STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
EXECUTIVE OFFICE

GRETCHEN WHITMER
GOVERNOR

PHILLIP D. ROOS
DIRECTOR

May 18, 2026

VIA ELECTRONIC SUBMISSION

Anne M. Vogel, Regional Administrator
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard (R-19J)
Chicago, Illinois 60604-3507

Dear Regional Administrator Vogel:

SUBJECT: Michigan's Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard and Revision to Michigan's State Implementation Plan and Ozone Maintenance Plan for the Southeast Michigan Ozone Nonattainment Area

The Michigan Department of Environment, Great Lakes, and Energy (EGLE) submits Michigan's Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard and Revision to Michigan's State Implementation Plan (SIP) and Ozone Maintenance Plan for the Southeast Michigan Ozone Nonattainment Area (Addendum), as a SIP revision for which EGLE requests approval by the United States Environmental Protection Agency (USEPA).

An opportunity for public comment was provided for the Addendum from March 23, 2026, through April 22, 2026. A public hearing was requested; therefore, an informational session and public hearing were held on April 22, 2026, at 6:00 pm. EGLE received 158 public comments during the public comment period. Four comments received were in support, and 154 comments received were in opposition. Of those comments in opposition, 139 were part of a public comment campaign organized by the Sierra Club. No comments resulted in changes to the SIP document.

An electronic version of the submittal, in PDF format, has been submitted to the USEPA, Region 5 Office, using the State Planning Electronic Collaboration System.

EGLE requests that the USEPA approve these revisions to the Michigan SIP. Questions on this submittal may be directed to Annette Switzer, Director, Air Quality Division, at 517-284-6773; SwitzerA2@Michigan.gov; or EGLE, P.O. Box 30260, Lansing, Michigan 48909-7760; or you may contact me.

Sincerely,

Phillip D. Roos
Director
517-284-6700

Enclosure

cc: Christos Panos, USEPA, Region 5
Sarah Arra, USEPA, Region 5
Eric Svingen, USEPA, Region 5
Aaron B. Keatley, Chief Deputy Director, EGLE
Annette Switzer, EGLE
Dr. Eduardo P. Olaguer, EGLE
Tom Shanley, EGLE
Robert Irvine, EGLE
Erica Shuff, EGLE

Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard and Revision to Michigan's State Implementation Plan and Ozone Maintenance Plan for Southeast Michigan Ozone Nonattainment Area

MICHIGAN DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY

Prepared by:
Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division
P.O. Box 30260
Lansing, Michigan 48909-7760
www.michigan.gov/air

May 2026

Table of Contents

1. Introduction 1
2. Background 1
3. CAA Section 107(d)(3)(E) – Continued Attainment of the NAAQS 3
   3.1 Attainment of the NAAQS 3
   3.2 Quality-assured Data 8
4. CAA Section 182(b) Requirements 8
   4.1. Applicable Requirement Under Section 182(b) 8
   4.2. Reasonably Available Control Technology (RACT) 9
   4.3. Motor Vehicle Inspection and Maintenance 9
   4.4. General Offset Requirement 10
   4.5. Not Applicable Requirements Under Section 182(b) 10
5. CAA Section 172(c)(3) Requirements 11
6. CAA Section 175A Maintenance Plan 12
   6.1. Maintenance for 10 Years 12
7. CAA Section 110 and Part D Requirements 14
   7.1. Conformity Requirements 14
   7.2. Transportation Conformity Requirements and Motor Vehicle Emission Budgets 14
8. Title 40 Code of Federal Regulations, Part 51, Appendix V Requirements 16
   8.1. A Formal Request 16
   8.2. Necessary Legal Authority 17
   8.3. Sufficient Public Notice 17
   8.4. Valid Public Hearing 17
   8.5. Public Comments 18
9. Conclusion 18

List of Tables

Table 1. Southeast Michigan Air Monitoring Sites, Ozone 8-Hour Average, DV, and Completeness for 2020 Through 2025..... 4

Table 2. 2021 through 2025 4th high daily maximum 8-hour average ozone concentrations and the 2023 to 2025 DVs for the Allen Park, Detroit-E.7 Mile, Oak Park, and Port Huron monitors prior to and after EE concurrence. 7

Table 3. Southeast Michigan NOx Emissions Inventory for 2014 and 2019 (tons/ozone season day). 11

Table 4. Southeast Michigan VOC Emissions Inventory for 2014 and 2019 (tons/ozone season day). 11

Table 5. Southeast Michigan Counties NOx Emissions Inventory Projections (tons/ozone season day)..... 13

Table 6. Southeast Michigan Counties VOC Emissions Inventory Projections (tons/ozone season day)..... 14

Table 7. Projected NOx Emission Reductions for Southeast Michigan NAA (tons/summer day). 15

Table 8. Projected VOC Emission Reductions for Southeast Michigan NAA (tons/summer day). 16

Table 9. Motor Vehicle Emissions Budget for Southeast Michigan NAA (tons/summer day). 16

Attachments

Attachment A. Ozone On-road Emissions for the Seven Counties of Southeast Michigan (Livingston, Monroe, Macomb, Oakland, St. Clair, Washtenaw, and Wayne), March 17, 2026
Attachment B. Public Participation Process Documentation
Attachment C. EGLE Calendar Notice - March 23, 2026
Attachment D. AQD Public Notice - March 23, 2026
Attachment E. EGLE Calendar Notice - April 13, 2026
Attachment F. AQD Public Notice - April 13, 2026

1. Introduction

This State Implementation Plan (SIP) submittal is an addendum to Michigan's Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard and Revision to Michigan's State Implementation Plan and Ozone Maintenance Plan for Southeast Michigan Ozone Nonattainment Area (Request for Redesignation). The Request for Redesignation was submitted to the United States Environmental Protection Agency (USEPA) on January 3, 2022. The USEPA acted on the Request for Redesignation on May 19, 2023. However, based on events that have occurred since that time, the Michigan Department of Environment, Great Lakes, and Energy (EGLE) requests the USEPA reconsider the Request for Redesignation for the southeast Michigan nonattainment area (NAA). Below is a list of items included in this submittal to supplement the original Request for Redesignation for the USEPA's consideration.

- Southeast Michigan air monitoring data including ozone 8-hour average, design value (DV), and completeness for 2020 through 2025;
- An update to how Michigan is conforming to the federal Clean Air Act (CAA) Section 182(b) requirements;
- A revision of the maintenance year to 2040;
- An updated on-road inventory for the attainment year (2019) and interim year (2035) using MOVES5;
- An updated Motor Vehicle Emission Budget (MVEBs) for 2035 and 2040.

2. Background

On October 1, 2015, the USEPA promulgated a revised National Ambient Air Quality Standard (NAAQS) for ozone (the 2015 ozone NAAQS). The 2015 ozone NAAQS was revised to an 8-hour standard of 0.070 parts per million (throughout this document, the 2015 ozone NAAQS will be expressed as 70 parts per billion [ppb]).

The USEPA made initial attainment/unclassifiable designations for the 2015 ozone NAAQS for the State of Michigan on November 16, 2017 (82 *Federal Register* [FR] 54232), and made corrections to those designations on October 16, 2018 (83 FR 52157). On June 4, 2018 (83 FR 25776) the USEPA made the final designations and classifications for Michigan, including designating the following seven southeast Michigan counties as marginal nonattainment, effective August 3, 2018: Wayne, Oakland, Macomb, Washtenaw, St. Clair, Livingston, and Monroe (southeast Michigan).

The southeast Michigan counties were designated marginal nonattainment based on air monitoring data from the 2014 through 2016 ozone seasons. Monitors with a 3-year DV for 2014-2016 above 70 ppb were Port Huron (26-147-0005) 73 ppb, New Haven (26-099-0009) 72 ppb, and Detroit East 7 Mile (26-163-0019) 72 ppb.

Section 107(d)(3)(E) of the CAA allows states to request the redesignation of NAAs to attainment provided certain criteria are met. In addition, Title 40 of the Code of Federal Regulations (CFR), Part 51, Requirements for Preparation, Adoption, and Submittal of Implementation Plans, contains requirements for SIP revisions.

On January 3, 2022, EGLE submitted a SIP revision request to the USEPA entitled, Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard and Revision to Michigan's State Implementation Plan and Ozone Maintenance Plan for Southeast Michigan Ozone Nonattainment Area (2022 Redesignation Request). Southeast Michigan failed to attain the 2015 ozone NAAQS by August 3, 2021, and therefore was reclassified to moderate nonattainment on March 1, 2023 (88 FR 6633). On May 19, 2023, (88 FR 32594) the USEPA finalized a clean data determination and redesignated southeast Michigan to attainment of the 2015 ozone NAAQS (88 FR 32584 and 88 FR 32594).

On July 17, 2023, the Sierra Club filed a petition for review of the USEPA's redesignation of southeast Michigan for the 2015 ozone NAAQS. On December 5, 2025, the U.S. Court of Appeals for the Sixth Circuit provided its opinion, which became effective on February 24, 2026, returning the 7-county area of southeast Michigan to "moderate nonattainment" designation.

As stated above, Section 107(d)(3)(E) of the federal CAA allows states to request the redesignation of NAAs to attainment provided certain criteria are met. The State of Michigan, through EGLE, is asking the USEPA to reconsider EGLE's 2022 Redesignation Request and is providing this addendum to demonstrate the area continues to meet the requirements for redesignation, including the ongoing attainment of the 2015 ozone NAAQS. Therefore, EGLE requests the USEPA make a determination that the southeast Michigan area continues to attain the 2015 ozone NAAQS and formally redesignate the area from nonattainment to attainment. EGLE also requests the USEPA approve the CAA Section 175A maintenance plan and emissions inventories included in this document as a revision to the Michigan SIP. In addition, EGLE requests approval of the MVEB for the southeast Michigan counties, included in this document for the duration of the maintenance period.

3. CAA Section 107(d)(3)(E) – Continued Attainment of the NAAQS

3.1 Attainment of the NAAQS

CAA Section 107(d)(3)(E)(i) requires three complete, consecutive calendar years of quality-assured air quality monitoring data to demonstrate attainment. This section addresses monitoring updates extending the data covered in EGLE's previously submitted 2022 Redesignation Request. The data extension in this section addresses the years 2020 through 2025 and meets the consecutive year requirement. Quality assurance is addressed more thoroughly in Subsection 3.2 below.

Ozone monitoring data were collected at the seven ozone monitoring sites within the southeast Michigan NAA for the consecutive years of 2020 through 2025. Table 1 provides the highest four daily maximum 8-hour average values collected in 2020 through 2025 for all seven sites, along with the 2022 through 2025 DVs. These values were obtained during the ozone season, which runs March 1 through October 31 in Michigan each year. Table 1 also lists the percentage of days (% Days) during the ozone season that data was obtained from these sites, demonstrating completeness.

Table 1 includes adjusted values for the Detroit – East 7 Mile site resulting from the Exceptional Event (EE) demonstration submittal that EGLE submitted in January of 2023, which has been concurred on by the USEPA at the time of this submittal. This EE demonstration excluded daily maximum 8-hour average ozone concentrations on June 24 and June 25, 2022, due to demonstrated impacts from wildfire smoke entering the region from Canada. This resulted in a lowering of the 2022 4th high daily maximum 8-hour average utilized to calculate the 2023 and 2024 DVs.

Table 1. Southeast Michigan Air Monitoring Sites, Ozone 8-Hour Average, DV, and Completeness for 2020 Through 2025.

Site Name	Site ID	Year	% Days	1st High	2nd High	3rd High	4th High	2020-2022 DV	2021-2023 DV	2022-2024 DV	2023-2025 DV
Allen Park	26-163-0001	2020	93	73	71	70	70	70	70	71	69
		2021	95	73	71	70	69				
		2022	99	75	72	72	71				
		2023	84	82	79	73	72				
		2024	85	76	75	72	70				
		2025	89	88	67	67	67				
Detroit-E. 7 Mile	26-163-0019	2020	97	76	75	74	73	69	71	71	72
		2021	99	71	71	70	69				
		2022	94	75	71	70	67				
		2023	98	86	85	80	79				
		2024	99	72	71	69	68				
		2025	98	88	73	71	70				
New Haven	26-099-0009	2020	100	78	76	75	74	69	68	69	69
		2021	99	75	74	73	68				
		2022	99	78	70	69	66				
		2023	98	81	80	79	72				
		2024	100	75	74	71	70				
		2025	96	78	69	69	66				
Oak Park	26-125-0001	2020	98	78	77	76	74	69	69	69	71
		2021	98	71	70	69	68				
		2022	99	70	68	67	65				
		2023	95	89	79	78	75				
		2024	100	71	69	69	69				
		2025	98	92	78	71	70				
Port Huron	26-147-0005	2020	100	72	70	70	69				
		2021	99	82	76	73	72				

Site Name	Site ID	Year	% Days	1st High	2nd High	3rd High	4th High	2020-2022 DV	2021-2023 DV	2022-2024 DV	2023-2025 DV
		2022	98	80	77	69	66	69	70	69	71
		2023	98	80	79	75	74				
		2024	96	72	71	70	68				
		2025	99	84	76	73	72				
Warren	26-099-1003	2020	100	77	71	70	70				
		2021	99	71	68	68	67				
		2022	99	73	70	68	68	68	69	69	70
		2023	95	84	79	76	73				
		2024	99	70	68	67	67				
		2025	97	92	74	71	70				
Ypsilanti	26-161-0009	2020	99	74	76	72	72				
		2021	99	70	68	66	66				
		2022	99	71	68	68	67	68	68	68	69
		2023	98	87	79	77	73				
		2024	99	66	64	64	64				
		2025	89	80	73	71	70				

At the time that this document was created, four monitoring sites had DVs above the 70 ppb 2015 ozone NAAQS, however the air quality in southeast Michigan had been impacted by smoke entering the region from wildfires in Canada during 2023 and 2025. Due to this influence, EGLE has completed additional EE demonstrations for southeast Michigan. In February 2026, EGLE submitted to the USEPA an EE demonstration regarding impacts to the Allen Park and Detroit – East 7 Mile monitoring sites. Additionally, another EE demonstration submittal for the Oak Park and Port Huron monitoring sites was developed, and at the time of creation of this document was released for public comment. EGLE will consider and address any comments received regarding the pending EE demonstration and, if appropriate, intends to submit it to the USEPA in April of 2026.

If the USEPA concurs with the EE demonstrations, the data from the Allen Park, Detroit – East 7 Mile, Oak Park, and Port Huron monitoring sites for the impacted days will be excluded from ozone season calculations for southeast Michigan 2023 through 2025

DVs. With the exclusion of the data the DVs will be at or below the 2015 ozone NAAQS and EGLE will continue to pursue redesignation.

Table 2 presents the 2021 through 2025 4th high daily maximum 8-hour average ozone concentrations and the DVs prior to and after EE concurrence by the USEPA. The table highlights and bolds the 4th high daily maximum 8-hour averages that will be changed following concurrence of the associated EE demonstration. Following the USEPA's concurrence of these EE dates, the southeast Michigan NAA will be eligible for redesignation to attainment of the 2015 ozone NAAQS.

Table 2. 2021 through 2025 4th high daily maximum 8-hour average ozone concentrations and the 2023 to 2025 DVs for the Allen Park, Detroit-E 7 Mile, Oak Park, and Port Huron monitors prior to and after EE concurrence.

