way towards sustainability.

Robert Young Walser
2308 Fremont Ave S
Minneapolis, MN, 55405

- - - - -
Bob Walser
transition@bobandjulie.net

From:	Conti, Barbara J (MPCA)
To:	Cooley, Nathan (MPCA)
Subject:	FW: Requesting a hearing on Green House Gas Rules
Date:	Friday, August 10, 2012 1:07:40 PM

From: Brian Nowak [mailto:kbrian.nowak@gmail.com]
Sent: Friday, August 10, 2012 11:57 AM
To: Conti, Barbara J (MPCA)
Subject: Requesting a hearing on Green House Gas Rules

10 August 2012

Dear Mr. Cooley and Ms. Conti:

Re: Request that a hearing be held on Green House Gas rulemaking

Ref: http://www.pca.state.mn.us/index.php/view-document.html?gid=18059

I request that the scheduled August 30th hearing be held on the proposed Permanent Green House Gas (GHG) Rules.

I question the entire set of rules as proposed and as adopted temporarily in 2011.

The proposed rules have such a high threshold - 100 thousand tons/year CO2-e - that they will be seriously ineffective in curtailing GHG emissions in Minnesota.

The MPCA has the authority to adopt rules setting a higher standard than EPA has required. It strongly appears that authority should be exercised for a much lower threshold for CO2-e emissions.

Yours very truly,

K.Brian Nowak
1735 Perkins Lane
Maple Plain, MN. 55359

From:	Conti, Barbara J (MPCA)
To:	Cooley, Nathan (MPCA)
Subject:	FW: Subject: RE: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing
Date:	Thursday, August 09, 2012 8:01:34 AM

From: Maureen Hackett [mailto:maureenhackettmd@gmail.com]
Sent: Wednesday, August 08, 2012 5:11 PM
To: Conti, Barbara J (MPCA); norma.coleman@state.mn.us
Subject: Subject: RE: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing

Subject:

RE: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing

Dear Barbara Conti and Norma Coleman,

I am writing to request a public hearing and hereby state that I oppose the entire set of rules. We are at a pivotal crossroad and can no longer accept the status quo; it is time to thoroughly address and resolve climate change through a thorough and innovative Green House Gas (GHG) ruling. It is hereby requested that the public hearing provide the framework for the State of Minnesota to draft our own rule making to remove the "tailoring" and include stricter requirements for the reduction of GHG emissions throughout our beautiful State and, through funds generated and/or made available by emission fees from GHG sources. Furthermore, it is imperative that this rule making be written to fully address and resolve the true cost/impact of GHG emissions to thoroughly educate the public and raise environmental consciousness.

Thank you in advance for preparing to discuss these and other issues at the public hearing as we initiate a paradigm shift to model the way towards sustainability.

Sincerely,

Maureen Hackett, MD
PO Box 4099
Hopkins MN 55343

From:	Conti, Barbara J (MPCA)
To:	Cooley, Nathan (MPCA)
Subject:	FW: Writing to request a hearing on MPCA rules for air permit thresholds for greenhouse gases
Date:	Wednesday, August 08, 2012 3:29:28 PM

From: Lois Norrgard [mailto:Lois@alaskawild.org]
Sent: Wednesday, August 08, 2012 3:25 PM
To: Conti, Barbara J (MPCA); 'norma.coleman@state.mn.us'
Subject: Writing to request a hearing on MPCA rules for air permit thresholds for greenhouse gases

Dear Barbara Conti and Norma Coleman,

RE: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing

I am writing to request a public hearing and hereby state that I oppose the entire set of rules.

With the present drought, floods, fires out west, and ever increasing global climate change we are now entering a time where we can no longer accept the status quo; it is time to thoroughly address and resolve climate change through a thorough and innovative GHG ruling

It is hereby requested that the public hearing provide the framework for the State of Minnesota to draft our own rule making to remove the "tailoring" and include stricter requirements for the reduction of GHG emissions throughout our beautiful State and, through funds generated and/or made available by emission fees from GHG sources, begin funding truly sustainable programs. Minnesota can lead the way through innovation and clean energy programs for the rest of the country.

Furthermore, it is imperative that this rule making be written to fully address and resolve the true cost/impact of GHG emissions to thoroughly educate the public and raise environmental consciousness. The costs we face to our food crops (our corn, soybeans as well as apple crops have all been in the news recently), health, wildlife and environment.

Thank you in advance for preparing to discuss these and other issues at the public hearing as we initiate a paradigm shift to model the way towards sustainability.

Lois Norrgard
10368 Columbus Circle,
Bloomington MN 55420
952-881-7282

From:	Jon Freise
To:	Cooley, Nathan (MPCA)
Subject:	Fwd: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing
Date:	Friday, August 10, 2012 11:13:06 AM

---------- Forwarded message ----------
From: **Jon Freise** <jon.e.freise@gmail.com>
Date: Fri, Aug 10, 2012 at 11:10 AM
Subject: RE: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing
To: barbara.conti@state.mn.us, norma.coleman@state.mn.us

Dear Barbara and Nathan,

I am writing to request a public hearing. We have reached yet another year of high temperatures. The impact on our agriculture, forests, and cities (and personal budgets) of climate change gets clearer every year an only more scary. We are at a pivotal crossroad and can no longer accept the status quo; it is time to thoroughly address and resolve climate change through a thorough and innovative GHG ruling.

It is hereby requested that the public hearing provide the framework for the State of Minnesota to draft our own rule making to remove the "tailoring" and include stricter requirements for the reduction of GHG emissions throughout our beautiful State and, through funds generated and/or made available by emission fees from GHG sources, begin funding truly sustainable programs that reduce our need for fossil fuels and allow us to live inside our renewable energy budget. Minnesota is the Saudi Arabia of windows, cellulose insulation, and other efficiency enhancing building products. Let us unleash our state economy as Germany has done.

Furthermore, it is imperative that this rule making be written to fully address and resolve the true cost/impact of GHG emissions to thoroughly educate the public and raise environmental consciousness.

Thank you in advance for preparing to discuss these and other issues at the public hearing as we initiate a paradigm shift to model the way towards sustainability.

Jon Freise
3501 Cedar Ave So,
Minneapolis, Mn, 55407

From: Ackroeger@aol.com
To: Cooley, Nathan (MPCA); Conti, Barbara J (MPCA)
Subject: Hearing be held on Green House Gas rulemaking
Date: Friday, August 10, 2012 5:32:16 AM

---

10 August, 2012

Dear Mr. Cooley and Ms. Conti:

Re: Request that a hearing be held on Green House Gas rulemaking

Ref: http://www.pca.state.mn.us/index.php/view-document.html?gid=18059

I request that the scheduled August 30th hearing be held on the proposed Permanent Green House Gas (GHG) Rules.

I question the entire set of rules as proposed and as adopted temporarily in 2011.

The proposed rules have such a high threshold - 100 thousand tons/year CO2-e - that they will be ineffective in seriously curtailing GHG emissions in Minnesota.

The MPCA has the authority to adopt rules setting a higher standard than EPA has required. It strongly appears that authority should be exercised for a much lower threshold for CO2-e emissions.

Yours very truly,

Amelia Kroeger
65 Stubbs Bay Road
Maple Plain MN 55359-9671
952-476-6126

From:	Suzanne
To:	Cooley, Nathan (MPCA); Conti, Barbara J (MPCA)
Subject:	Hearing Request on Green House Gas rulemaking
Date:	Friday, August 10, 2012 2:13:14 PM

Dear. Ms. Conto and Mr. Cooley,

It is with urgent concern that I request the scheduled Hearing on the proposed Permanent Green House Gas Rules be held on August 30th.

After this summer, and thousands of record breaking temperatures, it would seem apparent that erring on the side of more conservative CO2-e emission tolerance is needed. I therefore oppose the adopted temporary 2011 rules, and ask for a more aggressive agenda with a lower threshold for CO2 emmisions than that required by the EPA.

Please advocate for and protect us.

Respectfully submitted,

Suzanne Rohlfing
Rochester, MN

From: Elanne Palcich
To: Cooley, Nathan (MPCA); Conti, Barbara J (MPCA)
Subject: Hearing Request
Date: Friday, August 10, 2012 1:38:03 PM

To: Nathan Cooley
Barbara Conti
Minnesota Pollution Control Agency
520 Lafayette Rd. N.
St. Paul, MN 55155-4194

Date: August 10, 2012

Re: Written request for a hearing on "*Proposed Amendment to Agency Rules Implementing Permanent Federal Air Permit Threshold Regulatory Relief for Greenhouse Gases (GHGs) ...*"

I request an August 30 hearing on such proposed amendment /rules based upon the following:

1) July of 2012 has been the hottest July on record.
2) Drought conditions are affecting 24% of the corn/soybean belt.
3) Low water conditions are affecting parts of California's valley known for growing food crops.
4) Wild fires in Colorado and other states are costing taxpayers millions of dollars in fire-fighting, and loss of homes. No one mentions the impacts to the ecosystems.
5) In 2011, U.S. Forest Service policies contributed to the Pagami Creek conflagration which destroyed 100,000 acres of the BWCA. The Forest Service was relying on computer data and weather reports as their scientific basis, rather than observing conditions on the ground. The Forest Service has now revised its fire policy.
6) Despite evidence in front of our faces that climate change includes the extremes of heat and cold/ drought and flooding, scientists and agencies claim they do not have enough "science" to really understand what is happening.
7) We cannot wait for such science when there is already enough information to indicate that CO2, caused by industrialization, is contributing to global warming.
8) Our agencies have a responsibility for the health and welfare of the public.

I believe that the proposed temporary rules do not go far enough in reducing carbon emissions and/or preventing CO2 emissions from rising above current levels. One cannot eliminate most small CO2 emitters without considering the cumulative effects.

I believe that biomass is not a worthy replacement of current CO2 emitters. This is where we actually need science ahead of permitting facilities that will contribute to CO2

emissions. Once an industry gets permitted, it's almost impossible to shut it down, because now you have people dependent on those jobs.

Of utmost importance, MPCA rules must take into account proposed sulfide mining, which is set to destroy carbon sequestering wetlands throughout northeast Minnesota. A moratorium on sulfide mining due to its intense demand for fuel and electricity, along with the destruction of wetlands, would immediately help prevent increasing emissions of CO2.

We cannot continue on our current path. Current MPCA policies will result in a much diminished environment along with a food crisis.

I therefore submit my request for an August 30 public hearing on greenhouse gas releases.

Elanne Palcich
29 SE 5th St.
Chisholm, MN 55719
218-254-3754

From:	Holland, Jessica
To:	Cooley, Nathan (MPCA)
Subject:	MPCA Proposed Rules Relating to Greenhouse Gas Permit Requirements
Date:	Friday, August 10, 2012 12:41:36 PM
Attachments:	Cooley MPCA 8-10-12.pdf

Dear Mr. Cooley:

Please see the attached letter from the Minnesota Chamber of Commerce, regarding the above-entitled matter.

