



January 13, 2025

Docket #: 6630-CE-317

Summer Strand, Chairperson

Kristy Nieto, Commissioner

Marcus Hawkins, Commissioner

Dear Public Service Commission of Wisconsin,

We, the undersigned organizations, are writing to request that the Public Service Commission (PSC) of Wisconsin conduct a full Environmental Impact Statement (EIS) for the Oak Creek Gas Plant and associated LNG storage and gas pipelines. The scale and location of the Oak Creek Gas plant necessitate a full EIS to delineate social, health, and environmental implications to

ensure that the public and decision-makers have a complete assessment of the project for informed decision-making.

**The baseline comparisons in Figure 3-1 of the Environmental Assessment (EA), which contrast the Oak Creek Gas Plant with retiring coal plants at the same facility, are based on flawed assumptions. Emissions should be compared to renewable energy alternatives.** Oak Creek Units 5, 6, 7, and 8 were commissioned between 1959-1968 and were already scheduled to be fully retired or 'shut down' as referenced in the figure. Therefore, the relevant air emissions and their associated health and climate impacts would stop and would not continue until 2058, *i.e.*, the duration of the Oak Creek Gas Plant. Coal plant emissions should not be utilized as a baseline for comparing the greenhouse gas and criteria air pollutant emissions because renewable electricity sources that produce far fewer emissions, like solar and wind energy, are available.

**The health, social, and economic impacts of greenhouse gas emissions should be detailed within the report.** Even though the projected lifetime of this project violates Executive Order 38 and Wisconsin's climate goals as detailed on pg. 31, the assessment fails to discuss the local impacts that these emissions would have. The EA also states that greenhouse gas emissions would be reduced, despite [research](#) referenced on pgs. 31 and 32 which demonstrates that the life cycle emissions of methane gas are equivalent to coal emissions when methane leaks are analyzed.

**According to the [World Health Organization](#), climate change and air pollution collectively are the number one threat to human health.** Despite this, the EA fails to detail the health impacts of criteria air pollutants or climate change. Ground-level ozone is especially harmful to the respiratory system and contributes to asthma, chronic lung disease, and heart disease. [Research](#) shows both short-term and long-term exposures to ozone, at concentrations below current regulatory standards, are associated with increased mortality due to respiratory and cardiovascular disease. Methane gas and fossil fuel electricity sources cause [hundreds of billions of dollars](#) of economic losses from health each year.

**This \$1.205 billion project is located in a non-attainment area for ozone that the EPA will [reclassify as serious on January 16, 2025](#). This project would exacerbate dangerous, health-harming air pollutants in an area that is already in ongoing violation of federal health safeguards.**

**Particulate matter (PM) 2.5 is a toxic air pollutant that causes [damage to every organ system](#).** PM 2.5 exposure increases the risk of poor fetal outcomes, asthma, restricted lung development, autism/ASD, lung and heart disease, cancer, stroke, autoimmune disease, Parkinson's disease, and Alzheimer's. Given the devastating health impacts of PM2.5 pollution, it is essential that extensive PM 2.5 modeling be completed to fully understand the impacts of this proposed project.

**Section 3.1.4, fails to include air modeling results for PM 2.5 and the table does not list whether it exceeds Significant Impacts Levels (SIL). This modeling should include the updated NAAQS annual standard for PM 2.5 which was revised by the EPA in 2024.** Fine particulate matter pollution is dangerous to human health. [Health studies](#) have found that there is [no safe threshold](#) value for fine particulate matter that does not pose a health risk.

The impacts of the proposed gas plant are not limited to a 2-3 mile radius around the plant. When considering the health and environmental justice impacts of this project, the EA only considered the population and demographics of the community closest to the plant. The PSC and the Wisconsin Department of Natural Resources must consider the health and environmental justice impacts of all of the nearby communities that will be impacted by the pollution of this proposed plant, especially [Justice40 communities](#) such as Milwaukee, Cudahy, West Allis, South Milwaukee, Union Grove, and Racine.

**Additionally, the effect this \$1.2 billion proposal could have on utility rates and energy burden is not outlined in the EA.** Energy burden is not experienced by all communities equally. Black, Indigenous, and communities of color in Wisconsin experience disproportionate high energy burden and electricity shut-offs. Large capital investments in fossil fuel infrastructure that carry a high risk of becoming stranded assets need to be deeply scrutinized to protect Wisconsin customers.

**An assessment of the cumulative impacts of the LNG storage facility and pipelines is entirely lacking from the report. Since those facilities would not be needed without the construction of this gas plant, their impacts should be considered within the scope of an EIS.**

**The size and scope of this project justify a full EIS which independently evaluates the environmental, social, economic, and health impacts of this project.** The fact that this project is located on the site of an existing fossil fuel facility does not negate extensive environmental and health impacts. Allowing the Oak Creek Gas Plant to proceed with only an EA or as a minor addition to an existing source as a Type II action sets a dangerous precedent. It fails to adequately evaluate the harm of a large infrastructure project and could potentially encourage utilities to build polluting facilities in close proximity to each other, which results in greater cumulative environmental health and justice burdens for targeted communities.

**In service,**

American Lung Association Wisconsin

Citizens Acting for Rail Safety

Citizen Action of Wisconsin

Democratize Energy Campaign Team of Third Act Wisconsin

Elevate

Environmental Justice Task Force, Racine Interfaith Coalition (RIC)

Faith in Place

Grace Lutheran Church (ELCA)

Healthy Climate Wisconsin

NAACP WI State Conference

Our Future Milwaukee Coalition

Sierra Club Southeast Gateway Group (SEGG)

Sierra Club Wisconsin Chapter

Union of Concerned Scientists

Wisconsin Conservation Voters

Wisconsin EcoLatinos

Wisconsin Environmental Initiative

Wisconsin Environmental Health Network

Wisconsin Green Muslims

Wisconsin League of Women Voters

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