Site Name	Site ID	2021 4th High	2022 4th High	2023 4th High	2024 4th High	2025 4th High	2023 DV	2024 DV	2025 DV	EE Status
Allen Park	26-163-0001	69	71	72	70	67	70	71	69	Prior to EE concurrence
		69	71	**69**	70	67	69	70	68	After EE concurrence
Detroit-E. 7 Mile	26-163-0019	69	67	79	68	70	71	71	72	Prior to EE concurrence
		69	67	**71**	68	70	69	68	69	After EE concurrence
Oak Park	26-125-0001	68	65	75	69	70	69	69	71	Prior to EE concurrence
		68	65	**73**	69	**69**	68	69	70	After EE concurrence
Port Huron	26-147-0005	72	66	74	68	72	70	69	71	Prior to EE concurrence
		72	66	**71**	68	**69**	69	68	69	After EE concurrence

According to 40 CFR, Part 50, National Primary and Secondary Ambient Air Quality Standards, Appendix I, the requirement for three complete, consecutive calendar years of data is met if the “daily maximum 8-hour average concentrations are available for at least 90 percent, on average, of the days during the designated ozone monitoring season, with a minimum data completeness in any one year of at least 75 percent of the designated sampling days.” For the most recent three complete, consecutive calendar years, 2023 through 2025, the southeast Michigan monitors have a current DV in the range of 69 ppb to 72 ppb and upon the USEPA concurrence of EE demonstrations will have DVs in the range of 68 ppb to 70 ppb. The southeast Michigan monitoring sites also have a yearly completeness over 84 percent, and an average completeness over 95 percent. These completeness values align with the requirements under 40 CFR,

Part 50, Appendix I. Upon the USEPA's concurrence of the related EE demonstrations, the 2022 through 2025 DVs will be at or below the 2015 ozone NAAQS of 70 ppb, demonstrating the monitoring data is attaining the NAAQS for the southeast Michigan NAA.

3.2 Quality-assured Data

CAA Section 107(d)(3)(E)(i) requires that the ambient air quality data was collected and quality-assured in accordance with 40 CFR, Part 58, Ambient Air Quality Surveillance, and recorded in the Air Quality System.

EGLE has quality-assured all ozone data for 2020 through 2025 shown in Tables 1 and 2. EGLE submits annual data certification letters to the USEPA Region 5, certifying the completeness criteria under 40 CFR, Part 50 and the quality assurance criteria under 40 CFR, Section 58.10. Certification letters for the 2025 statewide ozone data were submitted to the USEPA on November 21, 2025, and March 12, 2026, and are available upon request.

4. CAA Section 182(b) Requirements

4.1. Applicable Requirement Under Section 182(b)

CAA Section 182(b)(1) states for moderate NAAs, "by no later than 3 years after the date of the enactment of the CAA Amendments… the State shall submit a revision to the applicable implementation plan to provide for volatile organic compound emission reductions, within 6 years after the date…, of at least 15 percent from the baseline emissions, accounting for any growth in emissions… Such plan shall provide for such specific annual reductions in emissions of volatile organic compounds and oxides of nitrogen as necessary to attain the national primary ambient air quality standard for ozone by the attainment date applicable under this Act."

As mentioned previously, the USEPA finalized a clean data determination on May 19, 2023 (88 FR 32594). As a result of the clean data determination, based on exclusion of event-influenced data, the USEPA suspended the requirements for the area to submit attainment demonstrations and associated Reasonably Available Control Measures, Reasonable Further Progress (RFP) plans, contingency measures for failure to attain or make reasonable progress, and other planning SIPs related to attainment of the 2015 ozone NAAQS, for as long as the area continues to attain the 2015 ozone NAAQS. Based on the USEPA's May 1995 Clean Data Policy, the May 19, 2023, clean data determination, and the continuation of attainment of the 2015 ozone NAAQS, certain

SIP elements, including the attainment demonstration and RFP, have been suspended by the USEPA.

4.2. Reasonably Available Control Technology (RACT)

Pursuant to CAA Sections 172, 182(b), and 182(f), states are required to implement RACT in the NAA for major sources and all sources in specified categories established through Control Techniques Guidelines for the applicable criteria pollutant and its precursors (volatile organic compounds [VOC] and nitrogen oxides [NOx]). The USEPA defines RACT as the lowest emission limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility. A source generally consists of several units that emit pollutants.

Historically, EGLE developed VOC RACT rules for past NAAs while developing attainment plans for the 1979, 1997, and 2015 ozone NAAQS. Michigan didn't have NAAs for the 2008 ozone standard. It should be noted that many sources that would be subject to VOC RACT under the 2015 ozone NAAQS have implemented VOC controls as required by the Michigan Air Pollution Control Rules adopted to meet VOC RACT requirements under the 1979 ozone NAAQS. EGLE is actively working with the USEPA to determine specific requirements and the due dates for RACT requirements.

4.3. Motor Vehicle Inspection and Maintenance

CAA Section 182(b)(4) requires states with moderate (or higher) ozone NAAs to implement a basic vehicle inspection and maintenance (I/M) program to identify and repair high-emitting vehicles. Vehicle I/M programs are requirements set forth by the 1990 amendments to the CAA for ozone and carbon monoxide NAAs based on certain criteria, including population, geographic area, and air quality status. The CAA identifies two levels of I/M programs, basic and enhanced, to be implemented based on urbanized population thresholds and NAAQS designation level. Basic I/M programs require light-duty cars to be tested and Enhanced I/M programs require both light-duty cars and trucks to be inspected.

Although Michigan is not currently required to operate a vehicle I/M program, an I/M program was previously established in the Detroit-Ann Arbor NAA from 1986 to 1995, under CAA requirements included prior to the 1990 amendments. The Automotive Emission Test program operated in Wayne, Oakland, and Macomb counties.

When the Detroit-Ann Arbor NAA was designated moderate nonattainment for the 1979 1-hour ozone NAAQS and due to the CAA amendments of 1990, EGLE was required to

incorporate a contingency provision within the CAA Section 175A maintenance plan for implementation of a basic I/M program. The I/M contingency provision needed to include a commitment, legislative authority, and an enforceable schedule for adoption and implementation of the program. Public Act (PA) 232 of 1993, established a motor vehicle emissions testing program in southeast Michigan. This Act was subsequently repealed, and its provisions were incorporated into the Natural Resources and Environmental Protection Act (NREPA), 1994 PA 451 as part of Michigan's environmental regulatory authority and framework.

EGLE submitted the elements (described above) necessary to establish basic I/M as a contingency measure in the CAA Section 175A maintenance plan as provided for by the revisions to the national I/M rule. EGLE subsequently submitted a redesignation package to the USEPA in November 1993 for the 1979 1-hour ozone NAAQS. The USEPA granted redesignation to attainment/maintenance in March 1995, and the I/M program upgrade became a contingency provision that could be implemented if there were future violations of the standard (60 FR 1735).

Although an I/M program has not been triggered since being included as a contingency provision, Michigan's PA 166 of 1996 and Part 65, Motor Vehicle Emissions Testing for Southeast Michigan, of the NREPA, contain authorities and regulations for a motor vehicle I/M emissions testing program for southeast Michigan, specifically Wayne, Oakland, and Macomb counties. As set forth in CAA Section 182(b)(4), the deadline for implementing the vehicle I/M requirements has not yet occurred. EGLE is actively working with the USEPA to determine specific requirements and the due dates for such requirements related to a vehicle I/M program.

4.4. General Offset Requirement

CAA Section 182(b)(5) requires the general nonattainment new source review (NNSR) permit offset ratio for ozone precursors set at 1.15 to 1. Michigan currently has sufficient SIP-approved (May 12, 2021, 86 FR 25954) NNSR permitting rules that address the emission offset requirement of 1.15 to 1 as Michigan Rule 336.2908(6)(a)(ii).

Documentation was submitted on January 24, 2023, certifying Michigan's existing NNSR meets the requirements of 40 CFR, 51.165. It was proposed for direct final approval on June 9, 2023, (88 FR 37766).

4.5. Not Applicable Requirements Under Section 182(b)

CAA Section 182(b)(3) – Gasoline Vapor Recovery
States are not required to implement Stage II programs in their SIPs per 77 FR 28772.

5. CAA Section 172(c)(3) Requirements

CAA Section 172(c)(3) requires each plan to "include a comprehensive, accurate, current inventory of actual emissions from all sources of the relevant pollutant or pollutants in such area..." The USEPA Guidance states "[f]or O_3 nonattainment areas, the inventory should be based on actual *typical summer day* emissions of O_3 precursors...during the attainment year." EGLE submits the following inventory to comply with this requirement.

EGLE has updated the on-road attainment inventory for 2019, additionally, the NOx and VOC emissions totals for 2019 have been updated to reflect this revision. For on-road emissions, as stated in the Southeast Michigan Council of Governments (SEMCOG) analysis (Attachment A), SEMCOG used the MOVES5 model to generate July weekday on-road emissions for 2019. Tables 3 and 4 display the updated emissions inventory for the southeast Michigan area. This inventory shows a decrease in all inventory emissions categories throughout southeast Michigan from 2014 through 2019 and a total emission decrease for both NOx and VOC.

Table 3. Southeast Michigan NOx Emissions Inventory for 2014 and 2019 (tons/ozone season day).

Emission Category	2014	2019
On-road	192.70	112.60
Nonroad	60.26	22.51
Point	166.86	97.01
Nonpoint	36.69	27.98
Total NOx Emissions	456.51	260.10

Table 4. Southeast Michigan VOC Emissions Inventory for 2014 and 2019 (tons/ozone season day).

Emission Category	2014	2019
On-road	83.20	55.40
Nonroad	69.63	30.46
Point	32.24	13.74
Nonpoint	149.93	134.77
Total VOC Emissions	335.00	234.37

6. CAA Section 175A Maintenance Plan

CAA Section 107(d)(3)(E) requires a fully approved CAA Section 175A maintenance plan for a redesignation to attainment. CAA Section 175A of the CAA and the USEPA Guidance contain the following requirements for maintenance plans with which EGLE demonstrates compliance. According to the USEPA Guidance, a state may submit both the redesignation request and the maintenance plan at the same time. EGLE submits the following revisions to the maintenance plan for approval for the southeast Michigan nonattainment area.

6.1. Maintenance for 10 Years

CAA Section 175A(a) requires that the maintenance plan must provide for maintenance of the NAAQS for at least 10 years after the redesignation. The USEPA Guidance states, “the State should project emissions for the 10-year period following redesignation...for the purpose of showing that emissions will not increase over the attainment inventory...The projected inventory should consider future growth, including population and industry, should be consistent with the attainment inventory, and should document data inputs and assumptions.”

In this submittal EGLE is utilizing the 2019 and 2035 inventory from the January 3, 2022, SIP submittal, with appropriate revisions. Additionally, EGLE has updated the maintenance year from 2035 to 2040. As mentioned in Section 5, EGLE updated the on-road attainment inventory for 2019, therefore the NOx and VOC emissions totals for 2019 have been updated to reflect this revision. To follow the USEPA guidance, on-road inventories for 2035 and 2040 were calculated by SEMCOG using MOVES5 (Attachment A). The inputs and assumptions for those projections are detailed in that analysis and are based on July weekday emissions.

The nonroad, nonpoint, and point inventory projections for 2040 were derived from the USEPA National Emissions Inventory Collaborative 2016v2 modeling platform data by calculating a linear interpolation between the modeling platform’s analytic year inventories of 2016 and 2032, consistent with accepted protocols. This process created a rate of change of NOx and VOC emissions. The linear interpolation rate was then applied to the previously developed 2035 inventory and extrapolated out five years to derive 2040. Additional information can be provided upon request.

To obtain the inventories, the annual totals of NOx and VOC for each emission category were summed to annual totals for each of the seven counties in southeast Michigan. Then, a conversion factor was created to convert the annual totals to a tons per ozone

season day value for both NOx and VOC for each county. The conversion factor is a ratio or fraction. It was generated by taking the July pollutant category emissions and dividing them by the annual total category emissions (on a per county basis for both NOx and VOC). July was chosen as the standard southeast Michigan typical ozone season month after evaluating the summer months for ozone season production.

Tables 5 and 6 demonstrate southeast Michigan's maintenance of the 2015 ozone NAAQS through continued decreasing emissions across emissions inventory categories through 2040. Table 6 shows a slight increase in point VOC emissions through 2040 but with an overall decrease in VOC emissions throughout the southeast Michigan area.

Table 5. Southeast Michigan Counties NOx Emissions Inventory Projections (tons/ozone season day).

Emission Category	2019	2035	2040
On-road	112.60	25.60	17.80
Nonroad	22.51	15.17	11.81
Point	97.01	76.44	67.33
Nonpoint	27.98	25.84	25.32
Total NOx Emissions	260.10	143.05	122.26

Table 6. Southeast Michigan Counties VOC Emissions Inventory Projections (tons/ozone season day).

Emission Category	2019	2035	2040
On-road	55.40	27.90	22.50
Nonroad	30.46	26.56	24.91
Point	13.74	14.12	14.36
Nonpoint	134.77	133.11	132.60
Total VOC Emissions	234.37	201.69	194.37

7. CAA Section 110 and Part D Requirements

CAA Section 107(d)(3)(E) requires a determination that all CAA Section 110 and Part D requirements have been met for an area to be redesignated to attainment. The USEPA Guidance states, “For the purposes of redesignation, a State must meet all requirements of Section 110 and Part D that were applicable prior to submittal of the complete redesignation request.” The USEPA Guidance suggests the only Section 110 requirements at issue are those in Section 110(a)(2). Section 110(a)(2) lists the infrastructure SIP requirements. Part D lists the general requirements for nonattainment areas. These requirements, except those of Section 176 within Part D of the CAA, were adequately addressed in the January 3, 2022, Request for Redesignation.

7.1. Conformity Requirements

The USEPA Guidance states the state must “…show that its SIP provisions are consistent with section 176(c)(4) conformity requirements. The redesignation request should include conformity procedures if the State already has these procedures in place.”

Section 176(c) of the CAA requires states to establish criteria and procedures to ensure federally supported or funded activities, including highway projects, conform to the air quality planning goals in the applicable SIPs.

7.2. Transportation Conformity Requirements and Motor Vehicle Emission Budgets

Transportation conformity under CAA Section 176(c) is the requirement to determine conformity for transportation plans, programs, and projects developed, funded, or approved under Title 23 of the United States Code and the Federal Transit Act.

Conformity to a SIP means transportation activities will not produce new air quality violations, worsen existing violations, or delay timely attainment of the NAAQS.

EGLE has updated the projected emission reductions associated with the new interim and maintenance years, 2035 and 2040, respectively.

Tables 5 through 8 list the emissions from all sectors along with the projected emissions for 2035 and 2040. Tables 7 and 8 demonstrate the projected decrease in emissions from 2019 through 2040. To obtain the safety margin, a percentage of the projected total emission decrease was added to the on-road sector for southeast Michigan. For 2035 a sixty-five percent safety margin was chosen for both NOx and VOCs because it remained below the total emission reductions for all sectors and the total MVEB remained below the 2019 on-road emissions for NOx and VOCs for 2035. For 2040, a sixty percent safety margin was chosen for both NOx and VOCs because it remained below the total emission reductions for all sectors and the total MVEB remained below the 2019 on-road emissions for NOx and VOCs for 2040. Tables 7 and 8 detail the total projected emission decrease used in the first step to create the safety margin. Table 9 details the safety margin and resulting motor vehicle emissions budget for southeast Michigan. While this addendum was out for public comment, the MVEB set forth in Table 9 was reviewed by the Inter-agency Work Group (IAWG) for concurrence. Prior to the completion of the public comment period, concurrence of the MVEB was received from the IAWG.

Table 7. Projected NOx Emission Reductions for Southeast Michigan NAA (tons/summer day).

Emission Category	2019 Emissions	2035 Projected Emissions	Projected 2035 Emissions Reductions	2040 Projected Emissions	Projected 2040 Emissions Reductions
On-road	112.60	25.60	87.00	17.80	94.80
Nonroad	22.51	15.17	7.34	11.81	10.70
Point	97.01	76.44	20.57	67.33	29.68
Nonpoint	27.98	25.84	2.14	25.32	2.66
Total NOx Emissions	260.10	143.05	117.05	122.26	137.84

Table 8. Projected VOC Emission Reductions for Southeast Michigan NAA (tons/summer day).

Emission Category	2019 Emissions	2035 Projected Emissions	Projected 2035 Emissions Reductions	2040 Projected Emissions	Projected 2040 Emissions Reductions
On-road	55.40	27.90	27.50	22.50	32.90
Nonroad	30.46	26.56	3.90	24.91	5.55
Point	13.74	14.12	-0.38	14.36	-0.62
Nonpoint	134.77	133.11	1.66	132.60	2.17
Total VOC Emissions	234.37	201.69	32.68	194.37	40.00

Table 9. Motor Vehicle Emissions Budget for Southeast Michigan NAA (tons/summer day).