Thank you.

Jessica Holland
Public Policy Assistant
Minnesota Chamber of Commerce
400 Robert Street North, Suite 1500
St. Paul, Minnesota 55101
(651) 292-4695
jholland@mnchamber.com
www.mnchamber.com

2012 BUSINESS CONFERENCE & ANNUAL MEETING
September 25 | 7:30 a.m.-1:30 p.m. | Hilton Minneapolis
Featuring Trish Regan as keynote and three tracks on *people. profit.* and *policy.*

For more details and to register online click here.

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MINNESOTA CHAMBER of COMMERCE

100 business unified.

August 10, 2012

Nathan Cooley
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

RE: **Minnesota Chamber of Commerce Comments on MPCA Proposed Rules Relating to Greenhouse Gas Permit Requirements**

Dear Mr. Cooley:

The Minnesota Chamber of Commerce (Chamber) welcomes the opportunity to comment on the Proposed Permanent Rules Relating to Greenhouse Gas Permit Requirements as published in the Minnesota *State Register* on July 9, 2012.

The Chamber represents approximately 2,600 members across Minnesota reflecting all types and sizes of businesses.

We understand that the rules are required in order that the state air quality regulatory program be consistent with Environmental Protection Agency (EPA) rules. We have comments on two sections of the rule. Our comments are the same as comments that you will receive from Xcel Energy. This letter will summarize the comments; however, we also fully endorse the comments that will be submitted by Xcel Energy.

We request that the MCPA amend the rule as suggested in the comments below and in the Xcel Energy letter.

1. **Proposed Rules 7007.1450, subpart 2. Minor amendment applicability language should be changed to allow longer compliance period.**

The proposed language reads: "if a regulatory change results in existing insignificant activities no longer qualifying as such, the owners and operators must submit an application within 30 days of the regulations effective date to incorporate those emission units or activities into the facilities permit."

400 ROBERT STREET NORTH, SUITE 1500, ST. PAUL, MN 55101
T: 651/292-4650 800/821-2230 F: 651/292-4656 WWW.MNCHAMBER.COM

20% POST CONSUMER FIBER

The Chamber agrees with the MPCA that a due date is necessary to avoid the implication that the amendment is due on the effective date of the regulation that disqualifies the activity as an insignificant activity. However, the 30 day time period is too short. To comply with the submission requirement, a facility must identify the regulatory change and determine the appropriate action and information required for a permit application. These steps may require the retention of an outside consultant. The proposed 30 day timeline is unreasonable.

As the Chamber has worked with the MPCA on improving the efficiency of the permitting process, we all agree that the submission of an accurate application is critical to meeting permit issuance goals. This is less likely if an application is prepared in haste, resulting in more review time and delays in issuance.

We note that Minnesota Rules 7007.0400, subparts 3-5 describe situations where sources are allowed 180 days or 365 days for application submission. The Chamber believes that the same timeline is appropriate for an application to remove an activity from the insignificant activity category.

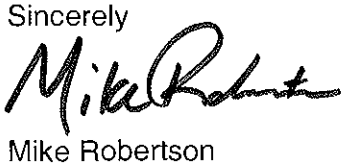
2. **New references to "owners and operators" in the proposed rule should be deleted.**

The comments submitted by Xcel Energy describe situations where it is inappropriate that a required action be taken by both the owner and operator. The MPCA's proposed insertion of "owner and operator" will create confusion and uncertainty. As noted in Xcel's comments, federal and state air rules are replete with the term "owner or operator" in relation to permit obligations. The multiple insertion of a different term has the potential to create unnecessary difficulties of interpretation.

The Chamber endorses Xcel's suggestion that the MPCA can achieve its objective for clarity by adding a statement at the beginning of Chapter 7007 saying that for any source with air emissions that trigger the requirement for a permit, the "owner or operator" of the source must apply for the permit.

The Minnesota Chamber of Commerce appreciates this opportunity to comment on the proposed rules. If there are questions, contact me at 651-260-1610 or mrobertson@mnchamber.com.

Sincerely



Mike Robertson
Environmental Policy Consultant

From: Jan Greenfield
To: Cooley, Nathan (MPCA); Conti, Barbara J (MPCA)
Subject: PLEASE HOLD HEARING ON GREEN-HOUSE-GAS RULES!
Date: Saturday, August 11, 2012 12:38:10 PM

To: Mr. Cooley & Ms. Conti

I am not a native-born Minnesotan but have lived here for more than 35 years. I have always been proud that Minnesota is a state where we respect & protect our natural resources -- not just our lakes & forests, but our human populations as well. It's becoming increasingly obvious that extreme weather events -- such as drought & flooding -- are threatening our state, & our earth!

What can we do about it? We need to stop pouring CO2 into our fragile atmosphere. What can the MPCA do about it? You need to hold a PUBLIC HEARING & then take a bold & unmistakable stance against the "quick buck" philosophy that's been pervading our state -- & our nation.

Our children & grandchildren are going to pay a HUGE PRICE -- if not even extinction -- if we at this PRESENT MOMENT don't stand up & take brave & smart measures to protect ALL of our natural resources. We can't continue to let polluting businesses "off the hook" unless we are dead set on DEGRADING the beautiful state that we have inherited.

A few vocal, & wealthy interests have been chipping away at the environmental protections in Minnesota over the past several years. YOU are the MPCA (POLLUTION CONTROL is in there!) Please exercise your authority to genuinely protect the health of Minnesotans & its natural resources; you have been named the keeper of the hen house; please don't be a fox!

Sincerely,
Jan Greenfield
Highland Park, MN

From: Angela Wyatt
To: Cooley, Nathan (MPCA)
Subject: Re: FW: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing
Date: Friday, August 10, 2012 2:35:03 PM
Attachments: image001.png

Sorry, 55417

On Fri, Aug 10, 2012 at 1:28 PM, Cooley, Nathan (MPCA) <nathan.cooley@state.mn.us> wrote:

> Dear Ms. Wyatt:
>
> Thanks for the street address. Would you please provide a zip code too? Certain actions may require mailing to you. Thanks
>
> ***Nathan Brooks Cooley***
>
> Rules Coordinator
>
> 651-757-2290 v
>
> 651-297-8676 x
>
> Minnesota Pollution Control Agency
>
> ---
>
> **From:** Angela Wyatt [mailto:angelajwyatt@gmail.com]
> **Sent:** Friday, August 10, 2012 11:51 AM
> **To:** Cooley, Nathan (MPCA)
> **Subject:** Re: FW: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing
>
> I live at 4811-35th Ave. S.
> Mpls.
>
> Thank you!
>
> Angela Wyatt
>
> On Fri, Aug 10, 2012 at 10:34 AM, Cooley, Nathan (MPCA) <nathan.cooley@state.mn.us> wrote:
>
> Dear Ms. Wyatt:

Thank you for your thoughtful request. Please provide a full street mailing address to ensure the validity of your request (per instructions in the notice).

Thanks

Nathan Brooks Cooley

Rules Coordinator

651-757-2290 v

651-297-8676 x

Minnesota Pollution Control Agency

From: Conti, Barbara J (MPCA)
Sent: Wednesday, August 08, 2012 8:36 AM
To: Cooley, Nathan (MPCA)
Cc: Bartz, Margaret (MPCA); Fenske, MaryJean (MPCA)
Subject: FW: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing

---

From: Angela Wyatt [angelajwyatt@gmail.com]
Sent: Wednesday, August 08, 2012 8:35 AM
To: Conti, Barbara J (MPCA)
Subject: Air Quality Rules: the MPCA Proposes to Adopt Permanent Rules for Federal Air Permit Thresholds for Greenhouse Gases - Writing to request a hearing

Dear Barbara Conti:

I am writing to request a public hearing and hereby state that I oppose the entire set of rules. We are at a pivotal crossroad and can no longer accept the status quo; it is time to thoroughly address and resolve climate change through a thorough and innovative GHG ruling. It is hereby requested that the public hearing provide the framework for the State of Minnesota to draft our own rule making to remove the "tailoring" and include stricter requirements for the reduction of GHG emissions throughout our state and, through funds generated

and/or made available by emission fees from GHG sources, begin funding truly sustainable programs. Furthermore, it is imperative that this rule making be written to fully address and resolve the true cost/impact of GHG emissions to thoroughly educate the public and raise environmental consciousness.

Thank you in advance for preparing to discuss these and other issues at the public hearing as we initiate a paradigm shift to model the way towards sustainability.

--

Angela Wyatt
www.anciaquartet.com
University of Minnesota Adjunct Faculty

--

Angela Wyatt
www.anciaquartet.com
University of Minnesota Adjunct Faculty

--

Angela Wyatt
www.anciaquartet.com
University of Minnesota Adjunct Faculty

From: healingsystems69@gmail.com on behalf of Kristen Eide-Tollefson
To: Cooley, Nathan (MPCA); Conti, Barbara J (MPCA)
Subject: Re: GHG ruling
Date: Friday, August 10, 2012 9:00:08 AM

Request that hearing be held on Green House Gas rulemaking

Dear Mr. Cooley and Ms. Conti:

Ref: ***"Dual Notice: Notice of Intent to Adopt Rules Without a Public Hearing Unless 25 or More Persons Request a Hearing, and Notice of Hearing if 25 or More Requests for Hearing are Received Proposed Amendment to Agency Rules Implementing Permanent Federal Air Permit Threshold Regulatory Relief for Greenhouse Gases (GHGs) ..."*** (http://www.pca.state.mn.us/index.php/view-document.html?gid=18059)

I request that the scheduled August 30th hearing be held on the proposed Permanent Green House Gas (GHG) Rules, to address temporary proposed rules. Thresholds are insufficient to challenge expanding GHG emissions in Minnesota. The MPCA has the authority to adopt rules setting a higher standard than EPA has required, and this is clearly a matter in which that authority should be exercised. Additional information should be gathered and public hearing held to evaluate and address feasibility of adopting a lower threshold.

The current plan to follow EPA's deferral, rather than to actively prepare Minnesota's biomass industry for these changes may not benefit the state's industry in the long run. Particularly given the increasing air alert pattern for Mn -- responsible, proactive investigation and active support of reduced GHG emissions, through incorporation into the rule -- will benefit all parties in the long term.

Thank you for your excellent ongoing notification of citizens, as to the daily health of our air.