Pollutant	2035 Projected On-road Emissions	65% Safety Margin	2035 Total MVEB	2040 Projected On-road Emissions	60% Safety Margin	2040 Total MVEB
NOx	25.60	76.08	101.68	17.80	82.71	100.51
VOCs	27.90	21.24	49.14	22.50	24.00	46.50

8. Title 40 Code of Federal Regulations, Part 51, Appendix V Requirements

40 CFR, Part 51, Appendix V, contains requirements EGLE must follow to revise the SIP. The applicable requirements and EGLE's fulfillment of them are as follows:

8.1. A Formal Request

Appendix V requires all SIP submittals contain a formal letter of submittal from the Governor or the Governor's designee requesting USEPA approval of the SIP revision.

A letter dated July 3, 2019, from Governor Gretchen Whitmer to the USEPA, Region 5 delegates authority from the Governor to EGLE's Director to make any SIP submittal, request, or application under the CAA. This letter was submitted to the USEPA on July 30, 2019, for inclusion in the Michigan SIP and is available upon request. This delegation of authority and the cover letter included with this SIP submittal to the USEPA satisfies the formal request requirement.

8.2. Necessary Legal Authority

Appendix V requires states to submit evidence that the state has the necessary legal authority under state law to adopt and implement the requested SIP revision.

Part 55, Air Pollution Control, of the NREPA, and Executive Reorganization Order 2011-1 provide EGLE with the legal authority under state law to implement and enforce the provisions of the Michigan SIP. A copy has been submitted to the USEPA through previous SIP submittals and is available upon request.

8.3. Sufficient Public Notice

Appendix V requires the State of Michigan to submit evidence that public notice was given of the proposed change consistent with procedures approved by the USEPA, including the date of publication of such notice.

The notice of this SIP revision and an opportunity for public comment and request for a hearing is provided in Attachment B.

8.4. Valid Public Hearing

Appendix V requires the state submits a certification that a public hearing, if held, was held in accordance with the information provided in the public notice and the state's Administrative Procedures Act.

According to the public notice in Attachment B, EGLE provided an opportunity for a public hearing upon request. As stated in the public notice, requests for a public hearing needed to be submitted to the AQD by April 8, 2026. A public hearing was requested on April 7, 2026. Notice of the requested public hearing was made available on the EGLE Calendar and the AQD Public Notice webpage for Air Quality Rules and State Implementation Plans Public Notice Documents on April 13, 2026. Additionally, notification of the requested public hearing was sent out on April 13, 2026, through EGLE's subscription platform to the Air Quality News and Information list. Additional information can be found in Attachment B.

8.5. Public Comments

Appendix V requires the state to compile any public comments and the state's responses to them in the SIP submittal.

EGLE received 158 public comments: 4 in support, and 154 in opposition. EGLE's response to these comments are included in Attachment B along with copies of the public comments.

9. Conclusion

This addendum supports the January 3, 2022, Request for Redesignation SIP submittal and documents that the southeast Michigan ozone NAA is attaining the 2015 ozone NAAQS. The State of Michigan hereby requests the USEPA reconsider the January 3, 2022, Request for Redesignation SIP submittal and that the southeast Michigan ozone nonattainment area be redesignated to attainment, simultaneously with the USEPA's approval of the maintenance plan provisions contained herein. In addition, EGLE requests the USEPA's approval that this maintenance plan satisfies the requirements of CAA Section 175A(b) for subsequent plan revisions required for areas redesignated for the 2015 ozone NAAQS.

Attachment A. Ozone On-road Emissions for the Seven Counties of Southeast Michigan (Livingston, Monroe, Macomb, Oakland, St. Clair, Washtenaw, and Wayne), March 17, 2026

Ozone On-road Emissions
for
The Seven Counties of Southeast Michigan

(Livingston, Monroe, Macomb, Oakland, St. Clair, Washtenaw, and Wayne)

March 17, 2026

Prepared by the
Southeast Michigan Council of Governments (SEMCOG)
1001 Woodward Avenue, Suite 1400
Detroit, MI 48226
(313) 961-4266

Table of Contents

1. Introduction 5
2. Geographical Area 5
3. Attainment Status 5
4. Emission Analysis Overview 5
4.1 Analysis Years 5
4.2 MOVES Run Specifications 6
4.3 On-road Emission Summary 6
5. Description of Key Modeling Inputs 6
5.1 Local Travel Data Inputs 6
5.1.1 Demographic Data 6
5.1.2 SEMCOG's Travel Demand Forecasting Model (TDFM) 7
5.1.5 Mapping TDFM Functional Classes to MOVES Road Types 8
5.1.4 Vehicle Miles Traveled (VMT) 9
5.1.5 Hourly VMT Fractions 12
5.1.6 Road Type Distribution 13
5.1.7 Vehicle Hours Traveled (VHT) and Average Speed Distributions 14
5.2 Local Vehicle Data Inputs 15
5.2.1 Vehicle Population 15
5.2.2 Vehicle Age Distribution 16
5.2.3 Alternate Vehicle and Fuel Technology (AVFT) 17
5.3. Local Meteorological Inputs 18
5.3.1 Temperature Data for Ozone Modeling 18

List of Tables:

Table 1: Ozone On-road Emissions 6

Table 2: Mapping of TDFM Functional Classes and Area Types to MOVES Road Types 8

Table 3: HPMS Normalization Factors 9

Table 4: Average Weekday Vehicle Miles Traveled (VMT) 10

Table 5: VMT Distribution Factors by HPMS Vehicle Type 10

Table 6: Monthly and Weekend Adjustment Factors 11

Table 7: Weekday Hourly Fractions for Restricted Road Types 11

Table 8: Weekday Hourly Fractions for Unrestricted Road Types 12

Table 9: Weekend Hourly Fractions for Restricted/Unrestricted Road Types 13

Table 10: Road Type Distribution 14

Table 11: Average Weekday Vehicle Hours Traveled (VHT) 14

Table 12: Mapping of Michigan DOS Body Styles to MOVES Vehicle Types 15

Table 13: Regional Vehicle Population and Growth Factors 16

Table 14: Mapping of Michigan DOS Body Styles to HPMS Vehicle Types 17

Table 15: Mapping of DOS Fuel Codes to MOVES Fuel Types 17

1. Introduction

This report describes the process used to estimate the on-road mobile emissions for the seven counties of Southeast Michigan: Livingston, Macomb, Monroe, Oakland, St. Clair, Washtenaw, and Wayne, as part of a redesignation of attainment request for the 2015 ozone National Ambient Air Quality Standard (NAAQS) by the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to the US Environment Protection Agency (EPA).

2. Geographical Area

The seven counties listed above are designated as nonattainment areas for the 2015 ozone NAAQS. Their boundaries align with those of the Southeast Michigan Council of Governments (SEMCOG) metropolitan planning organization (MPO). Throughout this report, these counties are collectively referred to as the SEMCOG region

3. Attainment Status

The SEMCOG region was originally designated nonattainment for the 1997 ozone NAAQS of 0.08 ppm. Following the successful implementation of Michigan's State Implementation Plan (SIP), the region was re-designated to maintenance status in 2009. In 2012, the SEMCOG region was designated as attainment for the 2008 ozone NAAQS of 0.075 ppm.

On August 3, 2018, the EPA designated the SEMCOG region as nonattainment for the strengthened 2015 ozone NAAQS of 0.070 ppm. Since the 1997 ozone NAAQS has been revoked, transportation conformity requirements under the Clean Air Act apply to the 2015 ozone non-attainment area. These requirements ensure that federally funded or approved highway and transit projects conform to the air quality goals established in the state's SIP. Up to this date, SEMCOG has conducted ozone conformity analysis for the entire SEMCOG region and has continued to demonstrate conformity.

4. Emission Analysis Overview

The vehicle emission estimates presented in this analysis are based on the methodology developed and used for transportation conformity analysis for the seven counties of SEMCOG region. This methodology has been reviewed and accepted by the FHWA and the EPA. To conduct conformity analysis, emissions from all vehicles operating on Southeast Michigan's roadway network are estimated using a set of interconnected computer models. These models evaluate how emissions are expected to change over time based on:

- Anticipated growth in the region, including changes in population, employment, and travel activity; and
- The implementation of regionally significant transportation projects that modify roadway capacity (e.g., constructing new roads, adding or reducing the number of traffic lanes on existing roads). The impact of major transit projects is also incorporated.

4.1 Analysis Years

Emissions were estimated for analysis years 2019, 2035, and 2040. *The Air Quality Conformity Analysis for the SEMCOG region Nonattainment Area* dated December 10, 2025, served as the primary source of input data for all three analysis years.

4.2 MOVES Run Specifications

EPA's latest Motor Vehicle Emission Simulator (MOVE5) was used to conduct on-road emission analysis. Due to the extensive travel interactions among the seven counties in the SEMCOG region, emissions for all seven counties were modeled as a single area within MOVES. The County-level run specification was applied, with Wayne County selected to represent the characteristics of the full SEMCOG region where MOVES default data were used.

Although Wayne County served as the geographic representative for MOVES default inputs, all local input data were developed to reflect actual transportation activity across all seven SEMCOG counties. The meteorological condition representative of the ten highest-ozone days was applied to the month of July to estimate ozone emissions for a typical high-ozone summer weekday.

4.3 On-road Emission Summary

The on-road emission estimates were generated using EPA's MOVES5 model, incorporating locally developed datasets prepared for the conformity analysis of SEMCOG's 2050 RTP. *Table 1* summarizes typical summer weekday emissions of the two primary ozone precursors - volatile organic compounds (VOC) and nitrogen oxides (NO_x), for each of the three analysis years. These emissions values were derived from the MOVES outputs representing July weekday conditions.

Table 1: Ozone On-road Emissions

Analysis Year	Summer Weekday Emissions (US short tons)		Regional Summer Weekday VMT (millions)
	VOC	NO_x	
2019	55.4	112.6	142.7
2035	27.9	25.6	150.7
2040	22.5	17.8	152.3

The methodology used to develop the key modeling inputs that supports these emission estimates is described in the following sections.

5. Description of Key Modeling Inputs

This section describes the key inputs used in this emission analysis, including the local travel activity data, vehicle fleet characteristics, and the temperature applied to represent typical high-ozone conditions.

5.1 Local Travel Data Inputs

Local travel data were developed using SEMCOG's Travel Demand Forecast Model (TDFM), along with other regional datasets. These datasets include demographic forecasts, roadway characteristics, and travel activity metrics that support the estimation of vehicle miles traveled (VMT), vehicle hours traveled (VHT), speed distributions, and other MOVES inputs. This subsection provides an overview of the demographic data used to support the TDFM and the methods used to generate the travel activity inputs applied in MOVES.

5.1.1 Demographic Data

The demographic inputs for SEMCOG's TDFM are based on the agency's 2050 Regional Development Forecast (RDF), adopted in March 2023. The RDF provides region-wide projections

of population, households, and employment through 2050. A three-step process was used to develop this forecast for the inputs to the TDFM.

a) Regional forecast totals of population, households and jobs were generated from the REMI (Regional Economic Models, Inc.) model. The model forecasts Southeast Michigan's ability to attract and retain population and jobs relative to all other parts of the United States. Regional totals were developed for all forecast years from the 2020 base year to 2050.

b) The regional totals were then used to develop a small-area forecast that disaggregates regional population, households and jobs into 1.8 million land parcels using the UrbanSim model. UrbanSim is a computer simulation model for planning and analysis of urban development. It incorporates the interaction between land use, transportation, and public policy. In doing so, it puts future population and jobs into the most desirable land parcels f, and models residential and nonresidential developments as demand arises.

c) Land parcels from the small-area forecast were aggregated to traffic analysis zones (TAZs) for use in SEMCOG's travel demand forecasting model.

5.1.2 SEMCOG's Travel Demand Forecasting Model (TDFM)

Vehicle miles of travel (VMT) forecasts for the on-road emissions inventory were developed using version E8 of SEMCOG's TDFM for both passenger travel and commercial vehicle travel.

E8 – passenger travel model components were inherited from E7, which was implemented in 2018 using SEMCOG's 2015 travel survey and recalibrated in 2022 with the transit ridership numbers from SEMCOG's 2019 onboard transit survey. It utilizes the standard trip-based modeling process (trip generation, trip distribution and mode choice) to model the passenger travel demand. The program is run on the platform of TransCAD.

E8 - commercial vehicle (CV) travel model components were implemented in 2021 using SEMCOG's 2017 commercial vehicle survey and other observed truck data. The CV model runs with the script language of R and includes three model components, described below at high-level.

a) The Firm Synthesis Model, which develops a list of business establishment locations and processes zonal land use data used to generate truck trip demand in later steps of the CV model.
b) The Long-Distance Truck Model, which estimates long-haul freight truck travel to and from the region, as well as external to external truck travel through the region.
c) The Commercial Vehicle Touring Model (CVTM), which estimates demand for local deliveries and the provision of services by non-freight carrying trucks. The tours and trips simulated to serve this demand, when combined with the travel from the long-distance truck model, means that the CV model simulates all truck movements within, to, from, and through the region.

The last step of SEMCOG's TDFM is traffic assignment, which runs in TransCAD and assigns zone-to-zone passenger and commercial vehicle trips to the E8 model road network by time period and vehicle type.

The E8 model base year (referred to as E8-LA20) incorporated datasets from both 2019 and 2020. Specifically, 2020 household and population data together with 2019 employment data were used as model inputs. The model was estimated with pre-COVID regional travel patterns and validated against the 2019 VMT reported through the HPMS program. As a result, the travel behavior changes associated with Covid-19 were not reflected in this version of the E8 model.

Regional travel forecasts were developed in five-year increments from the 2019/2020 base year through the horizon year of SEMCOG's 2050 RTP. The latest model networks include projects from SEMCOG's 2050 RTP and the 2026–2029 Transportation Improvement Program (TIP), amended on the Dec. 10, 2025 conformity analysis. The 2035 model (E8-LD35) network reflects the completion of several major regional projects, such as the new Gordie Howe International Bridge (GHIB), the conversion of I-375 into a new at-grade boulevard, and the implementation of Advanced Traffic Management (ATM) lanes on US-23 and I-96. The 2040 model (E8-LD40) network further incorporates partial completion of the I-94 Modernization Project.

Detailed documentation on the model is contained in a separate SEMCOG document that is available upon request.

5.1.5 Mapping TDFM Functional Classes to MOVES Road Types

To incorporate TDFM outputs into MOVES, the roadway functional classifications used in SEMCOG's model must be reconciled with the four MOVES road types used for on-road emission modeling: Urban Restricted, Urban Unrestricted, Rural Restricted and Rural Unrestricted. In MOVES, "restricted" road types refer to limited-access facilities, which in the SEMCOG region include all freeway segments. All other motorized roadway facilities are categorized as "unrestricted". The TDFM also includes several special functional classes that are not part of the regular roadway network (e.g. walk only, external zone connectors, transit-only links). These are not included in SEMCOG's emissions modeling.