Yours very truly,

Kristen Eide-Tollefson
Frontenac, MN 55026
1-651-345-5488

From: healingsystems69@gmail.com on behalf of Kristen Eide-Tollefson
To: Cooley, Nathan (MPCA)
Subject: Re: GHG ruling
Date: Friday, August 10, 2012 9:59:07 AM
Attachments: image001.png

Our street address is 28477 N. Lake Ave. Way (P.O. Box 129) Frontenac, MN 55026
Thank you Nathan.

On Fri, Aug 10, 2012 at 9:31 AM, Cooley, Nathan (MPCA) <nathan.cooley@state.mn.us> wrote:

> Thank you for your thoughtful request. Please supply a valid street mailing address to make your request valid. Thanks
>
> ***Nathan Brooks Cooley***
>
> Rules Coordinator
>
> 651-757-2290 v
>
> 651-297-8676 x
>
> Minnesota Pollution Control Agency
>
> ---
>
> **From:** healingsystems69@gmail.com [mailto:healingsystems69@gmail.com] **On Behalf Of** Kristen Eide-Tollefson
> **Sent:** Friday, August 10, 2012 9:00 AM
> **To:** Cooley, Nathan (MPCA); Conti, Barbara J (MPCA)
> **Subject:** Re: GHG ruling
>
> **Request that hearing be held on Green House Gas rulemaking**
>
> Dear Mr. Cooley and Ms. Conti:
>
> Ref: ***"Dual Notice: Notice of Intent to Adopt Rules Without a Public Hearing Unless 25 or More Persons Request a Hearing, and Notice of Hearing if 25 or More Requests for Hearing are Received Proposed Amendment to Agency Rules Implementing Permanent Federal Air Permit Threshold Regulatory Relief for Greenhouse Gases (GHGs) …"***
> (http://www.pca.state.mn.us/index.php/view-document.html?gid=18059)
>
> I request that the scheduled August 30th hearing be held on the proposed Permanent Green House Gas (GHG) Rules, to address temporary proposed rules.

Thresholds are insufficient to challenge expanding GHG emissions in Minnesota. The MPCA has the authority to adopt rules setting a higher standard than EPA has required, and this is clearly a matter in which that authority should be exercised. Additional information should be gathered and public hearing held to evaluate and address feasibility of adopting a lower threshold.

The current plan to follow EPA's deferral, rather than to actively prepare Minnesota's biomass industry for these changes may not benefit the state's industry in the long run. Particularly given the increasing air alert pattern for Mn -- responsible, proactive investigation and active support of reduced GHG emissions, through incorporation into the rule -- will benefit all parties in the long term.

Thank you for your excellent ongoing notification of citizens, as to the daily health of our air.

Yours very truly,

Kristen Eide-Tollefson
Frontenac, MN 55026
1-651-345-5488

From:	Carol A. Overland
To:	Cooley, Nathan (MPCA); Conti, Barbara J (MPCA)
Subject:	Re: Hearing on Greenhouse Gas
Date:	Friday, August 10, 2012 12:09:25 PM

Amendment to comply with the Comment rules:

> Subp. 2. Contents of written comments.
>
> A person who submits comments under subpart 1 shall include in the comments the following:
>
> A. a statement of the person's interest in the permit application or the draft permit;
>
> B. a statement of the action the person wishes the agency to take, including specific references to sections of the draft permit that the person believes should be changed; and
>
> C. the reasons supporting the person's position, stated with sufficient specificity as to allow the commissioner to investigate the merits of the person's positions.

My interest in this proceeding is as a person who breathes and lives on the planet, thus effected by Greenhouse Gas Rules.

I request that the MPCA take testimony from the public in a formal hearing and take into consideration information presented by the public, and use that record to support a more stringent limit on greenhouse gas emissions.

The public realm has sufficient information to support a more stringent limitation on greenhouse gas emissions, and it is the MPCA's job to "control" pollution and it is the agency that has the expertise to determine what specific limit is appropriate. The public, at the hearing, will have much more information and specific recommendations for the MPCA. Those knowledgeable, concerned, and expert in this area must be allowed to speak and present their testimony at a public hearing.

Carol A. Overland
Attorney at Law

On 8/10/2012 12:01 PM, Carol A. Overland wrote:

> Mr. Cooley and Ms. Conti -
>
> The Greenhouse Gas rules are crucial, and not nearly as limiting as necessary.
>
> At this time I request that the MPCA hold a public hearing as stated in the Comment notice. The Notice stated this meeting would be held in the boardroom, of its St. Paul office at 520 Lafayette Road, St. Paul,

Minnesota 55155, starting at 2:00 p.m. on Thursday, August 30, 2012.

The timing of this meeting is problematic, as few people can attend a meeting at 2 p.m. in the afternoon. The meeting should be scheduled for the evening, or another session should be held in the evening. If it is held at 2 p.m., the only ones who likely could attend are paid staff members of organizations and people who are retired. I request a hearing at a time that would allow for working people to attend.

Carol A. Overland
Attorney at Law

--

"Our lives begin to end the day we become silent
about the things that matter." Dr. Martin Luther King, Jr.

Carol A. Overland
Attorney at Law
Legalectric - Overland Law Office
1110 West Avenue
Red Wing, MN 55066

612-227-8638

overland@legalectric.org

www.legalectric.org
www.nocapx2020.info

From: Suzanne
To: Cooley, Nathan (MPCA)
Subject: Re: Hearing Request on Green House Gas rulemaking
Date: Friday, August 10, 2012 5:26:36 PM
Attachments: image001.png

I apologize Mr. Cooley. Address below.
I am pleased that the request quota for the hearing has been met!

Suzanne Rohlfing
2310 15th Ave NW
Rochester, MN 55901

Thank you once again.

Suzanne

-----Original Message-----
From: Cooley, Nathan (MPCA) (MPCA) <nathan.cooley@state.mn.us>
To: Suzanne <caraway57@aol.com>
Sent: Fri, Aug 10, 2012 3:17 pm
Subject: RE: Hearing Request on Green House Gas rulemaking

Please provide a mailing address to comply with the notice requirements. It appears that we have enough hearing requests to proceed to hearing.

Nathan Brooks Cooley
Rules Coordinator
651-757-2290 v
651-297-8676 x
Minnesota Pollution Control Agency

From: Suzanne [mailto:caraway57@aol.com]
Sent: Friday, August 10, 2012 2:13 PM
To: Cooley, Nathan (MPCA); Conti, Barbara J (MPCA)
Subject: Hearing Request on Green House Gas rulemaking

Dear. Ms. Conto and Mr. Cooley,

It is with urgent concern that I request the scheduled Hearing on the proposed Permanent Green House Gas Rules be held on August 30th.

After this summer, and thousands of record breaking temperatures, it would seem apparent that erring on the side of more conservative CO2-e emission tolerance is needed. I therefore oppose the adopted temporary 2011 rules, and ask for a more aggressive agenda with a lower threshold for CO2 emmisions than that required by the EPA.

Please advocate for and protect us.

Respectfully submitted,

Suzanne Rohlfing
Rochester, MN

From: Jim Lovestar
To: Cooley, Nathan (MPCA)
Subject: Re: Public hearing
Date: Friday, August 10, 2012 12:24:50 PM

Mr. Cooley,

My mistake.

I live at 2629 Upton Ave N. Mpls, MN 55411

Been here twenty years.

Jim Lovestar
612-588-8984
Car=burn gas; Bike=burn fat--Two legs, two wheels: Let's roll

The shortest answer is doing.
 -- Lord Herbert

The life you lead is the lesson you teach--source unknown

On Aug 10, 2012, at 10:32 AM, Cooley, Nathan (MPCA) wrote:

Mr. Lovestar,

Thank you for your thoughtful request. Please provide a valid street mailing address to ensure the validity of your request (per instructions in the notice). Thanks

Nathan Brooks Cooley
Rules Coordinator
651-757-2290 v
651-297-8676 x

-----Original Message-----
From: Conti, Barbara J (MPCA)
Sent: Thursday, August 09, 2012 8:01 AM
To: Cooley, Nathan (MPCA)
Subject: FW: Public hearing

-----Original Message-----
From: Jim Lovestar [mailto:jimbo@consciousbody.info]
Sent: Wednesday, August 08, 2012 5:07 PM
To: Conti, Barbara J (MPCA)
Subject: Public hearing

Ms. Conti,

I know you are busy. I'll be brief.
I am writing to request a public hearing since I oppose the entire set of rules. I request a thorough and innovative GHG ruling.
I further request that the public
hearing provide the framework for the State of Minnesota to draft our own rule making to remove the "tailoring" and include stricter

requirements for the reduction of GHG emissions throughout our beautiful State and, through funds generated and/or made available by emission fees from GHG sources. To conclude, please work so that this rule making be written to fully address and resolve the true cost/impact of GHG emissions to thoroughly educate the public and raise environmental consciousness.

Jim Lovestar
612-588-8984
Fear is not a place to stay, but a short bridge to cross.--Kevin Elzia

From:	Lori Andresen
To:	Cooley, Nathan (MPCA)
Subject:	RE: Request for a hearing to be held on Green House Gas rulemaking
Date:	Friday, August 10, 2012 4:40:37 PM
Attachments:	image001.png

55812

From: Cooley, Nathan (MPCA) [mailto:nathan.cooley@state.mn.us]
Sent: Friday, August 10, 2012 3:11 PM
To: Lori Andresen
Subject: RE: Request for a hearing to be held on Green House Gas rulemaking

Please provide a zip code for your mailing address. Thanks

Nathan Brooks Cooley
Rules Coordinator
651-757-2290 v
651-297-8676 x
Minnesota Pollution Control Agency

From: Lori Andresen [mailto:andres01@charter.net]
Sent: Friday, August 10, 2012 2:33 PM
To: Cooley, Nathan (MPCA); Conti, Barbara J (MPCA)
Subject: Request for a hearing to be held on Green House Gas rulemaking

RE: Request for a hearing to be held on Green House Gas rulemaking

To: Nathan Cooley

Barbara Conti
Minnesota Pollution Control Agency
520 Lafayette Rd. N.
St. Paul, MN 55155-4194

Date: August 10, 2012

I am requesting that the scheduled August 30th hearing be held on the proposed Permanent Green House Gas (GHG) Rules.

I oppose the entire set of rules as proposed and as adopted temporarily in 2011.

The proposed amendment to set the threshold for requiring an Environmental Assessment Worksheet (EAW) at 100,000 metric tons of carbon dioxide is too high to capture the majority of new polluters in the state.

While the proposed amendment may be in accord with the Federal rule, changing the

threshold to 100,000 tons a year will not be adequate to reduce green house gas emissions in Minnesota.

The MPCA has the authority and obligation to adopt rules setting a higher standard than Federal rules in order to protect Minnesota - and it's people. A much lower threshold for CO2 emissions should be incorporated.