Table 2: Mapping of TDFM Functional Classes and Area Types to MOVES Road Types

<table>
<tr><th rowspan="2">SEMCOG TDFM
Functional Class</th><th colspan="5">SEMCOG TDFM Area Type</th></tr>
<tr><th>Urban Business</th><th>Urban Fringe</th><th>Urban</th><th>Suburban</th><th>Rural</th></tr>
<tr><td>1 - Interstate Freeway</td><td colspan="4" rowspan="2">4 – MOVES Urban Restricted Road Type</td><td rowspan="2">2 – MOVES Rural Restricted Road Type</td></tr>
<tr><td>2 - Other Freeway</td></tr>
<tr><td>3 - Principal Arterial</td><td colspan="4" rowspan="6">5 – MOVES Urban Unrestricted Road Type</td><td rowspan="6">3 – MOVES Rural Unrestricted Road Type</td></tr>
<tr><td>4 - Minor Arterial</td></tr>
<tr><td>5/6 - Collector</td></tr>
<tr><td>7 - Local</td></tr>
<tr><td>9 - Uncertified Road</td></tr>
<tr><td>99 - Centroid connector (local road surrogate)</td></tr>
<tr><td>81 - 94 Transit Use Only</td><td colspan="5" rowspan="3">Non-road or outside region. Not used in MOVES</td></tr>
<tr><td>90 - External</td></tr>
<tr><td>96 - Walk Only</td></tr>
</table>

As TDFM functional classes do not distinguish between urban and rural facilities, the TDFM "Area Type" variable is used as a surrogate. The TDFM defines five area types (urban business, urban fringe, urban, suburban and rural) and assigns one to each roadway link based on the density of households, population and employment in the traffic analysis zone in which the link resides.

Table 2 shows how each area type and functional class in SEMCOG's TDFM is mapped to the four road types used in MOVES.

5.1.4 Vehicle Miles Traveled (VMT)

MOVES provides an option to input annual VMT by the six FHWA Highway Performance Monitoring System (HPMS) vehicle classes, with the passenger cars (HPMS 20) and other 4-tire/2-axle vehicles (HPMS 30) combined into a single category, HPMS 25.

- HPMS10 – Motorcycle
- HPMS25 - Passenger car and Other 4-tire, 2-axle vehicles
- HPMS40 – Bus
- HPMS50 - Single unit truck
- HPMS60 - Combination truck

Local VMT inputs for MOVES were derived from SEMCOG's TDFM. While the model produces average weekday VMT forecasts, it does not disaggregate VMT by individual MOVES vehicle types. Therefore, additional processing steps are necessary to convert TDFM outputs into the format required for MOVES.

a) HPMS Normalization

In accordance with EPA and FHWA guidance, SEMCOG TDFM VMT was normalized to match HPMS VMT at county and road-type level. Normalization factors were developed by dividing the 2019 HPMS VMT by the 2020 model VMT estimated from E8-LA20. *Table 3* shows the resulting factors. These factors were applied to TDFM VMT in all forecast years.

Table 3: HPMS Normalization Factors

County	Road Type	
	Restricted	Unrestricted
Livingston	1.14164	0.98447
Macomb	0.86251	1.06446
Monroe	0.96648	1.06906
Oakland	0.88927	0.97795
St Clair	1.03914	1.39949
Washtenaw	1.05165	0.92587
Wayne	0.93895	1.23753

b) Average Weekday VMTs

Since the E8 model base year was calibrated and normalized to the 2019 HPMS VMT totals, the normalized VMT outputs from the TDFM base year (E8-LA20) were used as the VMT inputs for the 2019 analysis year. Similarly, VMT inputs for the 2035 and 2040 analysis years were taken from TDFM E8-LD35 and E8-LD40, respectively.

Table 4 presents the normalized regional VMT from SEMCOG's TDFM for all three analysis years: 2019, 2035 and 2040.

Table 4: Average Weekday Vehicle Miles Traveled (VMT)

MOVES Road Type	2019 (E8-LA20)	2035 (E8-LD35)	2040 (E8-LD40)
Rural Restricted	9,536,693	10,106,226	10,279,950
Rural Unrestricted	12,964,462	14,013,146	14,239,467
Urban Restricted	39,725,909	42,273,246	42,834,705
Urban Unrestricted	71,612,188	74,949,076	75,515,318
Region Total	133,839,252	141,341,694	142,869,440

c) Distribution of VMT Among HPMS Vehicle Types

Two sets of VMT distribution factors (one for restricted roadways and one for unrestricted roadways) were developed to allocate total VMT of an analysis year among five vehicle classes described earlier in this section.

Because scheduled traffic count collection in 2020 was suspended due to COVID-19 impacts, no updated count data were available for developing new distribution factors. As a result, the VMT distribution factors originally developed using the 2015 traffic counts for SEMCOG's 2045 RTP were carried forward for use in the 2050 RTP. These factors, derived from the 2015 count dataset, are presented in *Table 5*.

Table 5: VMT Distribution Factors by HPMS Vehicle Type

HPMS Vehicle Type	Restricted	Unrestricted
H10 – Motorcycle	0.00276	0.00589
H25 - Passenger Car and Other 4-tire, 2-axle vehicles	0.89201	0.90783
H40 – Bus	0.00166	0.00442
H50 - Single-Unit Truck	0.01931	0.05772
H60 - Combination Truck	0.08426	0.02414

d) Conversion of Average Weekday VMT to Annual VMT

Monthly and weekend adjustment factors were developed using 2014-2016 traffic count data from the 35 PTR stations in Southeast Michigan. Monthly adjustment factors for motorcycles were developed separately due to their significant difference from other vehicle types. Weekend adjustment factors were also developed for each of the five vehicle types to account for the significant variations observed between vehicle classes. These adjustment factors (shown in *Table 6*), along with the HPMS-normalized weekday VMT by vehicle type, were then entered into EPA's AADVMT converter of "*moves5-aadvmt-converter-tool-2024-11.xls"* to compute the annual VMT, as well as the monthly and daily VMT fractions needed for MOVES5.

Table 6: Monthly and Weekend Adjustment Factors

Month	Monthly Adjustment Factors		Weekend Adjustment Factors				
	Motorcycle	Others	H10	H25	H40	H50	H60
Jan	0.61591	0.84277	0.74004	0.76880	0.50814	0.31258	0.34568
Feb	0.64898	0.89507	0.72627	0.74810	0.53906	0.28693	0.32378
Mar	0.70943	0.97283	0.78072	0.80027	0.56487	0.28654	0.32074
Apr	0.86564	1.01831	1.06431	0.80995	0.56013	0.30115	0.30696
May	1.18817	1.03520	1.00755	0.82747	0.51042	0.31796	0.31331
Jun	1.39409	1.08036	1.09094	0.82842	0.53217	0.34252	0.32225
Jul	1.47548	1.06434	1.04333	0.83058	0.61693	0.34956	0.31060
Aug	1.42116	1.07990	1.07714	0.85262	0.61017	0.36666	0.32662
Sep	1.29399	1.04244	1.02136	0.85271	0.61270	0.36014	0.32851
Oct	0.95050	1.04384	0.84475	0.82973	0.63029	0.33629	0.33077
Nov	0.78996	0.98673	0.72377	0.79581	0.61643	0.32037	0.34036
Dec	0.64280	0.93822	0.77974	0.78883	0.52432	0.31239	0.34840

Table 7: Weekday Hourly Fractions for Restricted Road Types

HOUR	H10	H25	H40	H50	H60	Total
1	0.00901	0.00853	0.01300	0.00685	0.01929	0.00941
2	0.00506	0.00508	0.01077	0.00607	0.01775	0.00618
3	0.00495	0.00412	0.01079	0.00671	0.01748	0.00531
4	0.00572	0.00487	0.01220	0.00855	0.01974	0.00621
5	0.01331	0.01094	0.01839	0.01323	0.02500	0.01218
6	0.03873	0.02914	0.02854	0.02445	0.03304	0.02940
7	0.05610	0.05634	0.04263	0.05114	0.04400	0.05518
8	0.05897	0.07031	0.05985	0.06570	0.04968	0.06843
9	0.05187	0.06151	0.06112	0.07814	0.05658	0.06139
10	0.04527	0.04812	0.06610	0.07654	0.06325	0.04996
11	0.04491	0.04411	0.06347	0.07401	0.06555	0.04653
12	0.04792	0.04569	0.05739	0.07388	0.06606	0.04798
13	0.05076	0.04846	0.06006	0.07350	0.06413	0.05029
14	0.05422	0.05120	0.06267	0.07587	0.06291	0.05269
15	0.06414	0.06073	0.06700	0.07750	0.06062	0.06107
16	0.07425	0.07509	0.06726	0.07268	0.05566	0.07339
17	0.07592	0.08344	0.05918	0.06113	0.04929	0.08007
18	0.07156	0.08323	0.05087	0.04636	0.04353	0.07909
19	0.06320	0.06326	0.04795	0.03500	0.04076	0.06079
20	0.04912	0.04401	0.03725	0.02398	0.03570	0.04292
21	0.03837	0.03466	0.02944	0.01737	0.03160	0.03407
22	0.03307	0.02891	0.03085	0.01314	0.02904	0.02863
23	0.02533	0.02233	0.02336	0.01009	0.02620	0.02243
24	0.01823	0.01591	0.01989	0.00810	0.02316	0.01638

5.1.5 Hourly VMT Fractions

Two data sources were used to develop the hourly VMT fractions required for MOVES:

- 2015 SEMCOG screen line traffic counts - These counts include classification information but were only collected on weekdays.
- 2015 PTR count data within the SEMCOG region - These data include both weekdays and weekends. All PTR stations are located on freeways and only a limited number provide vehicle classification data.

Using these datasets, SEMCOG developed weekday hourly VMT fractions for each of five HPMS vehicle types, differentiated by restricted (*Table 7*) and unrestricted (*Table 8*) MOVES road types.

For weekends, however, the available count data was not sufficiently robust to produce reliable factors by either road type or vehicle class. As a result, a single unified set of hourly VMT factors was developed for weekend days, as shown in *Table 9*.

Table 8: Weekday Hourly Fractions for Unrestricted Road Types

Hour	H10	H25	H40	H50	H60	Total
1	0.00536	0.00794	0.00434	0.00529	0.01420	0.00791
2	0.00371	0.00543	0.00249	0.00395	0.01364	0.00552
3	0.00416	0.00527	0.00357	0.00407	0.01379	0.00539
4	0.00426	0.00685	0.00344	0.00528	0.01637	0.00696
5	0.00865	0.01299	0.00744	0.00917	0.02186	0.01294
6	0.01924	0.02808	0.01596	0.02223	0.03012	0.02769
7	0.03800	0.04830	0.06490	0.04586	0.04488	0.04809
8	0.06079	0.06905	0.09539	0.06604	0.06031	0.06873
9	0.05785	0.06046	0.09259	0.07022	0.06781	0.06133
10	0.04103	0.04541	0.06258	0.06268	0.06417	0.04691
11	0.04297	0.04380	0.05978	0.06083	0.06390	0.04533
12	0.04714	0.04747	0.06159	0.06332	0.06677	0.04891
13	0.05924	0.05097	0.05531	0.06543	0.06308	0.05216
14	0.06083	0.05242	0.06116	0.06275	0.06378	0.05338
15	0.07287	0.06154	0.08679	0.06809	0.06259	0.06213
16	0.08846	0.07415	0.09969	0.07556	0.06072	0.07411
17	0.10167	0.08174	0.08279	0.07774	0.05772	0.08105
18	0.09847	0.08327	0.04963	0.07190	0.05491	0.08187
19	0.07032	0.06446	0.03165	0.05387	0.04189	0.06319
20	0.04197	0.04739	0.01901	0.03639	0.03149	0.04621
21	0.03187	0.03906	0.01488	0.02833	0.02705	0.03800
22	0.01966	0.02956	0.01118	0.01918	0.02313	0.02866
23	0.01337	0.02062	0.00735	0.01304	0.01861	0.02003
24	0.00810	0.01378	0.00649	0.00879	0.01722	0.01351

Table 9: Weekend Hourly Fractions for Restricted/Unrestricted Road Types

HOUR	H10	H25	H40	H50	H60	Total
1	0.01635	0.01781	0.03310	0.01946	0.03316	0.01839
2	0.01066	0.01119	0.02323	0.01586	0.02873	0.01187
3	0.00790	0.00841	0.01984	0.01526	0.02595	0.00911
4	0.00579	0.00642	0.01708	0.01556	0.02498	0.00718
5	0.00749	0.00823	0.01755	0.01712	0.02806	0.00902
6	0.01279	0.01332	0.02291	0.02249	0.03179	0.01407
7	0.01867	0.02010	0.03379	0.03690	0.03798	0.02089
8	0.02291	0.02624	0.05137	0.05046	0.04349	0.02708
9	0.03282	0.03478	0.05412	0.06060	0.04905	0.03552
10	0.04456	0.04581	0.05471	0.06376	0.05285	0.04622
11	0.05503	0.05565	0.05689	0.06525	0.05602	0.05574
12	0.06466	0.06392	0.05137	0.06709	0.05710	0.06369
13	0.07084	0.06986	0.05404	0.06761	0.05578	0.06932
14	0.07520	0.07230	0.04839	0.06710	0.05434	0.07159
15	0.07703	0.07398	0.04786	0.06348	0.05153	0.07307
16	0.08072	0.07576	0.05201	0.06053	0.04996	0.07469
17	0.07736	0.07454	0.05285	0.05702	0.04782	0.07342
18	0.07136	0.07088	0.05550	0.05255	0.04620	0.06982
19	0.06338	0.06289	0.05654	0.04594	0.04549	0.06211
20	0.05482	0.05373	0.04961	0.03817	0.04285	0.05321
21	0.04560	0.04517	0.03900	0.03143	0.03990	0.04486
22	0.03578	0.03735	0.04079	0.02575	0.03628	0.03722
23	0.02814	0.02989	0.03471	0.02164	0.03196	0.02990
24	0.02016	0.02177	0.03273	0.01898	0.02874	0.02201

5.1.6 Road Type Distribution

Several steps were undertaken to develop the VMT road type distribution factors for each HPMS vehicle class. First, the 2019 HPMS VMT numbers were grouped into four MOVES road types (Urban Restricted, Urban Unrestricted, Rural Restricted and Rural Unrestricted). Next, the VMT associated with each MOVES road type was allocated across the five HPMS vehicle classes using the vehicle-type distribution factors developed earlier (*Table 5*). The final VMT road-type distribution factors (shown in

Table 10) were then calculated by dividing the VMT for each MOVES road type and each HPMS vehicle type by the total VMT of each HPMS vehicle class.

Table 10: Road Type Distribution

HPMS Vehicle Type	MOVES Road Type			
	Rural Restricted	Rural Unrestricted	Urban Restricted	Urban Unrestricted
H10 - Motorcycle	0.020290	0.048728	0.193794	0.737189
H25 - Passenger Car or Other 4-tire, 2-axle vehicles	0.034454	0.039461	0.329089	0.596996
H40 - Bus	0.017007	0.050876	0.162438	0.769680
H50 - Single-Unit Truck	0.015430	0.051907	0.147378	0.785285
H60 - Combination Truck	0.063482	0.020471	0.606346	0.309700

5.1.7 Vehicle Hours Traveled (VHT) and Average Speed Distributions

MOVES determines operating mode distributions based on the allocation of vehicle hours traveled (VHT) across average-speed bins. To develop the local average-speed distribution, SEMCOG used congested speeds and VHT outputs from the TDFM to calculate the proportion of VHT falling within each MOVES speed bin. The average-speed distributions for the 2019, 2035, and 2040 analysis years were derived from the speed outputs of TDFM E8-LA20, E8-LD35, and E8-LD40, respectively. *Table 11* presents the VHT totals of the three analysis years reported by the TDFM.

Table 11: Average Weekday Vehicle Hours Traveled (VHT)

MOVES Road Type	2019 (E8-LA20)	2035 (E8-LD35)	2040 (E8-LD40)
Rural Restricted	143,133	155,182	159,420
Rural Unrestricted	457,551	509,650	521,494
Urban Restricted	803,342	884,184	901,022
Urban Unrestricted	2,881,632	3,114,552	3,153,659
Region Total	4,285,658	4,663,568	4,735,595

MOVES requires users to input hourly speed distributions by road type and vehicle class. While SEMCOG's TDFM does not provide hourly speeds, it does produce speeds for five model time periods:

- AM peak, simulating the hours of 6:30 - 9:00 a.m.
- Mid-day, simulating the hours of 9:00 a.m. - 2:30 p.m.
- PM peak, simulating the hours of 2:30 - 6:30 p.m.
- Evening, simulating the hours of 6:30 p.m. - 10:00 p.m.
- Night, simulating the hours of 10 p.m. – 6:30 a.m.