As a resident of Northeastern Minnesota, in less than a year my family has been in the evacuation zone of one of the largest wildfires in our history (a fire preceded by record droughts) and in the path of a record flood - see references below.

The Minnesota Department of Natural Resources (MDNR) is planning on opening up a huge sulfide mining district in the Arrowhead of Minnesota, destroying thousands upon thousands of acres of CO2 sequestering forests, wetlands and bogs.

Climate change is here, the time for our government and its agencies to respond to this threat is *now*.

Sincerely,

Lori Andresen

3025 E Superior St

Duluth, Minnesota

218-340-2451

http://minnesota.publicradio.org/display/web/2012/08/06/disaster/wildfire-management/

Dry conditions prompt change to U.S. Forest Service fire management policy

by Jon Collins, Minnesota Public Radio
August 6, 2012

ST. PAUL, Minn. — The U.S. Forest Service has issued a directive to urge fire managers to move more quickly to extinguish wildfires this season. The agency's usual policy is to let many small fires burn themselves out.

Kris Reichenbach, public affairs officer for Superior National Forest, said the shift in the agency's approach is an attempt to keep firefighting resources free in case larger fires erupt.

"We're probably going to be more conservative and are more likely to move to active suppression when we have a fire start," Reichenbach told MPR News on Monday. "And the

whole intent there is to make sure that where we have choices, we can keep our fire management resources available to respond to nationwide priorities."

The forest service will temporarily back off from activities like fuel reduction or habitat restoration, Reichenbach said.

Some residents thought the forest service should have moved more quickly to put out the Pagami Creek wildfire last year. It blazed across almost 90,000 acres in northern Minnesota and cost about $23 million to suppress, according to the Associated Press. But Reichenbach said Pagami was just one of many wildfires that the forest service found difficult to control last year due to lack of resources.

"Our fire managers are seeing an intensity and a rapid rate of spread, which is basically a result of the weather conditions and the drying," Reichenbach said. "Across the board, they're seeing some more extreme conditions."

Reichenbach said the agency will reevaluate the new directive as weather conditions change.

http://www.startribune.com/local/160198125.html?refer=y

Duluth eyes rebuilding for a wetter climate

- Article by: BILL McAULIFFE , Star Tribune
- Updated: June 25, 2012 - 5:59 AM

City may be one of the first to design for big downpours.

One of the biggest tasks facing Duluth in the aftermath of last week's historic flash flooding will be repairing the city's 400-mile storm-water removal system.

The northern Minnesota city's network of sewers, culverts, ditches and basins, in some places more than 100 years old, suffered "extensive damage all over the city," said Eric Shaffer, Duluth's chief engineer of utilities.

But building and rebuilding a sewer system these days means making an educated and possibly expensive guess on a changing climate. Many communities are studying what steps they might take to accommodate increasing precipitation, but for Duluth, it will be a full-immersion process.

"Duluth is maybe in the first wave of cities to adapt to climate change," said University of Minnesota Extension climatologist Mark Seeley.

Climate scientists say increasing precipitation, particularly from intense thunderstorms, is a symptom of ongoing climate warming, because warm air holds more water vapor than cooler air.

The Upper Midwest saw a 31 percent increase in "intense" rainfalls -- the statistical 1 percent events -- from 1958 to 2007, over previous decades, according to the National Climatic Data Center. Last Tuesday and Wednesday's Duluth rainfall, measuring from 7 to more than 10 inches across the city, was in some places nearly double what's regarded as Duluth's 1 percent-

chance rainfall. That made it "next to impossible to plan for," Shaffer said.

"An event of this magnitude in 24 hours cannot be handled no matter what system we design," he said.

Duluth's deluge came in the same one-week period in which Cannon Falls, in southern Minnesota, received 8.83 inches (on June 14) and 3.31 (on Monday). The 8.83 was the most ever recorded by a National Weather Service observer on a single June day in Minnesota. (The Duluth area rains fell overnight, thus on two calendar dates.)

But it's the smaller, increasingly frequent downpours that cities now need to plan for, many climatologists and community leaders say. In Minnesota, the frequency of 2-inch rainfalls doubled across the state from 1991 to 2010 over the previous long-term rate, even in the north, where cooler weather generally tempers severe storms, Seeley said.

How big is big enough?

The task facing Duluth, with its combination of steep hills, clay-over-rock geology, and the need for an immediate fix -- is "daunting," said Jesse Schomberg, a coastal communities educator for Minnesota Sea Grant, a research and information enterprise funded by the National Oceanic and Atmospheric Administration (NOAA) and the University of Minnesota.

"The big question is: Do you build it the same way, or build it to somehow manage for bigger events, like we seem to be seeing more and more often?" Schomberg said. "But then the question is: How much bigger? That's something we don't really know yet."

In the Twin Cities metro

In the metro area, more than two dozen communities in the Minnehaha Creek Watershed District have embarked on a study, funded in part by NOAA, to brainstorm new stormwater management strategies -- bigger pipes, more absorbent surfaces, underground storage -- in the face of increasing precipitation.

Many of those communities, like Duluth, have wastewater systems designed for 100-year rainfall standards that were established in the Rainfall Frequency Atlas of the United States, published in 1961. An overhaul of those numbers is expected soon. Latham Stack, a consultant working with the Minnehaha Creek project, said expanding storm-water capacity more than two and a half times would not be extreme for most communities.

In the aftermath of last week's storms, Shaffer wasn't ready to say what sort of strategy Duluth might take.

"We would like to make sure, where [structures] have been torn out, that we do put them back large enough to make sure they don't get ripped out again," he said. "We don't have the money to replace them every 25 years."

Bill McAuliffe • 612-673-7646

http://mankatofreepress.com/breakingnews/x1254875809/Duluth-infrastructure-crumbles-under-9-in-rain

June 20, 2012

Duluth infrastructure crumbles under 9 in.-rain

Associated Press

DULUTH —

Residents evacuated their homes and animals escaped from pens at a zoo as floods fed by a steady torrential downpour struck northeastern Minnesota, inundating the city of Duluth, officials said Wednesday.

Police officers helped track down a polar bear that got out of its enclosure overnight at the low-lying Lake Superior Zoo where several animals drowned.

Duluth Mayor Don Ness said he would declare a state of emergency after the deluge of up to 9 inches of rain that he said caused extensive damage to the port city of about 86,000. Ness said the order would start the process to obtain federal aid. Gov. Mark Dayton said he would travel to Duluth on Thursday to discuss how the state can help.

Much of Duluth is spread along a steep rocky hillside overlooking Lake Superior so the water speeds downhill, carrying debris with it, Ness said.

"There are certainly reports of streets being washed out, but the more significant problems are as the water comes over the ridge and starts rushing down the hill, overwhelming our storm systems, overwhelming our culvert system and creating that forward momentum of rushing water," Ness said. "That's where the most significant problems are being felt."

The zoo lies at the foot of the hill, making it particularly vulnerable. Several sheep, goats and a donkey in the barnyard exhibit were killed by the flooding, said Susan Wolniakowski, director of guest services. It also provided an opportunity for Berlin, a female polar bear, to escape.

"Even though it's a large white object, it's pretty nerve racking," police spokesman Jim Hansen said of the chase for Berlin. Zoo officials said she was darted by the zoo's vet and placed in quarantine.

Peter Pruett, the zoo's director of Animal Management, said the "entire staff is devastated" at the loss of the animals.

Wolniakowski said no animals left the zoo grounds and all have been secured.

"I think it's probably been the worst flooding we've ever had at the zoo," Wolniakowski said. The zoo's train depot was completely underwater, she said.

Ness said more rain was expected later Wednesday, and that it may take time for the damage to become fully apparent. He said the volume of rain in a short period puts a tremendous amount of stress on sewer and road systems.

"We're concerned about washouts and sinkholes and they'll likely show themselves in the coming days. ... The water is rushing so hard that we're concerned about the integrity of the roadbeds being washed out," he said.

Several major highways leading into the city were closed because of the flooding and authorities encouraged residents to stay home because of the volume of standing and rushing floods, and the difficulty in spotting hazards under water, such as missing manhole covers.

"It's a mess. There are too many intersections to even list that are closed," Hansen said.

Authorities asked residents of the low-lying Fond du Lac neighborhood to leave their homes because of the rising level of the St. Louis River. Hansen said about a dozen homes were evacuated.

"Fortunately ... it is a relatively small number of households that are being evacuated," Ness said. "Most homes in Duluth are farther up the hill."

The Red Cross opened two shelters for evacuees. The University of Minnesota Duluth campus closed Wednesday but planned to reopen Thursday.

From: Senator John Marty
To: Cooley, Nathan (MPCA)
Subject: Re: request for hearing on Climate Change Rules
Date: Friday, August 10, 2012 11:21:17 PM

Nathan:

My apologies. I should have remembered that. My home address is:

John Marty
2478 Lydia Ave W.
Roseville, MN 55113

if you need it in the same document as my request for the hearing here it is:

Dear Mr Cooley,

I request that the MPCA hold a hearing on the proposed Permanent Greenhouse Gas Rules on August 30.

The federal thresholds are inadequate, given the urgency of the climate change situation, and Minnesota can do better than simply adopt the federal standards. I strongly encourage the MPCA to hold the hearing and then adopt a more meaningful rule.

The minimal efforts to address greenhouse gas emissions being put forth by our generation will be looked at shamefully by future generations that are forced to live with the consequences of our inaction.

Thank you for your attention to this request.

John Marty
2478 Lydia Ave W
Roseville, MN 55113

On 8/10/2012 3:16 PM, Cooley, Nathan (MPCA) wrote:

> Dear Senator Marty:
>
> I appreciate your thoughtful hearing request. The notice requires a valid request to include a mailing address for the person requesting the hearing. Please provide a mailing address. It appears that we have received sufficient requests to require that we hold the scheduled hearing.
>
> Thanks
>
> Nathan Brooks Cooley
> Rules Coordinator
> 651-757-2290 v
> 651-297-8676 x

-----Original Message-----
From: Senator John Marty [mailto:jmarty@apple-pie.org]
Sent: Friday, August 10, 2012 2:18 PM
To: Conti, Barbara J (MPCA)
Cc: Cooley, Nathan (MPCA); Barb Jacobs
Subject: request for hearing on Climate Change Rules

Dear Ms. Conti:

I request that the MPCA hold a hearing on the proposed Permanent Greenhouse Gas Rules on August 30.

The federal thresholds are inadequate, given the urgency of the climate change situation, and Minnesota can do better than simply adopt the federal standards. I strongly encourage the MPCA to hold the hearing and then adopt a more meaningful rule.

The minimal efforts to address greenhouse gas emissions being put forth by our generation will be looked at shamefully by future generations that are forced to live with the consequences of our inaction.

Thank you for your attention to this request.

John Marty
former chair, Senate Environment Committee

From:	Kay Graham
To:	Cooley, Nathan (MPCA)
Subject:	Re: Request for Hearing
Date:	Friday, August 10, 2012 5:00:39 PM
Attachments:	image001.png

Thanks so much for the head-up.

My zip is 55408.

Kay
612-825-3637

From: "Cooley, Nathan (MPCA)" <nathan.cooley@state.mn.us>
To: Kay Graham <kaynygaardgraham@yahoo.com>
Sent: Friday, August 10, 2012 4:38 PM
Subject: RE: Request for Hearing

When convenient, would you please provide your zip code? Thanks

Nathan Brooks Cooley
Rules Coordinator
651-757-2290 v
651-297-8676 x
Minnesota Pollution Control Agency

From: Kay Graham [mailto:kaynygaardgraham@yahoo.com]
Sent: Friday, August 10, 2012 4:27 PM
To: Cooley, Nathan (MPCA)
Subject: Request for Hearing

Request that hearing be held on Green House Gas rulemaking

Dear Mr. Cooley and Ms. Conti:

In reference to your Dual Notice:

1) Notice of Intent to Adopt Rules Without a Public Hearing Unless 25 or More Persons Request a Hearing, and Notice of Hearing if 25 or More Requests for Hearing are Received

2) Proposed Amendment to Agency Rules Implementing Permanent Federal Air Permit Threshold Regulatory Relief for Greenhouse Gases (GHGs) .. (http://www.pca.state.mn.us/index.php/view-document.html?gid=18059)

I request that the scheduled August 30th hearing be held on the proposed Permanent Green House Gas (GHG) Rules.

To clarify: The Temporary Rules that were adopted in 2011 must not be made permanent without more public scrutiny and input. The Federal guidelines are totally inappropriate and unacceptable because they will not accomplish the task for which you say they are intended.

Why, then, should the MPCA agree to implement these rules on a permanent basis?

The MPCA has the authority to adopt rules setting a higher standard than EPA has required. It is clear to me that the MPCA should do its due-diligence, to exercise its authority and incorporate the more appropriate lower threshold for CO2-e emissions.

Additionally, It is TOTALLY irresponsible for the MPCA to promote "biomass-fired or biogenic processes" while seeking to avoid considering the climate-forcing emissions of these processes. Emissions of this sort, and facilities responsible for such emissions, should be
fully incorporated, not exempted, from the Minnesota rule.

Respectfully,
Kay Nygaard Graham
3037 Emerson Ave. S.
Minneapolis, MN,

From: Christie Manning
To: Cooley, Nathan (MPCA)
Subject: Re: Requesting a hearing on GHG rulemaking
Date: Friday, August 10, 2012 11:58:09 AM
Attachments: image001.png

Here is my mailing/street address:

Christie Manning
1764 Hague Avenue
Saint Paul, MN 55104

thanks,
Christie

On Fri, Aug 10, 2012 at 9:32 AM, Cooley, Nathan (MPCA) <nathan.cooley@state.mn.us> wrote:

> Thanks for your thoughtful request. Please supply a mailing street address to make your request valid. Thanks
>
> ***Nathan Brooks Cooley***
>
> Rules Coordinator
>
> 651-757-2290 v
>
> 651-297-8676 x
>
>
>
>
> ---
>
> **From:** Christie Manning [mailto:christie.m.manning@gmail.com]
> **Sent:** Thursday, August 09, 2012 10:28 PM
> **To:** Cooley, Nathan (MPCA); Conti, Barbara J (MPCA)
> **Subject:** Requesting a hearing on GHG rulemaking
>
> Dear Nathan Cooley, Dear Barbara Conti,
>
> I am writing to join other voices from around the state to request a public hearing on the proposed Permanent Green House Gas (GHG) Rules.
>
> I believe proposed threshold for CO2e (carbon dioxide equivalent) of 100,000 tons (two hundred million pounds) per year is far too large.
>
> It is well past time for us to act decisively to cut our GHG emissions. This is an

opportunity for Minnesota to step out ahead, showing ethical, environmental, and forward-thinking economic leadership.

Thank you for your attention to this. I look forward to seeing you at the hearing on August 30.

Sincerely,
Christie Manning

From:	Lori Andresen
To:	Cooley, Nathan (MPCA); Conti, Barbara J (MPCA)
Subject:	Request for a hearing to be held on Green House Gas rulemaking
Date:	Friday, August 10, 2012 2:32:40 PM

RE: Request for a hearing to be held on Green House Gas rulemaking

To: Nathan Cooley

Barbara Conti
Minnesota Pollution Control Agency
520 Lafayette Rd. N.
St. Paul, MN 55155-4194

Date: August 10, 2012

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I oppose the entire set of rules as proposed and as adopted temporarily in 2011.

The proposed amendment to set the threshold for requiring an Environmental Assessment Worksheet (EAW) at 100,000 metric tons of carbon dioxide is too high to capture the majority of new polluters in the state.

While the proposed amendment may be in accord with the Federal rule, changing the threshold to 100,000 tons a year will not be adequate to reduce green house gas emissions in Minnesota.

The MPCA has the authority and obligation to adopt rules setting a higher standard than Federal rules in order to protect Minnesota - and it's people. A much lower threshold for CO2 emissions should be incorporated.

As a resident of Northeastern Minnesota, in less than a year my family has been in the evacuation zone of one of the largest wildfires in our history (a fire preceded by record droughts) and in the path of a record flood - see references below.

The Minnesota Department of Natural Resources (MDNR) is planning on opening up a huge sulfide mining district in the Arrowhead of Minnesota, destroying thousands upon thousands of acres of CO2 sequestering forests, wetlands and bogs.

Climate change is here, the time for our government and its agencies to respond to this threat is *now*.

Sincerely,

Lori Andresen

3025 E Superior St

Duluth, Minnesota

218-340-2451

http://minnesota.publicradio.org/display/web/2012/08/06/disaster/wildfire-management/

Dry conditions prompt change to U.S. Forest Service fire management policy

by Jon Collins, Minnesota Public Radio
August 6, 2012

ST. PAUL, Minn. — The U.S. Forest Service has issued a directive to urge fire managers to move more quickly to extinguish wildfires this season. The agency's usual policy is to let many small fires burn themselves out.

Kris Reichenbach, public affairs officer for Superior National Forest, said the shift in the agency's approach is an attempt to keep firefighting resources free in case larger fires erupt.

"We're probably going to be more conservative and are more likely to move to active suppression when we have a fire start," Reichenbach told MPR News on Monday. "And the whole intent there is to make sure that where we have choices, we can keep our fire management resources available to respond to nationwide priorities."

The forest service will temporarily back off from activities like fuel reduction or habitat restoration, Reichenbach said.

Some residents thought the forest service should have moved more quickly to put out the Pagami Creek wildfire last year. It blazed across almost 90,000 acres in northern Minnesota and cost about $23 million to suppress, according to the Associated Press. But Reichenbach said Pagami was just one of many wildfires that the forest service found difficult to control last year due to lack of resources.

"Our fire managers are seeing an intensity and a rapid rate of spread, which is basically a result of the weather conditions and the drying," Reichenbach said. "Across the board, they're seeing some more extreme conditions."

Reichenbach said the agency will reevaluate the new directive as weather conditions change.

http://www.startribune.com/local/160198125.html?refer=y

Duluth eyes rebuilding for a wetter climate

- Article by: BILL McAULIFFE , Star Tribune
- Updated: June 25, 2012 - 5:59 AM

City may be one of the first to design for big downpours.

One of the biggest tasks facing Duluth in the aftermath of last week's historic flash flooding will be repairing the city's 400-mile storm-water removal system.

The northern Minnesota city's network of sewers, culverts, ditches and basins, in some places more than 100 years old, suffered "extensive damage all over the city," said Eric Shaffer, Duluth's chief engineer of utilities.

But building and rebuilding a sewer system these days means making an educated and possibly expensive guess on a changing climate. Many communities are studying what steps they might take to accommodate increasing precipitation, but for Duluth, it will be a full-immersion process.

"Duluth is maybe in the first wave of cities to adapt to climate change," said University of Minnesota Extension climatologist Mark Seeley.

Climate scientists say increasing precipitation, particularly from intense thunderstorms, is a symptom of ongoing climate warming, because warm air holds more water vapor than cooler air.

The Upper Midwest saw a 31 percent increase in "intense" rainfalls -- the statistical 1 percent events -- from 1958 to 2007, over previous decades, according to the National Climatic Data Center. Last Tuesday and Wednesday's Duluth rainfall, measuring from 7 to more than 10 inches across the city, was in some places nearly double what's regarded as Duluth's 1 percent-chance rainfall. That made it "next to impossible to plan for," Shaffer said.

"An event of this magnitude in 24 hours cannot be handled no matter what system we design," he said.

Duluth's deluge came in the same one-week period in which Cannon Falls, in southern Minnesota, received 8.83 inches (on June 14) and 3.31 (on Monday). The 8.83 was the most ever recorded by a National Weather Service observer on a single June day in Minnesota. (The Duluth area rains fell overnight, thus on two calendar dates.)

But it's the smaller, increasingly frequent downpours that cities now need to plan for, many climatologists and community leaders say. In Minnesota, the frequency of 2-inch rainfalls doubled across the state from 1991 to 2010 over the previous long-term rate, even in the north, where cooler weather generally tempers severe storms, Seeley said.

How big is big enough?

The task facing Duluth, with its combination of steep hills, clay-over-rock geology, and the need for an immediate fix -- is "daunting," said Jesse Schomberg, a coastal communities educator for Minnesota Sea Grant, a research and information enterprise funded by the National Oceanic and Atmospheric Administration (NOAA) and the University of Minnesota.

"The big question is: Do you build it the same way, or build it to somehow manage for bigger events, like we seem to be seeing more and more often?" Schomberg said. "But then the question is: How much bigger? That's something we don't really know yet."

In the Twin Cities metro

In the metro area, more than two dozen communities in the Minnehaha Creek Watershed District have embarked on a study, funded in part by NOAA, to brainstorm new stormwater management strategies -- bigger pipes, more absorbent surfaces, underground storage -- in the face of increasing precipitation.

Many of those communities, like Duluth, have wastewater systems designed for 100-year rainfall standards that were established in the Rainfall Frequency Atlas of the United States, published in 1961. An overhaul of those numbers is expected soon. Latham Stack, a consultant working with the Minnehaha Creek project, said expanding storm-water capacity more than two and a half times would not be extreme for most communities.

In the aftermath of last week's storms, Shaffer wasn't ready to say what sort of strategy Duluth might take.

"We would like to make sure, where [structures] have been torn out, that we do put them back large enough to make sure they don't get ripped out again," he said. "We don't have the money to replace them every 25 years."