For MOVES, separate speed distributions were developed for each of these time periods and then applied to all hours within that period. This was done as follows:

- For each time period, the directional congested speed of each roadway link was assigned to one of MOVES 16 speed bins.
- The associated directional VHTs on the links were then aggregated by speed bin and MOVES road type.
- Then, for each road type, the VHT fraction in each speed bin was computed.

For each analysis year, the average speed distributions were developed. As no local data is currently available to differentiate speeds between vehicle classes, the same speed distributions were applied to all vehicle types.

5.2 Local Vehicle Data Inputs

5.2.1 Vehicle Population

Vehicle population inputs for the 2019 analysis year were developed using 2019 vehicle registration datasets obtained from the Michigan Department of State (DOS). The data fields of body style, plate type and use type were used to determine the MOVES source type for each vehicle. *Table 12* summarizes the mapping of each combination of these data fields to the appropriate MOVES source type. When DOS data lacked sufficient detail for certain vehicle categories, MOVES default distributions for Southeast Michigan counties were used to supplement the assignment. As noted in the table, vehicle populations for transit buses (M42) and school buses (M43) in the base year were derived from 2018/2019 bus fleet data obtained from the Michigan Department of Transportation (MDOT) and Michigan Department of Education (MDOE).

Table 12: Mapping of Michigan DOS Body Styles to MOVES Vehicle Types

MOVES Vehicle Type	Michigan DOS Body Style
M11 – Motorcycle	Motorcycle
M21 – Passenger Car	2-door, 4-door, Convertible
M31 – Passenger Truck	Non-Commercial Station Wagon/Pick-up/Van
M32 – Light Commercial Truck	Ambulance, Hearse, Panel, Commercial Station Wagon/Pick-up/Van
M41 – Other Bus	Bus population from DOS registration database
M42 – Transit Bus	DOS data not used. Instead, MDOT 2018/2019 transit bus fleet data of SEMCOG region was used.
M43 – School Bus	DOS data not used. Instead, MDOE 2018/2019 school bus fleet data of SEMCOG region was used.
M51 – Refuse Truck	Dump Truck, Mixer, utility, Wrecker, Stake, Tank (Apportioned this data to M51, M52 and M53 vehicle types using split factors from MOVES4 default run.)
M52 – Single-unit Short-haul Truck	
M53 – Single–unit Long-haul Truck	
M54 – Motor Home	Motor Home
M61 & M62 – Combination Truck	DOS data not used. Instead, National default numbers of SEMCOG region were used.

Following the methodology described earlier, the 2023 vehicle population was developed from the 2023 Michigan DOS vehicle registration dataset and used as the base for projecting future-year vehicle populations. Growth rates for 2035 and 2040 relative to 2023 were calculated using regional population, household, and employment forecasts from SEMCOG's 2050 Regional Development Forecasts (RDF). These growth factors were then uniformly applied to the 2023 vehicle population to produce vehicle population estimates for the 2035 and 2040 analysis years for all MOVES source types except M61 and M62. Due to lacking sufficient information of combination trucks available at the time of the development, a MOVES default-scale run was used to obtain the combination truck populations of SEMCOG region for each analysis year. *Table 13: Regional Vehicle Population and Growth Factors* presents both the resulting growth factors and vehicle population estimates for these analysis years.

Table 13: Regional Vehicle Population and Growth Factors

MOVES Source Type	Actual Veh Pop	Base Year Veh Pop	Forecast Year	
	2019	2023	2035	2040
M11	95,752	95,284	99,386	100,304
M21	1,394,877	1,094,594	1,141,720	1,152,261
M31	2,053,397	2,305,329	2,404,580	2,426,783
M32	96,743	105,801	110,356	111,375
M41	3090	2842	2,964	2,992
M42	4209	4209	4,390	4,431
M43	1031	1031	1,075	1,085
M51	165	180	188	190
M52	24,153	26,419	27,556	27,810
M53	1,079	1,180	1,231	1,243
M54	10,277	10,381	10,828	10,928
M61	20,460	20,684	23,662	24,268
M62	12,324	12,459	14,253	14,618
Regional Total	**3,705,233**	**3,667,934**	**3,842,189**	**3,878,288**
Growth Factor	N.A.	1.000000	1.043053	1.052684

Detailed documentation on the development of SEMCOG's vehicle population data is contained in a separate SEMCOG mobile emissions model development memo, which is available upon request.

5.2.2 Vehicle Age Distribution

Similar to the development of vehicle population inputs, the 2019 and 2023 Michigan DOS vehicle registration datasets were used to develop the vehicle age distributions required for MOVES. The DOS body-style field was used to assign each vehicle to one of the six HPMS vehicle types (see *Table 14*). After assigning HPMS vehicle types, the data were aggregated by model year and grouped into the appropriate age categories. The age distribution from age 0 through 30+ were then calculated for each HPMS vehicle type.

Using the 2023 base year dataset, future-year age distributions were projected using EPA's age projection tool ("*moves4-age-distribution-projection-tool-2023-08*.xls"). Because these age distributions were originally developed in MOVES4 format, the MOVES5 built-in conversion tool was subsequently used to convert them into MOVES5-compatible format. During this process, age fractions for ages 30-40 were estimated based on the developed fractions at age 30.

For Single–unit Long-haul Truck (M-53) and combination trucks (M61 & M62), the default MOVES5 age distribution was used for each analysis year.

Table 14: Mapping of Michigan DOS Body Styles to HPMS Vehicle Types

HPMS Vehicle Type	Michigan DOS Body Style
H10 – Motorcycle	Motorcycle
H20 – Passenger Car	2-door; 4-door; Convertible
H30 – Other 4-tire, 2-axle vehicles	Station Wagon; Pick-up/Van; Ambulance; Hearse; Panel;
H40 – Bus	Bus
H50 – Single-unit Short Truck	Dump Truck; Mixer; Utility; Wrecker; Stake; Tank, Motor Home
M53, M61 and M62 – Long-haul/Combination Truck	MOVES 5 Default Data

5.2.3 Alternate Vehicle and Fuel Technology (AVFT)

The vehicle fuel-engine fractions of the AVFT table were developed using the fuel-code information from the 2023 Michigan DOS vehicle registration dataset, supplemented with the 2018/2019 school/transit bus fleet data. Each vehicle record was assigned to one of five MOVES fuel types based on its reported fuel-code (see *Table 15*). Vehicles sharing the same MOVES fuel type were then counted by MOVES source type and model year. Fuel-engine fractions were calculated for model years 1993 through 2023 for the following vehicle source types or source-type groups: 21, 31, 32, 41 & 42 & 43, 51 & 52 & 53, and 54.

Using the dataset constructed for vehicle model years 1993-2023, fuel-engine fractions for all analysis years were projected by EPA's AVFT tool included with MOVES5.

Table 15: Mapping of DOS Fuel Codes to MOVES Fuel Types

MOVES Fuel Type	DOS Fuel Code
1-Gasoline	Convertible
	Electric & Gas Hybrid
	Flexible
	Gas
	Gas & Oil Mix
2-Diesel Fuel	Diesel
	Electric & Diesel Hybrid
3-Compressed Natural Gas	Butane
	Comp Nat Gas
	Liq Nat Gas
	Propane
5-Ethanol (E85)	Alcohol
	Ethanol
9-Electricity	Electric
	FEV
	PHEV

5.3. Local Meteorological Inputs

5.3.1 Temperature Data for Ozone Modeling

For the ozone analysis, the objective is to simulate the on-road emissions that are likely to occur on days when meteorological conditions that are conducive to high ozone formation (i.e., hot summer days). Emission inventory data from 2019 to 2021 was used to develop the ozone SIP and redesignation submittal for the SEMCOG region. To represent typical high-ozone conditions, the maximum summer temperature input for MOVES was calculated as the average of daily maximum temperatures recorded on the 10 highest-ozone days across these three years. Likewise, the minimum summer temperature was calculated at the average of the daily minimum temperatures on these same days. This yielded a maximum temperature of 88.7°F and a minimum temperature of 63.7°F, which were then converted into the hourly temperature inputs for MOVES. These temperature numbers, along with the default relative humidity data provided in MOVES5, were assigned to the month of July to simulate a typical summer day for ozone emission modeling.

Attachment B. Public Participation Process Documentation

Response to Public Comments

The purpose of the Response to Comments document is to discuss the public participation process for the Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard and Revision to Michigan's State Implementation Plan and Ozone Maintenance Plan for Southeast Michigan Ozone Nonattainment Area, detail the comments received during the comment period and our responses, and discuss the changes made, if any.

Copies of the comments received are also included in this attachment.

Public Comment Period and Opportunities to Participate

Through this attachment Michigan is providing evidence that the Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard and Revision to Michigan's State Implementation Plan and Ozone Maintenance Plan for Southeast Michigan Ozone Nonattainment Area complied with the public notice and hearing requirements under Title 40 of the Code of Federal Regulations (CFR), Part 51, Appendix V, as discussed within the submittal document under Section 8.

On March 23, 2026, a public comment period was opened. The public participation process involved providing the following information for public review:

- The State Implementation Plan (SIP) documents related to the Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard and Revision to Michigan's State Implementation Plan and Ozone Maintenance Plan for Southeast Michigan Ozone Nonattainment Area were placed on the Air Quality Division (AQD) Public Notice webpage for Air Quality Rules and State Implementation Plans Public Notice Documents and the State Implementation Plan (SIP) and Attainment webpage.
- The public comment announcement was posted on the EGLE Calendar and the AQD Public Notice webpage for Air Quality Rules and State Implementation Plans Public Notice Documents. The Michigan Department of Environment, Great Lakes, and Energy (EGLE) calendar notice is included in Attachment C and the AQD Public Notice is included in Attachment D.
- All notifications of the comment period included links to the SIP document.
- A request for an in-person public hearing was requested on April 7, 2026 and was considered by EGLE AQD. Rather than one in-person meeting a virtual public hearing was held on April 22, 2026. As this addendum covers a seven-

county area, a virtual hearing was appropriate, as it provided a fair opportunity for public input, and the flexibility to attend the hearing from their location at the time of the hearing. The hearing was attended by 28 individuals.

- A notification of the requested public hearing was sent on April 13, 2026, through EGLE's subscription platform to the Air Quality News and Information list.
- The requested public hearing announcement was posted on the EGLE Calendar and the AQD Public Notice webpage for Air Quality Rules and State Implementation Plans Public Notice Documents. The EGLE Calendar notice is included in Attachment E and the updated AQD Public Notice is included in Attachment F.
- During the comment period, comments could be submitted by mail, email, and during the public hearing. The following is a summary of the public comment period:
  - Comment Period: March 23 – April 22, 2026
  - Public Hearing: April 22, 2026, 6:00 – 7:25 p.m. EDT
  - Total Responses Received: 158 submittals (often containing many individual comments) from groups or individuals. Of those comments 4 were in support and 154 were in opposition. Of those comments in opposition, 139 were part of a public comment campaign organized by the Sierra Club. As 75 of the Sierra Club campaign comments were not personalized and were identical, only one of the comments is included in the addendum. However, the remaining 74 identical comment letters are available and can be provided upon request.
  - Revisions Made Due to Comments: 0

Comments resulting in changes to the addendum

No changes were made to the addendum based on comments received.

Comments not resulting in changes to the addendum

Numerous comments were received that did not lead to changes in the final addendum based on comments received. The comments have been summarized below.

1. Comment

Commenters mention that wildfire smoke is becoming more common and not an exceptional event. Additionally, they commented that an exceptional event is not a pollution control strategy and the days impacted by wildfire smoke should not be excluded.

Response:

The United States Environmental Protection Agency (USEPA) promulgated the Exceptional Events Rule in 2007 to address the federal Clean Air Act (CAA), Section 319(b), which allows for the exclusion of air quality monitoring data influenced by exceptional events from use in determinations of exceedances or violations of the national ambient air quality standards (NAAQS). The Exceptional Events Rule at 40 CFR, 50.14(c)(3) clarifies that an exceptional events demonstration must demonstrate that the event was both not reasonably controllable and not reasonably preventable, and wildfires fall into this category.

The USEPA's and the AQD's missions are to preserve and improve air quality to protect human health and the environment, and the CAA and the USEPA's regulations rely heavily on ambient air quality data. However, the CAA recognizes that it may not be appropriate to use the monitoring data influenced by ''exceptional'' events that are collected by the ambient air quality monitoring network when making certain regulatory determinations. When ''exceptional'' events cause exceedances or violations of the NAAQS that subsequently affect certain regulatory decisions, it is important to take those events into account in determining the appropriate emission reduction strategies. Failing to account for the impacts of the exceptional events can result in the development and implementation of ineffective emission reduction strategies.

2. Comment

A commenter believes EGLE should submit additional exceptional event demonstrations for all of the other effected days so that the corrected design values (DV) will be significantly lower than the 2015 ozone NAAQS, minimizing the need to invoke the maintenance plan in the future. Additionally, this commenter indicated doing this could impact the need to invoke Reasonably Available Control Technology (RACT)/Reasonably Available Control Measures, and other requirements associated with the redesignated attainment area.

Response:

The Exceptional Events Rule can only be applied to exceedances or violations which are of regulatory significance, and using an exceptional event demonstration strictly to lower DVs is not considered regulatory significant.

3. Comment

Numerous commenters expressed concerns about public health in the southeast Michigan area. Additionally, a commenter recommended EGLE includes metrics on asthma, asthma related hospital visits, and school absenteeism due to respiratory illness. A commenter also

suggested EGLE create a plan that will keep all Michiganders safe and healthy.

Response:

The NAAQS are designed to protect public health, including sensitive groups like people with pre-existing health conditions. Specifically, during the USEPA's 2020 review of the standard, the USEPA included Detroit as one of 8 study areas where they estimated population exposure and risk to inform conclusions on the public health protections afforded by the current standard[1]. As a result, public health in southeast Michigan was one of the factors used to develop the health-based NAAQS for ozone.

The USEPA guidance does not require states to include metrics associated with public health in SIP submittals associated with redesignation requests and maintenance plans.

In response to the request to "create a plan that will keep all Michiganders safe and healthy"; Michigan's SIP implements, maintains, and is used to enforce the 2015 ozone standard (and other NAAQS) or other requirements of the CAA.

4. Comment

Several commenters indicated that EGLE needs to consider environmental justice (EJ) in the southeast Michigan area. Specifically, one commenter mentioned that areas of Wayne County score above the 90th percentile on the overall screening score, the environmental conditions score, and the ozone-specific score when using the MiEJScreen tool. One commenter suggested that the addendum should include: a cumulative impact analysis, designate priority protection zones, require enhanced emission reductions and monitoring in these areas, and establish a formal community oversight mechanism.

Response:

EGLE does not have the ability to base its decision on whether the area is considered an EJ area. However, when we open a submittal for public comment, we do evaluate the local community or communities. This includes considering how, where, and when to host an informational session and hearing. In this case, we determined having a virtual meeting would serve the greatest amount of the seven-county area. We also determine whether translation is required (based on our Limited English Proficiency Plan), and other community specific concerns. In this case, the requirement to translate documents was not triggered. Even when automatic translation is not triggered, we are always open to requests to do so. We did not receive any specific requests for translation for the addendum.

Cumulative impacts can be defined as the totality of exposures to combinations of chemical and non-chemical stressors and their effects on health, well-being, and quality of life

[1] https://www.federalregister.gov/d/2020-28871/p-227

outcomes[2]. This definition was published in 2022 to frame the priority research for the USEPA's Office of Research and Development. As a result of the complexity of this issue, there is often not enough information to address some of the concerns related to the limitations in the regulations EGLE is required to follow.

Some concerns related to cumulative impacts are addressed within the 2015 ozone standard.