Bill McAuliffe • 612-673-7646

http://mankatofreepress.com/breakingnews/x1254875809/Duluth-infrastructure-crumbles-under-9-in-rain

June 20, 2012
Duluth infrastructure crumbles under 9 in.-rain

Associated Press

DULUTH —

Residents evacuated their homes and animals escaped from pens at a zoo as floods fed by a steady torrential downpour struck northeastern Minnesota, inundating the city of Duluth, officials said Wednesday.
Police officers helped track down a polar bear that got out of its enclosure overnight at the low-lying Lake Superior Zoo where several animals drowned.
Duluth Mayor Don Ness said he would declare a state of emergency after the deluge of up to 9 inches of rain that he said caused extensive damage to the port city of about 86,000. Ness said the order would start the process to obtain federal aid. Gov. Mark Dayton said he would travel to Duluth on Thursday to discuss how the state can help.

Much of Duluth is spread along a steep rocky hillside overlooking Lake Superior so the water speeds downhill, carrying debris with it, Ness said.

"There are certainly reports of streets being washed out, but the more significant problems are as the water comes over the ridge and starts rushing down the hill, overwhelming our storm systems, overwhelming our culvert system and creating that forward momentum of rushing water," Ness said. "That's where the most significant problems are being felt."

The zoo lies at the foot of the hill, making it particularly vulnerable. Several sheep, goats and a donkey in the barnyard exhibit were killed by the flooding, said Susan Wolniakowski, director of guest services. It also provided an opportunity for Berlin, a female polar bear, to escape.

"Even though it's a large white object, it's pretty nerve racking," police spokesman Jim Hansen said of the chase for Berlin. Zoo officials said she was darted by the zoo's vet and placed in quarantine.

Peter Pruett, the zoo's director of Animal Management, said the "entire staff is devastated" at the loss of the animals.

Wolniakowski said no animals left the zoo grounds and all have been secured.

"I think it's probably been the worst flooding we've ever had at the zoo," Wolniakowski said. The zoo's train depot was completely underwater, she said.

Ness said more rain was expected later Wednesday, and that it may take time for the damage to become fully apparent. He said the volume of rain in a short period puts a tremendous amount of stress on sewer and road systems.

"We're concerned about washouts and sinkholes and they'll likely show themselves in the coming days. ... The water is rushing so hard that we're concerned about the integrity of the roadbeds being washed out," he said.

Several major highways leading into the city were closed because of the flooding and authorities encouraged residents to stay home because of the volume of standing and rushing floods, and the difficulty in spotting hazards under water, such as missing manhole covers.

"It's a mess. There are too many intersections to even list that are closed," Hansen said.

Authorities asked residents of the low-lying Fond du Lac neighborhood to leave their homes because of the rising level of the St. Louis River. Hansen said about a dozen homes were evacuated.

"Fortunately ... it is a relatively small number of households that are being evacuated," Ness said. "Most homes in Duluth are farther up the hill."

The Red Cross opened two shelters for evacuees. The University of Minnesota Duluth campus closed Wednesday but planned to reopen Thursday.

From:	Senator John Marty
To:	Conti, Barbara J (MPCA)
Cc:	Cooley, Nathan (MPCA); Barb Jacobs
Subject:	request for hearing on Climate Change Rules
Date:	Friday, August 10, 2012 2:18:04 PM

Dear Ms. Conti:

I request that the MPCA hold a hearing on the proposed Permanent Greenhouse Gas Rules on August 30.

The federal thresholds are inadequate, given the urgency of the climate change situation, and Minnesota can do better than simply adopt the federal standards. I strongly encourage the MPCA to hold the hearing and then adopt a more meaningful rule.

The minimal efforts to address greenhouse gas emissions being put forth by our generation will be looked at shamefully by future generations that are forced to live with the consequences of our inaction.

Thank you for your attention to this request.

John Marty
former chair, Senate Environment Committee

From:	Mimi Jennings
To:	Conti, Barbara J (MPCA); Cooley, Nathan (MPCA)
Subject:	Request for hearing on Green House Gas rulemaking
Date:	Friday, August 10, 2012 5:51:57 PM

Dear Mr. Cooley and Ms. Conti:

In reference to (http://www.pca.state.mn.us/index.php/view-document.html?gid=18059):
"Dual Notice: Notice of Intent to Adopt Rules Without a Public Hearing Unless 25 or More Persons Request a Hearing, and Notice of Hearing if 25 or More Requests for Hearing are Received," and:
"Proposed Amendment to Agency Rules Implementing Permanent Federal Air Permit Threshold Regulatory Relief for Greenhouse Gases (GHGs) ..."

I hereby request that the scheduled August 30th hearing be held on the proposed Permanent Green House Gas (GHG) Rules. I wish to oppose all rules adopted temporarily in 2011, which, while they may be consistent with the (sham) Federal rule, have too a high threshold, 100 thousand tons of CO2 per year, and will not cut back CO2 emissions in Minnesota at all.

The SONAR for the 2011 EAW GHG rollover states: *"it is apparent that in any given year there are not likely to be more than a handful of new or expanded sources that would exceed the proposed 100,000 ton threshold."* The MPCA has the authority to adopt rules setting a higher standard than EPA has required. Clearly, in our case, a much lower threshold for CO2-e emissions should be adopted.

In addition, the MPCA has also stated: *"The MPCA is aware of EPA's plan to propose and finalize rules to defer for three years the permitting of greenhouse gas emissions from biomass-fired or biogenic processes. We do not know how this decision will affect Minnesota's permitting program until EPA provides more details on how they will accomplish the deferral. We will continue to work to ensure that Minnesota's permitting rules conform with the EPA's permitting rules and do not unduly affect biomass-fired or other biogenic processes."* It is irresponsible to promote "biomass-fired or biogenic processes" all the while refusing to consider the notoriously high emissions of these processes. Facilities responsible for such emissions shouldn't be exempt from Minnesota rules.

Sincerely,

MimiJennings

From:	Brian Nowak
To:	Cooley, Nathan (MPCA)
Subject:	Request for Hearing on Greenhouse Gas Rulemaking
Date:	Friday, August 10, 2012 11:58:24 AM

---

10 August 2012

Dear Mr. Cooley and Ms. Conti:

Re: Request that a hearing be held on Green House Gas rulemaking

Ref: http://www.pca.state.mn.us/index.php/view-document.html?gid=18059

I request that the scheduled August 30th hearing be held on the proposed Permanent Green House Gas (GHG) Rules.

I question the entire set of rules as proposed and as adopted temporarily in 2011.

The proposed rules have such a high threshold - 100 thousand tons/year CO2-e - that they will be seriously ineffective in curtailing GHG emissions in Minnesota.

The MPCA has the authority to adopt rules setting a higher standard than EPA has required. It strongly appears that authority should be exercised for a much lower threshold for CO2-e emissions.

Yours very truly,

K.Brian Nowak
1735 Perkins Lane
Maple Plain, MN. 55359

From:	Kay Graham
To:	Cooley, Nathan (MPCA)
Subject:	Request for Hearing
Date:	Friday, August 10, 2012 4:27:13 PM
Attachments:	Request for Hearing.doc

Request that hearing be held on Green House Gas rulemaking

Dear Mr. Cooley and Ms. Conti:

In reference to your Dual Notice:

1) Notice of Intent to Adopt Rules Without a Public Hearing Unless 25 or More Persons Request a Hearing, and Notice of Hearing if 25 or More Requests for Hearing are Received

2) Proposed Amendment to Agency Rules Implementing Permanent Federal Air Permit Threshold Regulatory Relief for Greenhouse Gases (GHGs) .. (http://www.pca.state.mn.us/index.php/view-document.html?gid=18059)

I request that the scheduled August 30th hearing be held on the proposed Permanent Green House Gas (GHG) Rules.

To clarify: The Temporary Rules that were adopted in 2011 must not be made permanent without more public scrutiny and input. The Federal guidelines are totally inappropriate and unacceptable because they will not accomplish the task for which you say they are intended. Why, then, should the MPCA agree to implement these rules on a permanent basis?

The MPCA has the authority to adopt rules setting a higher standard than EPA has required. It is clear to me that the MPCA should do its due-diligence, to exercise its authority and incorporate the more appropriate lower threshold for CO2-e emissions.

Additionally, It is TOTALLY irresponsible for the MPCA to promote "biomass-fired or biogenic processes" while seeking to avoid considering the climate-forcing emissions of these processes. Emissions of this sort, and facilities responsible for such emissions, should be
fully incorporated, not exempted, from the Minnesota rule.

Respectfully,
Kay Nygaard Graham
3037 Emerson Ave. S.
Minneapolis, MN,

From:	sarah mccarthy
To:	Cooley, Nathan (MPCA); Conti, Barbara J (MPCA)
Cc:	sarah mccarthy
Subject:	request for hearing--proposed amendment for permanent GHG emission rules...
Date:	Friday, August 10, 2012 11:51:12 AM

Dear Mr. Cooley and Ms. Conti:

Ref:

"Dual Notice: Notice of Intent to Adopt Rules Without a Public Hearing Unless 25 or More Persons Request a Hearing, and Notice of Hearing if 25 or More Requests for Hearing are Received
Proposed Amendment to Agency Rules Implementing Permanent Federal Air Permit Threshold Regulatory Relief for Greenhouse Gases (GHGs) ..." (http://www.pca.state.mn.us/index.php/view-document.html?gid=18059)

I request that the scheduled August 30th hearing be held on the proposed Permanent Green House Gas (GHG) Rules.

I oppose the entire set of rules as proposed and as adopted temporarily in 2011.

The essence of the issue is that the proposed rules, while they may be consistent with the Federal rule, have such a high threshold--essentially, 100 thousand tons/year CO2-e--that they will be ineffective in curtailing GHG emissions in Minnesota.

Elsewhere--the SONAR for the 2011 EAW GHG rollover--is stated: "it is apparent that in any given year there are not likely to be more than a handful of new or expanded sources that would exceed the proposed 100,000 ton threshold."

The MPCA has the authority to adopt rules setting a higher standard than EPA has required, and this is clearly a matter in which that authority should be exercised. A much lower threshold for CO2-e emissions should be incorporated.

Further, the MPCA has stated: "The MPCA is aware of EPA's plan to propose and finalize rules to defer for three years the permitting of greenhouse gas emissions from biomass-fired or biogenic processes. We do not know how this decision will affect Minnesota's permitting program until EPA provides more details on how they will accomplish the deferral. We will continue to work to ensure that Minnesota's permitting rules conform with the EPA's permitting rules and do not unduly affect biomass-fired or other biogenic processes." It is irresponsible to promote "biomass-fired or biogenic processes" while seeking to avoid considering the--known to be very high--climate-forcing emissions of these processes. Emissions of this sort, and facilities responsible for such emissions, should be fully incorporated, not exempted, from the Minnesota rule.

Yours very, truly,

Sarah B. McCarthy

From:	sarah mccarthy
To:	Cooley, Nathan (MPCA); Conti, Barbara J (MPCA)
Cc:	sarah mccarthy
Subject:	request for hearing--proposed amendment for permanent GHG emission rules...
Date:	Friday, August 10, 2012 2:03:31 PM

Dear Mr. Cooley and Ms. Conti:

Ref:

"Dual Notice: Notice of Intent to Adopt Rules Without a Public Hearing Unless 25 or More Persons Request a Hearing, and Notice of Hearing if 25 or More Requests for Hearing are Received
Proposed Amendment to Agency Rules Implementing Permanent Federal Air Permit Threshold Regulatory Relief for Greenhouse Gases (GHGs) ..." (http://www.pca.state.mn.us/index.php/view-document.html?gid=18059)

I request that the scheduled August 30th hearing be held on the proposed Permanent Green House Gas (GHG) Rules.

I oppose the entire set of rules as proposed and as adopted temporarily in 2011.

The essence of the issue is that the proposed rules, while they may be consistent with the Federal rule, have such a high threshold--essentially, 100 thousand tons/year CO2-e--that they will be ineffective in curtailing GHG emissions in Minnesota.

Elsewhere--the SONAR for the 2011 EAW GHG rollover--is stated: "it is apparent that in any given year there are not likely to be more than a handful of new or expanded sources that would exceed the proposed 100,000 ton threshold."

The MPCA has the authority to adopt rules setting a higher standard than EPA has required, and this is clearly a matter in which that authority should be exercised. A much lower threshold for CO2-e emissions should be incorporated.

Further, the MPCA has stated: "The MPCA is aware of EPA's plan to propose and finalize rules to defer for three years the permitting of greenhouse gas emissions from biomass-fired or biogenic processes. We do not know how this decision will affect Minnesota's permitting program until EPA provides more details on how they will accomplish the deferral. We will continue to work to ensure that Minnesota's permitting rules conform with the EPA's permitting rules and do not unduly affect biomass-fired or other biogenic processes." It is irresponsible to promote "biomass-fired or biogenic processes" while seeking to avoid considering the--known to be very high--climate-forcing emissions of these processes. Emissions of this sort, and facilities responsible for such emissions, should be fully incorporated, not exempted, from the Minnesota rule.

Yours very truly,

Sarah B. McCarthy
3501 Cedar Avenue South, Unit 2
Minneapolis, MN 55407

From:	Brooke Dierkhising
To:	Cooley, Nathan (MPCA)
Subject:	Request that a hearing be held on Green House gas rulemaking
Date:	Friday, August 10, 2012 12:41:18 PM

Dear Mr. Cooley:

Ref:

"Dual Notice: Notice of Intent to Adopt Rules Without a Public Hearing Unless 25 or More Persons Request a Hearing, and Notice of Hearing if 25 or More Requests for Hearing are Received
Proposed Amendment to Agency Rules Implementing Permanent Federal Air Permit Threshold Regulatory Relief for Greenhouse Gases (GHGs) ..." (http://www.pca.state.mn.us/index.php/view-document.html?gid=18059)

I request that the scheduled August 30th hearing be held on the proposed Permanent Green House Gas (GHG) Rules.

I oppose the entire set of rules as proposed and as adopted temporarily in 2011.

The essence of the issue is that the proposed rules, while they may be consistent with the Federal rule, have such a high threshold--essentially, 100 thousand tons/year CO2-e--that they will be ineffective in curtailing GHG emissions in Minnesota.

Elsewhere--the SONAR for the 2011 EAW GHG rollover--is stated: *"it is apparent that in any given year there are not likely to be more than a handful of new or expanded sources that would exceed the proposed 100,000 ton threshold."*

The MPCA has the authority to adopt rules setting a higher standard than EPA has required, and this is clearly a matter in which that authority should be exercised. A much lower threshold for CO2-e emissions should be incorporated.

Further, the MPCA has stated: *"The MPCA is aware of EPA's plan to propose and finalize rules to defer for three years the permitting of greenhouse gas emissions from biomass-fired or biogenic processes. We do not know how this decision will affect Minnesota's permitting program until EPA provides more details on how they will accomplish the deferral. We will continue to work to ensure that Minnesota's permitting rules conform with the EPA's permitting rules and do not unduly affect biomass-fired or other biogenic processes."* It is irresponsible to promote "biomass-fired or biogenic processes" while seeking to avoid considering the--known to be very high--climate-forcing emissions of these processes. Emissions of this sort, and facilities responsible for such emissions, should be fully incorporated, not exempted, from the Minnesota rule.

Sincerely,

Brooke Dierkhising
3536 32nd Ave S
Minneapolis, MN 55406

"a backyard garden is more than just the basis of healthy living; it is one of the most important social movements of our age and the key to the preservation of our natural world." onemilliongardens.com

From:	Scott Travis
To:	Cooley, Nathan (MPCA); Conti, Barbara J (MPCA)
Subject:	Request that hearing be held on Green House Gas rulemaking
Date:	Friday, August 10, 2012 12:28:01 PM

Dear Mr. Cooley and Ms. Conti:

Ref:

"Dual Notice: Notice of Intent to Adopt Rules Without a Public Hearing Unless 25 or More Persons Request a Hearing, and Notice of Hearing if 25 or More Requests for Hearing are Received
Proposed Amendment to Agency Rules Implementing Permanent Federal Air Permit Threshold Regulatory Relief for Greenhouse Gases (GHGs) ..." (http://www.pca.state.mn.us/index.php/view-document.html?gid=18059)

I request that the scheduled August 30th hearing be held on the proposed Permanent Green House Gas (GHG) Rules.

I oppose the entire set of rules as proposed and as adopted temporarily in 2011.

The essence of the issue is that the proposed rules, while they may be consistent with the Federal rule, have such a high threshold--essentially, 100 thousand tons/year CO2-e--that they will be ineffective in curtailing GHG emissions in Minnesota.

Elsewhere--the SONAR for the 2011 EAW GHG rollover--is stated: *"it is apparent that in any given year there are not likely to be more than a handful of new or expanded sources that would exceed the proposed 100,000 ton threshold."*

The MPCA has the authority to adopt rules setting a higher standard than EPA has required, and this is clearly a matter in which that authority should be exercised. A much lower threshold for CO2-e emissions should be incorporated.

Further, the MPCA has stated: *"The MPCA is aware of EPA's plan to propose and finalize rules to defer for three years the permitting of greenhouse gas emissions from biomass-fired or biogenic processes. We do not know how this decision will affect Minnesota's permitting program until EPA provides more details on how they will accomplish the deferral. We will continue to work to ensure that Minnesota's permitting rules conform with the EPA's permitting rules and do not unduly affect biomass-fired or other biogenic processes."* It is irresponsible to promote "biomass-fired or biogenic processes" while seeking to avoid considering the--known to be very high--climate-forcing emissions of these processes. Emissions of this sort, and facilities responsible for such emissions, should be fully incorporated, not exempted, from the Minnesota rule.

Thank you for your service and consideration.

Truly,

Scott Travis

3852 27th Ave S
Mpls MN 55406

From:	Alan Muller
To:	Cooley, Nathan (MPCA); Conti, Barbara J (MPCA)
Subject:	Request that hearing be held on Green House Gas rulemaking
Date:	Thursday, August 09, 2012 6:33:15 PM

Dear Mr. Cooley and Ms. Conti:

Ref:

"Dual Notice: Notice of Intent to Adopt Rules Without a Public Hearing Unless 25 or More Persons Request a Hearing, and Notice of Hearing if 25 or More Requests for Hearing are Received
Proposed Amendment to Agency Rules Implementing Permanent Federal Air Permit Threshold Regulatory Relief for Greenhouse Gases (GHGs) …" (http://www.pca.state.mn.us/index.php/view-document.html?gid=18059)

I request that the scheduled August 30 th hearing be held on the proposed Permanent Green House Gas (GHG) Rules.

I oppose the entire set of rules as proposed and as adopted temporarily in 2011.

The essence of the issue is that the proposed rules, while they may be consistent with the Federal rule, have such a high threshold--essentially, 100 thousand tons/year CO2-e--that they will be ineffective in curtailing GHG emissions in Minnesota.

Elsewhere--the SONAR for the 2011 EAW GHG rollover--is stated: ***"it is apparent that in any given year there are not likely to be more than a handful of new or expanded sources that would exceed the proposed 100,000 ton threshold."***

The MPCA has the authority to adopt rules setting a higher standard than EPA has required, and this is clearly a matter in which that authority should be exercised. A much lower threshold for CO2-e emissions should be incorporated.

Further, the MPCA has stated: ***"The MPCA is aware of EPA?s plan to propose and finalize rules to defer for three years the permitting of greenhouse gas emissions from biomass-fired or biogenic processes. We do not know how this decision will affect Minnesota?s permitting program until EPA provides more details on how they will accomplish the deferral. We will continue to work to ensure that Minnesota?s permitting rules conform with the EPA?s permitting rules and do not unduly affect biomass-fired or other biogenic processes."*** It is irresponsible to promote "biomass-fired or biogenic processes" while seeking to avoid considering the--known to be very high--climate-forcing emissions of these processes. Emissions of this sort, and facilities responsible for such emissions, should be fully incorporated, not exempted, from the Minnesota rule.

Yours very truly,

Alan Muller
Energy & Environmental Consulting
1110 West Avenue
Red Wing, MN, 55066
302.299.6783
alan@greendel.org

From:	Carla Arneson
To:	Cooley, Nathan (MPCA); Conti, Barbara J (MPCA)
Subject:	Request that hearing be held on Green House Gas rulemaking
Date:	Friday, August 10, 2012 3:24:31 PM

Request that hearing be held on Green House Gas rulemaking

Dear Mr. Cooley and Ms. Conti:

I agree with the request submitted by Alan Muller, which I have copied below. I would add the following to his comments: It is also imperative to consider the effect that sulfide mining projects proposed for northern Minnesota would have when they destroy the wetlands and forests of our state. It is imperative to consider cumulative effects of the failure to meet air emission standards by the mining industry currently in Minnesota when coupled with the additional emissions of proposed sulfide mining projects, including additional coal fired power plant emissions used for their operations.