- The 2015 ozone standard was developed to be health protective. Research studies were used to consider both real-world exposure conditions and sensitive groups. Epidemiological studies used to develop the standard, consider real-world conditions, like multiple exposures, and sensitive groups, like children with asthma. The controlled human exposure studies included sensitive groups like adults with asthma.
- While the 8-hour primary health standard for ozone is the current standard, it was developed following review of the 2008 ozone standard that found lowering the standard to 70 parts per billion (ppb) provides increased protection for children, older adults, and people with asthma or other lung diseases[3].
- The standard also reflects what the USEPA considers an adequate margin of safety to be health-protective of the general public, including sensitive groups.

Please refer to Comment 6 for a response associated with requesting more emission reductions; and Comment 14 for a response associated with wanting more air quality monitoring. As for designating priority protection zones, EGLE worked with the USEPA to determine designations associated with the 2015 ozone standard. The USEPA does not require further designating priority areas but designates areas that are in nonattainment of the standard.

Finally, EGLE opened a public comment period for input from the public on the draft addendum on March 23, 2026, which closed at 11:59 p.m. on April 22, 2026. This public comment period is required under 40 CFR, Part 51, Appendix V. The USEPA does not require states to create a community oversight mechanism for SIP documents.

5. Comment

Commenters request that EGLE complete the outstanding moderate nonattainment obligations. Specifically, several commenters ask EGLE to issue RACT rules for volatile

[2] U.S. EPA. Cumulative Impacts Research: Recommendations for EPA's Office of Research and Development. U.S. Environmental Protection Agency, Washington, D.C., EPA/600/R-22/014a, 2022

[3] October 26, 2015, Federal Register (FR), at 80 FR 65292.

organic compounds (VOC) and nitrogen oxides (NOx) sources in the southeast Michigan area.

Response:

The proposed redesignation addendum states how EGLE is currently meeting the moderate nonattainment CAA requirements for the southeast Michigan area. EGLE is currently working with the USEPA to determine specific requirements and deadlines for RACT requirements. Historically, EGLE has promulgated and implemented VOC RACT rules under Part 6 of the Michigan Air Pollution Control Rules (MAPCR) for the earlier ozone standards. These rules impact existing sources within the historic southeast Michigan nonattainment area and have served as the minimum requirement for new permitted sources of VOCs through Rule 702 under Part 7 of the MAPCR. Additionally, Michigan has VOC Best Available Control Technology requirements for all new emission sources across the state.

6. Comment

Several commenters request more VOC and NOx emission reductions in the southeast Michigan area. Specifically, commenters are requesting emission reductions from power plants, industrial facilities, concrete batch plants and crushing operations, and refineries.

Response:

Significant VOC and NOx emissions reductions have been made over time to sources within the power and industrial sectors (point sector). EGLE's emissions inventories show a 43% NOx reduction and 31% VOC reduction from 2014 to 2019. Additionally, three DTE power plants in southeast Michigan have closed since 2019, River Rouge (2021) and St. Clair and Trenton Channel (2022) sites. DTE is also in the process of converting Units 1 and 2 at the Belle River Power Plant from coal burning to a natural gas peaking plant where units will be used only to support grid reliability during times of high demand. The Unit 1 conversion was completed in 2025 and the Unit 2 conversion is expected to be completed in the fall of 2026. Overall, the reductions in the redesignation addendum reflect implementation of existing federal and state control programs, and also demonstrate reductions and projected future inventories that maintain compliance with the 2015 ozone standard in southeast Michigan.

7. Comment

Several commenters request EGLE to enforce air quality standards and ozone limits.

Response:

Michigan's SIP implements, maintains, and is used to enforce the 2015 ozone standard

(and other NAAQS) and other requirements of the CAA. In the 2022 Request for Redesignation, EGLE commits to maintaining control measures for VOC and NOx emissions that were contained in the SIP before redesignation of the southeast Michigan area to attainment.

8. Comment

Commenters are requesting EGLE lower transportation-related ozone pollution, specifically, from heavy-duty diesel trucks. One commenter suggested EGLE consider an indirect source rule for southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. Lastly, several commenters address a fugitive dust issue associated with trucking container and freight yards in southeast Michigan.

Response:

This addendum does not include revisions to the contingency provisions or development of new rules to address air quality. The suggested revisions may be considered if the need for additional emission reductions occurs in the future for the area.

9. Comment

Two commenters suggest strengthening the contingency provisions in the maintenance plan associated with the 2022 Request for Redesignation.

Response:

This addendum does not include revisions to the contingency provisions in the 2022 Request for Redesignation. The existing contingency provisions are consistent with provisions in other urban areas.

10. Comment

A commenter stated that the MVEB must reflect the significant contribution of mobile and freight emissions in the Detroit region and include a strong margin of safety; periodic downward adjustments, and alignment with regional emission reduction goals.

Response:

The motor vehicle emissions budgets (MVEB) were developed with the modeling assistance of the Southeast Michigan Council of Governments (SEMCOG) and in consultation with the transportation interagency workgroup members. On-road and non-road emissions projections are determined based on the results of different interconnected computer models that account for many variables including fuel type, vehicle type and age,

vehicle miles traveled, and federal air quality mobile source regulations. Emissions projections developed from modeling outputs for both on-road and non-road vehicles show significant decreases in emissions from both on-road and non-road mobile sources over the course of the interim and maintenance years (2035 and 2040, respectively). These emissions projections incorporate assumptions imbedded and input into the mobile source models. Safety margins are used to account for the uncertainty of projecting future emissions and provide flexibility in transportation planning. Projected emissions and safety margins included in the addendum both represent a decrease in emissions over the course of the study period.

11. Comment

One commenter suggested several additions to the addendum including:

- Independent third-party review
- Annual celebrations, public reporting, and hearings that lift-up improved public health in Michigan
- Mandatory corrective actions if benchmarks are not met
- A public portal where all comments of this public hearing and the EGLE responses are available to be viewed online
- Ozone transport from upwind sources contributes to southeast Michigan's air quality challenges. The addendum should quantify interstate contributions using USEPA tools and submit to regional collaboration and regulatory action where necessary.

Response:

In response to the suggestion to complete an independent third-party review of the addendum, EGLE opened a public comment period for input from the public on the draft addendum on March 23, 2026, which closed at 11:59 p.m. on April 22, 2026. This public comment period is required under 40 CFR, Part 51, Appendix V. The USEPA does not require states to complete a separate independent third-party review outside of the required public comment period for SIP documents. Additionally, in response to the request for a public portal for comments received and EGLE responses, the public comments received during the public comment period and responses from EGLE are included in Attachment B.

As mentioned above, a public comment period and hearing was held for this addendum.

The AQD within EGLE is fundamentally dedicated to protecting public health and the environment. We fulfill this mission by responsibly implementing and enforcing established health-based standards. This addendum to our 2022 Request for Redesignation represents a milestone worth celebrating, as it highlights southeast Michigan's success in meeting the 2015 ozone health-based standard.

In response to the request for corrective actions if benchmarks are not met, within the 2022 Request for Redesignation are contingency provisions that include measures to address ozone concentrations that exceed established criteria. This addendum does not address the contingency measures included in the 2022 Request for Redesignation.

Lastly, EGLE agrees that the transport of ozone from upwind sources contributes to the air quality in Michigan. Interstate transport is not an element required by USEPA to be included in a redesignation request or maintenance plan. Included below is information on a SIP revision EGLE submitted which addresses interstate pollution transport.

In March 2019, EGLE submitted to the USEPA a SIP revision in order to satisfy the infrastructure requirements pertaining to the 2015 ozone NAAQS, that contained a section that addressed interstate pollution transport pursuant to Section 110(a)(2)(D)(i) of the CAA. On February 13, 2023, USEPA promulgated a final rulemaking that finalized the disapproval of submissions for 19 states regarding interstate transport, including Michigan's SIP. In June 2023, the USEPA enacted a Federal Implementation Plan, known as the Good Neighbor Plan (GNP), that was implemented to serve in place of the interstate transport SIPs that were previously disapproved earlier that year and limit emissions of ozone precursors from upwind sources that were found to have been contributing to ozone nonattainment and maintenance problems in downwind states. In June 2024, the United States Supreme Court issued an opinion granting emergency applications brought by four sets of parties for a stay of the GNP pending completion of judicial review. In response to the judicial stay order, the USEPA issued a set of three final rules aimed at implementing the Supreme Court's order by further temporarily amending the GNP to administratively stay the effectiveness of its requirements for covered facilities. On January 27, 2026, the USEPA signed a proposal to approve SIP submissions from Alabama, Arizona, Kentucky, Minnesota, Mississippi, Nevada, New Mexico, and Tennessee addressing the CAA's interstate transport requirements for the 2015 ozone NAAQS. That proposed action was the first step in following through on the USEPA's March 2025 announcements to work with states on SIPs to improve air quality and reconsider the GNP. That was the first action taken as part of the USEPA's reconsideration of the GNP and its associated SIP actions. The USEPA intends to take additional steps to further reconsider the GNP and additional states impacted by that rule.

12. Comment

Commenters request that EGLE not reduce or eliminate ozone-related (VOC and NOx) rules and reduction programs.

Response:

In the 2022 Request for Redesignation, EGLE commits to maintaining control measures for

VOC and NOx emissions that were contained in the SIP before redesignation of the southeast Michigan area to attainment.

13. Comment

Commenters request that EGLE withdraw and not move forward with the addendum as the Sixth Circuit Court of Appeals vacated the USEPA's 2023 redesignation of the southeast Michigan area.

Response:

Because the USEPA's 2023 redesignation to attainment was vacated in February 2026, EGLE worked with the USEPA and determined that the preparation of this addendum is an appropriate step forward in attainment of the 2015 ozone standard.

14. Comment

Several commenters expressed concern over size of the monitoring network and stated that it should be expanded in southwest Detroit and near concrete batch plants and crushing facilities that are adjacent to neighborhoods. Additionally, a commenter expressed concern over the location of the Oak Park air monitor, as it is far from their home.

Response:

Ozone is a regional pollutant and formed in the presence of NOx, VOCs, and sunlight. Often the highest concentrations of ozone are downwind of major emission sources. Thus, high ozone levels will not normally be found where NOx and VOCs are emitted from the most intense sources due to so-called "NOx titration," wherein NO destroys ozone by temporarily converting it to NO_2, but rather at some distance from those pollution sources. For most of EGLE's ozone monitors, a monitoring station is representative of a larger geographic area.

The funding that EGLE receives from the USEPA for our ozone monitoring network must be used to meet the requirements in the ozone regulations. There are many requirements for types and number of monitors in a high population area. In Southeast Michigan, EGLE has sited twice the number of ozone monitors required by the USEPA.

This addendum focuses on ozone and its precursors of NOx and VOCs. The main emissions from concrete batch and crushing facilities are particulate matter and metals and therefore do not apply to the addendum.

15. Comment

Commenters asked what air monitoring data were used in the addendum and stated that the ozone levels in southeast Detroit and at the East 7 Mile monitor have been at or above the

ozone standard for a long time.

Response:

EGLE presented air monitoring data collected from the seven ozone state air monitoring sites in the southeast Michigan area. The data was fully certified within the official USEPA Air Quality System and accounted for exceptional event demonstrations for which the USEPA has officially concurred. A clean data determination, stating that the area achieved attainment of the 2015 ozone standard, was published in the Federal Register for the 2020 - 2022 period (88 Federal Register 32584). This addendum further shows that the area continues to meet the 2015 ozone standard based on certified monitoring data along with concurrence of the exceptional event demonstrations that EGLE has submitted to the USEPA.

16. Comment

A commenter indicated that stronger permitting requirements are needed for new and modified sources.

Response:

EGLE is meeting the federal CAA requirements related to permitting under Section 182(b)(5) through implementation of permitting offset ratios for ozone precursors, NOx and VOCs, at the moderate level of 1.15 to 1 within the nonattainment new source review permitting rules, Part 19 of the MAPCR. Additionally, NOx and VOCs are regulated for major sources and major modifications through the permitting program under the MAPCR Part 18. Prevention of Significant Deterioration of Air Quality; Part 19. New Source Review for Major Sources Impacting Nonattainment Areas; and Part 7. Emission Limitation and Prohibitions – New Sources of Volatile Organic Compounds Emissions. Specifically, R 336.1702 requires new sources of VOC emissions to meet, at a minimum, reasonably available control technology, or better.

17. Comment

A commenter stated:

“The Clean Air Act (Act) does not allow for reconsideration of a failed request for redesignation. EPA’s May 19, 2023, approval of EGLE’s January 3, 2022, request for redesignation of the southeast Michigan ozone nonattainment area was vacated by the United States Court of Appeals for the Sixth Circuit on December 5, 2025… the Court’s mandate issued on February 24, 2026. This decision is binding on EPA; therefore, EPA cannot reconsider its vacated May 19, 2023, approval, and EGLE’s January 3, 2022, request cannot be approved by EPA. If EGLE wishes to request redesignation, it must

make an entirely new request, and that request must satisfy all five statutory criteria for redesignation, including implementation of RACT, before EPA can redesignate the area to attainment."

Response:

EGLE worked with the USEPA to determine a path forward to attainment for the southeast Michigan area after the USEPA's 2023 redesignation was vacated. Per conversations with the USEPA, the preparation of this addendum was determined to be an appropriate step forward in attainment of the 2015 ozone standard.

18. Comment

A commenter discussed the Administrative Procedures Act and the CAA and how a mechanism for reconsideration of the vacated redesignation would not be available by either. Additionally, they state that even if the USEPA could reconsider the 2022 Request for Redesignation the USEPA would have to deny the request as it does not satisfy the requirements listed in CAA Section 107(d)(3)(E). Specifically:

- The USEPA must assess whether the redesignation request meets the requirements of Section 107(d)(3)(E) at the time of the USEPA's action on the request.
- Michigan did not satisfy the statutory criteria at the time of the USEPA's prior action and still has not satisfied them.
- Michigan's past and speculative future actions on RACT do not satisfy the applicable requirements for the nonattainment area.

Response:

As discussed above, EGLE worked with the USEPA to determine a path forward to attainment for the southeast Michigan area after the USEPA's 2023 redesignation was vacated. Per conversations with the USEPA, the preparation of this addendum was determined to be an appropriate step forward in attainment of the 2015 ozone standard.

19. Comment

A commenter stated that the southeast Michigan area is not currently attaining the ozone standard.

Response:

At the time that the draft document was created, four monitoring sites had DVs above the 70 ppb 2015 ozone NAAQS, however the air quality in southeast Michigan had been impacted by smoke entering the region from wildfires in Canada during 2023 and 2025. Due to this influence, EGLE has completed additional Exceptional Event (EE)

demonstrations for southeast Michigan. In February 2026, EGLE submitted to the USEPA an EE demonstration regarding impacts to the Allen Park and Detroit – East 7 Mile monitoring sites. The USEPA concurred with the EE demonstration on March 24, 2026. Additionally, another EE demonstration submittal for the Oak Park and Port Huron monitoring sites was developed and submitted to the USEPA in April of 2026. If the USEPA concurs with the EE demonstration, the data from Oak Park, and Port Huron monitoring sites for the impacted days will be excluded from ozone season calculations for southeast Michigan 2023 through 2025 DVs. With the exclusion of the data the DVs will be at or below the 2015 ozone NAAQS.

20. Comment

A commenter stated that Michigan must develop and implement a basic inspection and maintenance (I/M) program.

Response:

As set forth in the CAA Section 182(b)(4), the deadline for implementing the vehicle I/M requirements has not yet occurred. EGLE is actively working with the USEPA to determine specific requirements and the due dates for such requirements related to a vehicle I/M program.

21. Comment

A commenter stated that the emissions inventory is not correct.

Response:

As discussed above, EGLE worked with the USEPA to determine a path forward to attainment for the southeast Michigan area after the USEPA's 2023 redesignation was vacated. Per conversations with the USEPA, the preparation of this addendum was determined to be an appropriate step forward in attainment of the 2015 ozone standard. Because this is an addendum to EGLE's 2022 Request for Redesignation, the emissions inventory from the 2022 Request for Redesignation was not updated to the most recent year, but portions of the 2019 emissions inventory were updated per guidance from the USEPA.

22. Comment

A commenter stated that the maintenance plan relies on stale information. Specifically, the commenter stated the emissions inventory, the projected emissions inventory, the maintenance demonstration, and the MVEB are all invalid.