Yours very truly,
Carla Arneson
P.O. Box 336
Ely, MN. 55731

"Ref:

"Dual Notice: Notice of Intent to Adopt Rules Without a Public Hearing Unless 25 or More Persons Request a Hearing, and Notice of Hearing if 25 or More Requests for Hearing are Received
Proposed Amendment to Agency Rules Implementing Permanent Federal Air Permit Threshold Regulatory Relief for Greenhouse Gases (GHGs) ..." (http://www.pca.state.mn.us/index.php/view-document.html?gid=18059)

I request that the scheduled August 30th hearing be held on the proposed Permanent Green House Gas (GHG) Rules.

I oppose the entire set of rules as proposed and as adopted temporarily in 2011.

The essence of the issue is that the proposed rules, while they may be consistent with the Federal rule, have such a high threshold--essentially, 100 thousand tons/year CO2-e--that they will be ineffective in curtailing GHG emissions in Minnesota.

Elsewhere--the SONAR for the 2011 EAW GHG rollover--is stated: *"it is apparent that in any given year there are not likely to be more than a handful of new or expanded sources that would exceed the proposed 100,000 ton threshold."*

The MPCA has the authority to adopt rules setting a higher standard than EPA has required, and this is clearly a matter in which that authority should be exercised. A much lower threshold for CO2-e emissions should be incorporated.

Further, the MPCA has stated: *"The MPCA is aware of EPA's plan to propose and finalize rules to defer for three years the permitting of greenhouse gas emissions from biomass-fired*

or biogenic processes. We do not know how this decision will affect Minnesota's permitting program until EPA provides more details on how they will accomplish the deferral. We will continue to work to ensure that Minnesota's permitting rules conform with the EPA's permitting rules and do not unduly affect biomass-fired or other biogenic processes." It is irresponsible to promote "biomass-fired or biogenic processes" while seeking to avoid considering the--known to be very high--climate-forcing emissions of these processes. Emissions of this sort, and facilities responsible for such emissions, should be fully incorporated, not exempted, from the Minnesota rule." (Alan Muller comments)

From: sheldon gitis
To: Conti, Barbara J (MPCA); Cooley, Nathan (MPCA)
Subject: request that the scheduled August 30th hearing be held
Date: Friday, August 10, 2012 2:18:50 PM

Dear Mr. Cooley and Ms. Conti:

Ref:

"Dual Notice: Notice of Intent to Adopt Rules Without a Public Hearing Unless 25 or More Persons Request a Hearing, and Notice of
Hearing if 25 or More Requests for Hearing are Received
Proposed Amendment to Agency Rules Implementing Permanent Federal Air
Permit Threshold Regulatory Relief for Greenhouse Gases (GHGs) ..."
(http://www.pca.state.mn.us/index.php/view-document.html?gid=18059)

I request that the scheduled August 30th hearing be held on the
proposed Permanent Green House Gas (GHG) Rules.

Sheldon Gitis
1030 Manvel Street #2
St. Paul, MN 55114

From:	Christie Manning
To:	Cooley, Nathan (MPCA); Conti, Barbara J (MPCA)
Subject:	Requesting a hearing on GHG rulemaking
Date:	Thursday, August 09, 2012 10:27:48 PM

Dear Nathan Cooley, Dear Barbara Conti,

I am writing to join other voices from around the state to request a public hearing on the proposed Permanent Green House Gas (GHG) Rules.

I believe proposed threshold for CO2e (carbon dioxide equivalent) of 100,000 tons (two hundred million pounds) per year is far too large.

It is well past time for us to act decisively to cut our GHG emissions. This is an opportunity for Minnesota to step out ahead, showing ethical, environmental, and forward-thinking economic leadership.

Thank you for your attention to this. I look forward to seeing you at the hearing on August 30.

Sincerely,
Christie Manning

From:	Rosvold, Richard A
To:	Cooley, Nathan (MPCA)
Cc:	Rosvold, Richard A
Subject:	Xcel Energy Comments on GHG Permit Requirements
Date:	Friday, August 10, 2012 1:18:32 PM
Attachments:	Xcel Energy Comments on MN GHG Permit Reqts.pdf

Mr. Cooley,
Attached are Xcel Energy's comments regarding MPCA's Proposed Permanent Rules Relating to Greenhouse Gas Permit Requirements as published in the Minnesota *State Register* on July 9, 2012.

Please contact me if you have questions.

Rick Rosvold
Xcel Energy | Responsible By Nature
Manager, Air Quality
414 Nicollet Mall (MP7) Minneapolis, MN 55401
P: 612.330.7879 **C:** 612.269.9015 **F:** 612.330.6556
E: richard.a.rosvold@xcelenergy.com

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Xcel Energy®
RESPONSIBLE BY NATURE™

414 Nicollet Mall
Minneapolis, MN 55401

1-800-895-4999
xcelenergy.com

August 10, 2012

Mr. Nathan Cooley
Minnesota Pollution Control Agency
520 Lafayette Road
St. Paul, MN 55155

Email: nathan.cooley@state.mn.us

Re: Xcel Energy Comments on MPCA's Proposed Permanent Rules Relating to Greenhouse Gas Permit Requirements

Dear Mr. Cooley:

Xcel Energy Inc. ("Xcel Energy") submits these comments regarding the MPCA's Proposed Permanent Rules Relating to Greenhouse Gas Permit Requirements as published in the Minnesota *State Register* on July 9, 2012.

Xcel Energy is a major U.S. electricity and natural gas company with regulated operations in eight Western and Midwestern states (Colorado, Michigan, Minnesota, New Mexico, North Dakota, South Dakota, Texas and Wisconsin). We provide a comprehensive portfolio of energy-related products and services to 3.4 million electricity customers and 1.9 million natural gas customers. Xcel Energy's generating units are capable of producing over 17,000 megawatts ("MW") of electricity, using a variety of fuel sources including coal, natural gas, oil, nuclear, renewables and hydropower. Our generating units in Minnesota are directly affected by the proposed permanent rules.

Xcel Energy appreciates the opportunity to comment on the proposed rule. We submit the comments below to encourage the Agency to make changes in the final rule to address the issues identified below.

1. Minnesota Rules 7007.1450, subpart 2. Minor amendment applicability additional language does not provide for a long enough compliance period.

The proposed language in question in this section reads, "If a regulatory change results in existing insignificant activities no longer qualifying as such, the owners and operators must submit an application within 30 days of the regulation's effective date to incorporate those emission units or activities into the facility's permit".

MPCA's Statement of Need and Reasonableness indicates that without a due date for the application, the implication is that an amendment is due on the effective date of the regulation that disqualifies the activity from the insignificant activity category. Xcel Energy supports the need for an adequate time period for the affected source to submit a permit application after existing insignificant activities no longer qualify under that classification, but believes that the proposed 30 day period is too short. Xcel Energy proposes that this time period be extended from MPCA's proposed time of 30 days to a more fitting time of either 180 or 365 days. Minnesota Rules 7007.0400, subparts 3- 5 describe several situations when a source is required to submit an application, and allows between 180 days or 365 days for the application to be prepared. The same timeline is appropriate for submitting an application to move an activity out of the insignificant activity category.

In order to comply with the requirement to submit a permit amendment within a short, 30-day application submittal timeline, the facility must identify that a regulatory change exists, determine the proper course of action to respond to the changing regulation, which often requires retaining a consultant, and actually prepare the application. The proposed timeline is overly restrictive, especially where a permittee must obtain help from a consultant.

Requiring the permittee to apply within 30 days of the regulation's effective date will not improve the permitting process. The legislature and the MPCA have been working hard to shorten the time needed to issue permits in Minnesota. In spite of these efforts, the MPCA maintains a large backlog of permit reissuance applications. MPCA currently does not have adequate permitting staff to address the existing work load. A new 30-day application requirement would only add workload for the MPCA with little expectation that the permittee will receive a permit amendment any sooner than the current process. To this end, we do not see what is gained by including such a short application timeframe.

2. The MPCA's Proposed New References to Owners and Operators Should be Deleted.

Xcel Energy notes that MPCA is proposing numerous changes to substitute or add the phrase "owner and operator" in the rule (emphasis added). Xcel Energy would like to clarify how this change would be implemented. Sherburne County Generating Plant Unit 3 is a facility jointly owned by Xcel Energy and the Southern Minnesota Municipal Power Agency. Xcel Energy operates the unit under the terms of an Owner and Operator agreement that specifies that permitting is part of Xcel Energy's authority and responsibility. Under MPCA's existing rules, most obligations are characterized as those of the "owner or operator," "applicant" or the "permittee." The exception is the requirement that a permit application identify the owners and operators of a facility in the content of a permit application. *See* Minn. Rules 7007.0500, subp. 2. This makes sense in the context of the required application content, because MPCA can review the information to see if any additional parties should be named in the permit (thereby becoming permittees) due to the particular circumstances involved with a handful of individual sources.

It is not clear what the MPCA's proposed multiple substitutions or insertions of the term "owner and operators" would require. The general reference to the obligations of the "owner or operator" is a term whose use is longstanding, and is pervasively used in air quality regulation, including the permit program. *See*, for example, Clean Air Act sec. 502(b)(3)(A) (relating to air permit fees); 40 CFR secs. 70.5(a)(1) and 70.9(a) (relating to air permit fees and the obligation to apply for a permit); 40 CFR sec. 71.5(a) (relating to the obligation to apply for a permit if the permit program in the state is administered by EPA). Minnesota's air permit rules also refer to the "owner or operator" in relation to the obligation to apply for a permit. *See* Minn. Rules 7007.0150, subp. 4, 7007.0400, subps. 3-5, and 7007.0450, subp. 3 (relating to Part 70 and state permits in general); as well as 7007.1105 (EMS permits); 7007.1110 (registration permits), and 7007.1140 (capped permits). It is not clear what obligations the MPCA's proposed change from the established language would mean for a co-owner who is not the operator of a facility, or what additional work the operator of a facility must do when administering its obligations under the permit in relation to a co-owner.

Xcel Energy appreciates MPCA's desire to be sure that the rules clearly state that the owner or the operator must apply for a permit for a source subject to permitting requirements, but suggests that the pervasive change proposed by MPCA could create multiple additional ambiguities in how the rules will be applied in an effort to clarify this one point. An alternative approach that addresses MPCA's stated concern without such a comprehensive change to the rules would be desirable. For example, MPCA could make a clear statement at the start of Chapter 7007 that for any source with air emissions that would trigger the requirement for a permit, the "owner or operator" of that source must apply for a permit. This could be placed within the rule part that states the overall permit requirement imposed by Chapter 7007, such as part 7007.0150, and would address the issue identified by MPCA in proposing this change.

Thank you for the opportunity to provide comments on the proposed permanent rules relating to air emissions permit requirements. Please feel free to contact me if you have any questions at 612-269-9015 or richard.a.rosvold@xcelenergy.com.

Sincerely,

Richard A. Rosvold

Richard Rosvold
Manager, Air Quality
Environmental Policy & Services
Xcel Energy Inc.