Response:

Refer to the comment above for a response associated with the claim that the emissions inventory is invalid. EGLE disagrees that the 2019 emissions inventory is invalid. The projected emissions inventories are based on the 2019 emissions inventory, and EGLE also disagrees that the projected emissions inventories and the MVEB are invalid. As this is an addendum to the 2022 Request for Redesignation EGLE needed to update the maintenance year to 2040, as well as update the MVEB to the year 2040, to provide the USEPA with time to review this request and reconsider the 2022 Request for Redesignation. EGLE worked with the USEPA to determine appropriate projected emission inventories and MVEB. Additionally, EGLE followed guidance provided by the USEPA to calculate the projected emission inventories with linear projections using conservative rates of change.

23. Comment

Four comments were received in support of the addendum.

Response:

Thank you for your comment.

Public Comments Received:

158 individual public comments, representing 168 commenters, were received during the virtual public hearing and/or via electronic mail.

- 139 commenters used a template or form in their email submittals. Of those comments, 75 comments were identical and so for brevity, one example will be included in this appendix.

Public comments are included below.

Archived: Thursday, April 30, 2026 10:18:07 AM
From: Karll, Kelly C
Sent: Wednesday, April 22, 2026 3:05:04 PM
To: Shuff, Erica (EGLE)
Cc: Karll, Kelly C
Subject: SEMCOG Public Comment-Draft Addendum Ozone Redesignation
Importance: Normal
Sensitivity: None
Attachments: SEMCOGPublicComment.EGLE.OzoneRedesignation2026.pdf;

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Erica,

Attached please find SEMCOG's public comment regarding the Draft Addendum to the Request for Redesignation to Attainment for the 2015 ozone NAAQS for Southeast MI Nonattainment Area.

Thanks,
Kelly

Kelly Karll, PE
Manager, SEMCOG Environment & Infrastructure
Direct: (313) 324-3375|karll@semcog.org
Subscribe to SEMCOG's Environmental Exchange

SEMCOG
1001 Woodward Avenue, Suite 1400
Detroit, MI 48226
Main: 313-961-4266
Visit: www.semcog.org

Slow down, and be a champion for Safe Streets in Southeast Michigan

April 22, 2026

Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division – SIP Development Unit
Attn: Erica Shuff
P.O. Box 30260
Lansing, MI 48909-7760

Via email: ShuffE@Michigan.gov

Re: Support for Draft Addendum — Redesignation to Attainment for the 2015 Ozone NAAQS, Southeast Michigan

Dear Ms. Shuff:

SEMCOG, the Southeast Michigan Council of Governments, appreciates the opportunity to comment on the *Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard (NAAQS) and Revision to Michigan's State Implementation Plan (SIP) and Ozone Maintenance Plan for the Southeast Michigan Ozone Nonattainment Area* released for public comment on March 23, 2026.

SEMCOG supports the Draft Addendum and requests that the U.S. Environmental Protection Agency reconsider and redesignate the seven-county Southeast Michigan area to attainment for the 2015 ozone NAAQS, together with the associated maintenance plan revisions. As the Metropolitan Planning Organization (MPO) for Livingston, Macomb, Monroe, Oakland, St. Clair, Washtenaw, and Wayne counties, SEMCOG ensures federally funded transportation plans, programs, and projects conform to Michigan SIP and Clean Air Act requirements.

Southeast Michigan continues to attain the 2015 ozone NAAQS based on multiple years of quality-assured and complete ambient monitoring data. The Draft Addendum appropriately updates the attainment demonstration with certified data extending through recent ozone seasons and explanation of how exceptional event influences were evaluated consistent with EPA requirements.

Specifically, the Addendum documents:

- Quality-assured ozone data and design values for the regional monitoring network (Tables 1 and 2), including treatment of Canadian wildfire smoke consistent with EPA's exceptional-events framework.
- Regionally observed air quality improvements reflecting long-term, structural reductions in ozone precursors, including cleaner vehicle fleets and sustained state and federal controls.

Gwen Markham, *Chairperson, Commissioner, Oakland County*
Laura Kropp, *First Vice Chairperson, Mayor, City of Mount Clemens*
Anne Marie Graham-Hudak, *Vice Chairperson, Supervisor, Canton Township*
Joe LaRussa, *Vice Chairperson, Mayor, City of Farmington*
Diana McKnight-Morton, *Vice Chairperson, Trustee, Washtenaw Community College*
Frank Viviano, *Vice Chairperson, Supervisor, Macomb Township*
Amy O'Leary, *Executive Director*

SEMCOG supports the Draft Addendum's transportation-related SIP elements, including:

- Updated on-road emissions inventories and projections for 2019, 2035, and 2040 developed using EPA's MOVES5 model and regionally derived travel demand data.
- Revised Motor Vehicle Emissions Budgets (MVEBs) for NOx and VOCs for 2035 and 2040, including safety margins developed through interagency coordination.
- A maintenance plan horizon extended through 2040 that demonstrates continuing downward trends in regional emissions while accommodating reasonable growth.

The on-road emissions analysis included as Attachment A shows continued declines in NOx and VOC emissions even as regional travel demand increases, supporting the maintenance demonstration. SEMCOG recognizes the December 5, 2025, decision of the U.S. Court of Appeals for the Sixth Circuit and appreciates EGLE's transparent approach in developing this Draft Addendum in response.

The updated record demonstrates continued attainment, updated maintenance planning, and conformity-related analyses appropriate for EPA redesignation. From the MPO perspective, clarifying regional status through a complete and updated administrative record is critical for consistency between demonstrated air quality performance and transportation conformity obligations. Redesignation to attainment, together with an approved maintenance plan, supports:

- Predictability and stability for long-range transportation plans and Transportation Improvement Programs subject to conformity;
- Efficient delivery of safety, mobility, and transit projects critical to public welfare; and
- Continued protection of public health through enforceable maintenance commitments contained in the SIP.

SEMCOG supports these outcomes while recognizing that SIP-approved control measures and contingency provisions remain in effect to ensure ongoing compliance. For the reasons described above, SEMCOG supports EGLE's Draft Addendum and encourages:

1. Finalization of the SIP revisions following consideration of public comments; and
2. EPA approval of the reconsidered request to redesignate Southeast Michigan to attainment for the 2015 ozone NAAQS, together with approval of the associated maintenance plan, emissions inventories, and MVEBs.

SEMCOG looks forward to continuing coordination with EGLE, EPA, and regional partners to maintain clean air and improved quality of life while advancing regional planning outcomes that benefit residents, local governments, and the broader Southeast Michigan economy. Thank you for the opportunity to comment.

Respectfully submitted,



Amy O'Leary, CAE
Executive Director

Archived: Thursday, April 30, 2026 10:14:22 AM
From: [redacted]
Mail received time: Sat, 18 Apr 2026 21:52:31
Sent: Saturday, April 18, 2026 5:52:32 PM
To: Shuff, Erica (EGLE)
Subject: Smog in Southwest Detroit
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Thank you for allowing these comments once again in this long fight to clean up the dust and smog here in Southwest Detroit.

Since before 2009, I have been driving and breathing the thick dirt fog that occurs daily on Livernois between Toledo and Federal and Otis due to the Detroit Intermodal Freight Terminal Livernois-Junction Yard, 2725 Livernois, Detroit, MI, 48209, co-owned by Norfolk Southern and CSX Corporation. An environmental assessment study completed in 2009 was grossly in error as it is not possible to live across from that dirt yard with huge semis entering and leaving it all day every day with windows of the houses and businesses encrusted with multiple coats of the filthy dirt that coats them and is impossible to clean, and the air a constant dustball except when it rains or snows, and not have any significant health or safety impacts! Norfolk Southern and CSX must be mandated to cover up all unpaved roads and piles of dirt, and trucks must be able to have their tires power-washed upon entering and exiting the yard. In addition, there must be a way to canvas the residents and businesses along Livernois' east side and up to 1500 feet from the facility, for health and home mitigation needs, as soon as possible. It's only the least a good neighbor, in good faith, should do! It is shameful that it takes enforcement to get it done!

Thank you for your attention to this significant environmental impact quality of life issue for thousands of Southwest Detroit families and businesses.

Sincerely,

[redacted]

Archived: Thursday, April 30, 2026 10:08:54 AM
From: Mike Witkowski
on behalf of: Mike Witkowski
Sent: Wednesday, April 22, 2026 3:34:43 PM
To: Shuff, Erica (EGLE)
Subject: Comments on SIP Revision - MMA
Importance: Normal
Sensitivity: None
Attachments: Outlook-batekqms.png; Outlook-cbrupfqj.png; MMA Draft Addendum Public Comment 4.22.26.pdf;

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

This message was sent securely using Zix®

Erica,

Please find attached MMA's Public Comment in support of EGLE's Draft Addendum.

Thank you,

Mike

Mike Witkowski | **Director of Environmental and Regulatory Policy** | **Michigan Manufacturers Association**
620 S. Capitol Ave ● Lansing Michigan ● 48933
Tel: 517.487.8543 | **Email:** witkowski@mimfg.org
Connect on Facebook | Connect on LinkedIn





This message was secured by Zix®.

Michigan Manufacturers Association

Erica Shuff
Air Quality Division
Michigan Department of Environment, Great Lakes, and Energy
P.O. Box 30260
Lansing, Michigan 48909-7760

Submitted via email to ShuffE@Michigan.gov

Support for Draft Addendum to Request for Redesignation to Attainment

April 22, 2026

Dear Erica Shuff:

I am writing on behalf of the Michigan Manufacturers Association (MMA) to submit comments in support of the Michigan Department of Environment, Great Lakes, and Energy's (EGLE) draft Addendum to the State Implementation Plan requesting redesignation of Southeast Michigan to attainment for the 2015 ozone National Ambient Air Quality Standard.

Manufacturing remains the largest sector of Michigan's economy, generating more than $112 billion in annual economic output and supporting over 600,000 jobs statewide. These are high-quality careers, with average annual compensation of $104,000. Manufacturing serves as the foundation for communities across the state, and the skilled men and women employed in this sector depend on policies that support a competitive and stable environment for long-term growth.

Regulatory programs should be grounded in accurate data and applied consistently with legal requirements. MMA appreciates EGLE's data-driven work in preparing this Addendum and its clear presentation of air monitoring results and emissions inventories. These elements support a showing of continued attainment consistent with the approved maintenance plan and the redesignation request. Ensuring that air quality decisions reflect actual observed air quality conditions is essential to maintaining the integrity of Michigan's air quality programs

EGLE's Addendum demonstrates that Southeast Michigan continues to meet the 2015 ozone standard based on consecutive years of quality-assured ambient monitoring data collected across the regional monitoring network. The monitoring record reflects appropriate data completeness and provides a reliable basis for evaluating continued attainment, consistent with EPA requirements. The Addendum clearly explains the methodologies applied and identifies those determinations requiring EPA concurrence as part of the redesignation process.

A key element of the Addendum is EGLE's analysis of ozone exceedances influenced by Canadian wildfire smoke. EGLE's technical demonstration establishes that these exceedances were driven by extraordinary, non-local wildfire impacts and are not representative of typical regional ozone conditions or meteorological patterns. The Addendum applies a clear conceptual model, establishes a weight-of-evidence technical record demonstrating causation, and distinguishes event-influenced concentrations from normal summertime ozone patterns across Southeast Michigan monitors. Consistent with the EPA Exceptional Events Rule, the wildfire impacts were neither reasonably controllable nor preventable. Excluding the affected data is therefore consistent with EPA's framework for ensuring attainment determinations are based on data that are representative and consistent with regulatory requirements. When these exceptional impacts are appropriately excluded, the monitoring record demonstrates that Southeast Michigan meets the 2015 ozone standard.

EGLE's Addendum and supporting analyses establish a clear and credible record demonstrating continued attainment. These findings support the statutory criteria for redesignation, including meeting the ozone standard, an approved State Implementation Plan, and continued maintenance under the Clean Air Act. Progression toward redesignation is consistent with the Act's requirement that air quality determinations be based on accurate, representative data and proper application of EPA's regulatory framework. MMA supports EGLE's submittal and is encouraged by this advancement toward redesignation based on clear and consistent data.

Sincerely,



Mike Witkowski
Director of Environmental and Regulatory Policy
Michigan Manufacturers Association

Archived: Thursday, April 30, 2026 10:09:26 AM
From: [redacted]
Mail received time: Wed, 22 Apr 2026 21:49:55
Sent: Wednesday, April 22, 2026 5:49:56 PM
To: Shuff, Erica (EGLE)
Cc: [redacted]
Subject: Comments on SIP Revision
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

My question -

Why has EGLE decided to disregard EPA's designation of the ozone levels in Detroit?

What data were used to justify the decision?

[redacted]

Sent from AOL on Android

Archived: Thursday, April 30, 2026 10:09:30 AM
From: Lisa Del Buono
Sent: Wednesday, April 22, 2026 5:47:25 PM
To: Shuff, Erica (EGLE)
Subject: Comments on SIP Revision
Importance: Normal
Sensitivity: None
Attachments: MiCCA written comment to EGLE regarding SE Michigan's Ozone Addendum.pdf;

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Please see the attached comments from Michigan Clinicians for Climate Action (MiCCA),

Thank you,
Lisa

--
Elizabeth (Lisa) Del Buono, MD
Founder & Board Chair
Michigan Clinicians for Climate Action (MiCCA)
Traverse City, MI
231-499-9197

By the way, I'm sending this at a time that works for me, but I only expect you to respond when it's convenient for you. :)

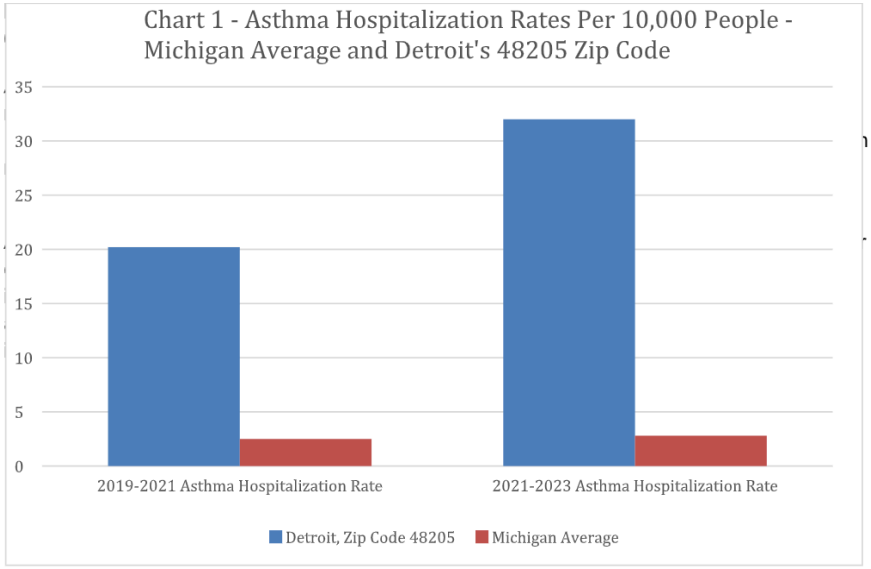
Comment to EGLE:
Southeast Michigan's Ozone Addendum
4/22/26

My name is Dr. Elizabeth Del Buono, MD. I am writing on behalf of Michigan Clinicians for Climate Action (MiCCA), a network of more than 450 healthcare professionals across the state, including many in Southeast Michigan, advocating for climate solutions that are also health solutions. I practiced medicine in Michigan for over 30 years.

I respect EGLE's mission to protect public health through responsible management of our air, water, land, and energy resources. However, I am deeply concerned by EGLE's repeated efforts to redesignate Southeast Michigan as in attainment for ozone, despite a federal court decision finding otherwise.

Rather than continuing to spend time in court, a more effective approach would be to reduce emissions of ozone precursors from major sources such as heavy traffic and industry.

Ground-level ozone, regardless of its source, is a dangerous air pollutant that triggers asthma and worsens respiratory disease. In Detroit, asthma hospitalization rates are already at least five times higher than in the rest of the state, and recent years have seen a troubling increase beyond that already elevated baseline.



hospitalizations per 10,000 people:[5]

Michigan Department of Health and Human Services, Age-Adjusted Asthma Hospitalization Rate per 10,000 Residents by Zip Code for Michigan and Detroit, 2021-2023

Ozone pollution also has lasting, lifelong consequences. A few summers ago, I traveled to Washington, D.C. with a young woman who grew up in Southeast Detroit. When we arrived, the weather was hot and humid. We had limited time to reach our conference, and I set off quickly. Despite being more than 40 years younger, she could not keep pace—she had to stop repeatedly, clutching her chest and struggling to breathe as she reached for her inhaler. I slowed down, carried her bags, and we continued this way throughout the trip.

It was clear to me that she carries the legacy of air pollution in her body—an impact she will live with for the rest of her life.

We know why this happens. Children's lungs are not fully developed at birth, and chronic exposure to air pollution stunts airway growth, leading to smaller lungs and reduced lung function. Elevated ozone levels are also linked to preterm birth, stillbirth, and certain birth defects. Even small increases in ozone are associated with higher rates of school absences and impaired cognitive development.

How can we turn our backs on families raising children in Southeast Michigan? Isn't protecting these children central to EGLE's mission?

According to the American Lung Association's *2026 State of the Air* report, released today, Wayne County once again received a failing grade for both ozone and particulate matter, and the Detroit metropolitan area ranks among the 25 most polluted cities in the nation.

Ozone levels across the country have been rising in recent years, driven in large part by more frequent climate-related wildfires, along with increasing heat and humidity. Wildfire smoke is no longer an "exceptional event"—it is becoming a recurring, and largely uncontrollable, feature of Michigan summers.

We cannot prevent climate-driven wildfires in Canada, at least not until we make a full transition away from fossil fuels. But EGLE can act now by developing a maintenance plan that reduces emissions of ozone precursors from major, controllable sources such as transportation and industry.

Now is the time to realize EGLE's vision that respects people and fosters thriving communities. The people of Southeast Michigan are telling you they are sick, and the data confirm that ozone levels remain dangerously high.

With respect, I urge you to forgo this misguided effort to designate Southeast Michigan as "in attainment for ozone" and instead focus on meaningful actions to reduce this harmful pollutant.

Thank you.

Archived: Thursday, April 30, 2026 10:09:36 AM
From: Marc Horvath
Sent: Fri, 17 Apr 2026 17:09:37
To: Shuff, Erica (EGLE)
Subject: Comments on SIP Revision
Importance: Normal
Sensitivity: None
Attachments: Letter EGLE Southeast Michigan Ozone Redesignation.pdf;

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Hello,

I am submitting this public comment on behalf of Wayne County Executive Warren Evans, regarding the Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard and Revision to Michigan's State Implementation Plan and Ozone Maintenance Plan for Southeast Michigan Ozone Nonattainment Area. Please let me know if you have any questions.

Best,

Marc Horvath, MPH
Policy Analyst
Department of Health, Human & Veterans Services
500 Griswold, Ste 1000
Detroit, MI 48226
313-224-7305
www.WayneCountyMI.gov

Warren C. Evans
Wayne County Executive



Opposition to Redesignation of Southeast Michigan to Attainment for Ozone

From: Warren C. Evans, Wayne County Chief Executive
To: Michigan Department of Environment, Great Lakes, and Energy (EGLE) – Air Quality Division
Re: Addendum Request to Redesignate Southeast Michigan to Attainment for the 2015 Ozone NAAQS
Date: April 17, 2026

Dear EGLE Air Quality Division,

I write on behalf of Wayne County to strongly oppose any redesignation of Southeast Michigan back to attainment for ozone at this time. The region is currently back in moderate nonattainment following the Sixth Circuit's mandate this winter, which returned the seven-county area to nonattainment after the court vacated EPA's prior redesignation. That outcome matters because the Clean Air Act's redesignation test is not just about a momentary snapshot of the monitors; it requires attainment, a fully approved implementation plan, permanent and enforceable emissions reductions, a maintenance plan, and satisfaction of all applicable statutory requirements.

Reliance on Wildfire Data Exclusions Raises Serious Concerns

EGLE's addendum also shows how fragile this redesignation effort is. The request depends in part on excluding wildfire-smoke-influenced ozone readings from the record at multiple monitors, including Allen Park, Detroit-East 7 Mile, Oak Park, and Port Huron. EGLE states that if EPA concurs with those exceptional-event demonstrations, the area's design values would fall to or below the standard, and the region would again become eligible for redesignation. In other words, the proposal is not a clean, durable demonstration that residents are breathing healthier air day after day; it is a request that hinges on removing pollution spikes from the compliance calculation. Removing those spikes from the compliance calculation does not remove them from the real world: residents living in areas affected by the spikes still have to breathe the poisonous air during these smoky days.

Ozone Pollution Has Clear and Documented Health Consequences

This questionable calculation methodology is especially troubling because ozone is not a harmless pollutant. The EPA says even relatively low levels of ozone can harm health, inflame and damage the airways, worsen asthma and chronic bronchitis, and increase asthma attacks. The EPA also states that higher daily ozone concentrations are associated with increased hospital admissions and increased daily mortality. Ozone is formed when nitrogen oxides and volatile organic compounds react in sunlight, which means the emissions from industrial facilities and motor vehicles remain directly relevant to whether Southeast Michigan truly deserves a return to attainment.

The public health stakes are not abstract. The Michigan Department of Health and Human Services reports the Detroit region's asthma hospitalization rate was 16.8 per 10,000 people for 2021–2023, compared with 2.8 per 10,000 statewide. EPA and the American Lung Association both recognize that ozone is especially harmful for children, older adults, people with asthma and other lung disease, low-income communities, and people who work or exercise outdoors. In a county already carrying a heavy respiratory burden, weakening ozone controls would risk more missed school days, more emergency visits, and more preventable suffering.

Wayne County Residents Face Disproportionate Cumulative Pollution Exposure

Wayne County residents do not start from a level playing field. EGLE's own MiEJScreen tool shows portions of Wayne County, specifically in Detroit, Dearborn and Downriver communities consistently score above the 90th percentile on the overall screening score, the environmental conditions score, and the ozone-specific score. This demonstrates that people living in these communities are subjected to a disproportionate amount of environmental pollution, thus impacting residents' abilities to lead healthy, successful lives. Lifting ozone-related protections now would further burden communities already living near highways, industrial corridors, and other pollution sources, further exacerbating the existing inequalities these communities face. This reality reinforces why EGLE and the EPA should consider cumulative pollution exposure and community environmental conditions when making these regulatory decisions rather than examining each decision in a vacuum, an approach that bears little reality to real-world circumstances.

Wayne County has made this point before in opposing premature redesignations for other pollutants: when monitoring and modeling do not reflect the full cumulative burden of pollution, loosening oversight is premature and leaves residents exposed. This poses an even stronger concern here because ozone is a regional pollutant formed by emissions from industry and transportation, and because the area's recent attainment claim has already been undone by the courts. EGLE should not ask the EPA to restore attainment until Southeast Michigan has demonstrated sustained compliance without relying on extraordinary exclusions, has fully met all remaining Clean Air Act requirements, and has shown that the protections needed to safeguard vulnerable communities are actually in place.

For these reasons, Wayne County urges EGLE to withdraw this request or, at minimum, to defer any redesignation until the region can demonstrate durable, equitable, and fully lawful attainment based on real-world conditions—not on selective exclusions that understate the air pollution residents continue to breathe.

Sincerely,

Warren C. Evans
Wayne County Executive

Archived: Thursday, April 30, 2026 10:09:41 AM
From: JAMES M. WALKER
Sent: Friday, April 17, 2026 3:29:13 PM
To: Shuff, Erica (EGLE)
Cc: Kathryn R. Ross
Subject: Consumers Energy Comments on Draft Addendum for SE Michigan Ozone Redesignation
Importance: Normal
Sensitivity: None
Attachments: CE Comments - Addendum to Request for SEMI Redesignation to Attainment Final.pdf;

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Hello Erica:

Thank you for the opportunity to provide the attached comments on the above subject. Please reach out to me or Kate if you have any questions.

Jim

James M. Walker
Environmental Quality & Sustainability –Air Quality Section Manager
C: 517-416-8008

Consumers Energy
Count on Us

April 17, 2026

EGLE – Air Quality Division
Attn: Erica Shuff - SIP Development Unit
P.O. Box 30260
Lansing, Michigan 48909-7760

Sent via email: ShuffE@Michigan.gov

Subject: Comments on Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard and Revision to Michigan's State Implementation Plan and Ozone Maintenance Plan for Southeast Michigan Ozone Nonattainment Area document

Dear Ms. Shuff,

Consumers Energy Company ("Consumers Energy") appreciates the opportunity to comment on the Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division's ("EGLE-AQD") draft document referenced above during the state's public comment period.

Consumers Energy is the principal subsidiary of CMS Energy Corporation and Michigan's largest combined gas and electric utilities, serving over six million of Michigan's ten million residents throughout the Lower Peninsula of the state. Consumers Energy has four (4) natural gas compressor stations located within the seven-county Southeast Michigan nonattainment area for the 2015 Ozone National Ambient Air Quality Standards (NAAQS). Furthermore, NorthStar Clean Energy, also a subsidiary of CMS Energy, has an existing electric generating facility located in the aforementioned ozone nonattainment area.

Consumers Energy monitors air quality policy and regulatory issues that affect not only our operations but also Michigan communities and the local economy. Consumers Energy supported the original redesignation to attainment request for the Southeast Michigan nonattainment area with comments submitted to EGLE-AQD and U.S. Environmental Protection Agency (EPA) on December 8, 2021, and April 19, 2022, respectively.

Furthermore, Consumers Energy reviewed and submitted a letter of support on March 26, 2026, for EGLE-AQD's recent Wildfire Exceptional Event (EE) Demonstration document for two specific ozone monitors (i.e., Oak Park and Port Huron) located in the Southeast Michigan nonattainment area. While we did not specifically submit comments on EGLE's Wildfire EE Demonstration for Allen Park and Detroit – East 7 Mile monitoring sites, we concur and support EGLE-AQD's work with both these demonstrations that the identified exceptional event dates should not be included when EPA

Consumers Energy
1945 W. Parnall Road
Jackson, MI 49201

Environmental Quality & Sustainability

evaluates monitoring data for regulatory decision making due to transport of Canadian wildfire smoke on the specific dates identified in each of these documents. EGLE-AQD has shown with the exclusion of specific exceptional event data due to Canadian wildfires, the design values for all ozone monitors in the nonattainment area are, and continue to be, below the standard for the 2015 Ozone NAAQS. This is evidenced in EGLE-AQD's expansion of the monitoring data analysis beyond a three-year average, such that 2020 through 2025 ozone season data for all seven monitoring locations in the area demonstrate attainment with the standard (per Table 2 of document). It is therefore appropriate that the nonattainment areas be redesignated to attainment and as such will continue to be monitored pursuant the State Implementation Plan's (SIP's) Maintenance Plan.

We strongly believe it is in the best interest of Michigan to support EGLE-AQD's request for redesignation to attainment for the Southeast Michigan seven-county nonattainment area based on ***actual background ozone data*** that continues to meet the NAAQS.

Consumers Energy supports EGLE-AQD's preparation and submittal of the Addendum to the Request to Redesignate the Southeast Michigan Ozone Nonattainment Area to Attainment document to EPA.

Consumers Energy thanks you for your time and consideration of our comments. Should you have any questions or concerns, please do not hesitate to contact Kate Ross at kate.ross@cmsenergy.com or myself at james.walker@cmsenergy.com.

Regards,

James M. Walker

James M. Walker, P.E.
Air Quality Manager
1945 W. Parnall Road
Jackson, MI 49201
(517) 416-8008

CC. (electronic only): Jim Roush, Consumers Energy
Scott Sinkwitts, Consumers Energy

Archived: Thursday, April 30, 2026 10:09:44 AM
From: Nicholas Leonard
Sent: Wednesday, April 22, 2026 7:51:54 PM
To: Shuff, Erica (EGLE)
Subject: Comments Re. Southeast Michigan Ozone Addendum
Importance: Normal
Sensitivity: None
Attachments: 2026_04_22_Final_Comments on EGLE _Addendum.pdf; Exhibit 1 Detroit Ozone Redesignation Comments 4-27-22 FINAL.pdf;

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Hi Erica,

I'm attaching the comments submitted by the Great Lakes Environmental Law Center on behalf of numerous individuals and organizations here.

Nick Leonard
Executive Director
Great Lakes Environmental Law Center
4444 Second Avenue
Detroit, MI 48201
313-782-3372

April 22, 2026

Submitted via email to: ShuffE@michigan.gov

Erica Shuff
Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division
SIP Development Unit

Re: Public Comments – Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard and Revision to Michigan's State Implementation Plan and Ozone Maintenance Plan for Southeast Michigan Ozone Nonattainment Area ("Draft Addendum")

Dear Ms. Shuff,

Please accept these comments submitted by Great Lakes Environmental Law Center, Sierra Club, Air Law for All, Ltd., Michigan Clinicians for Climate Action, the 48217 Zip Code Air Monitoring Committee, Justice for Beniteau, the Asthma and Allergy Foundation of American- Michigan Chapter, the People's Water Board Coalition, Eden Bloom, Dr. Dolores Leonard, and Congresswoman Rashida Tlaib regarding the draft addendum to Michigan's redesignation request for the Southeast Michigan ozone nonattainment area.

EGLE's draft Addendum is yet another unfortunate addition to what is an already long and growing list of actions the Department has undertaken to avoid taking action to lower ozone pollution in Southeast Michigan. All the while, ozone pollution, particularly on the Eastside of Detroit, has been at or above the health-based ozone air quality standard for a decade. According to the Michigan Department of Health and Human Services, asthma hospitalization rates in the 48205 zip code – which is where the East 7 Mile ozone monitor is located – have increased by nearly 50% despite decreasing statewide. The asthma hospitalization rate in the 48205 zip code on Detroit's Eastside is the highest in Michigan.[1] These residents, who are predominantly Black and low-income, desperately need EGLE to take basic steps required by the Clean Air Act to protect their right to breathe safe air free of dangerous levels of ozone pollution. It can start by withdrawing its unlawful and deeply flawed draft Addendum and instead focus its efforts on lowering ozone pollution in Southeast Michigan as required by law.

Sincerely,

Nicholas Leonard
Executive Director
Great Lakes Environmental Law Center

[1] Michigan Department of Health and Human Services, Age-Adjusted Asthma Hospitalization Rate per 10,000 Residents by Zip Code for Michigan and Detroit, 2018-2020; Michigan Department of Health and Human Services, Age-Adjusted Asthma Hospitalization Rate per 10,000 Residents By Zip Code for Michigan and Detroit, 2021-2023.

I. EGLE's Characterization of Its Proposal Is Incorrect and Misleading

EGLE styles this proposed action as an "Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard."[2] The Addendum goes on to state: "[EGLE] requests the USEPA reconsider the Request for Redesignation for the southeast Michigan nonattainment area."[3]

The Clean Air Act (Act) does not allow for reconsideration of a failed request for redesignation. EPA's May 19, 2023 approval[4] of EGLE's January 3, 2022 request for redesignation of the southeast Michigan ozone nonattainment area was vacated by the United States Court of Appeals for the Sixth Circuit on December 5, 2025.[5] As explained by the Court, Michigan had not "met all requirements applicable to the area" at the time of redesignation, in particular the requirement to implement all reasonably available control technology (RACT).[6]

The Court's mandate issued on February 24, 2026.[7] This decision is binding on EPA; therefore, EPA cannot reconsider its vacated May 19, 2023 approval and EGLE's January 3, 2022 request cannot be approved by EPA. If EGLE wishes to request redesignation, it must make an entirely new request, and that request must satisfy all five statutory criteria for redesignation, including implementation of RACT, before EPA can redesignate the area to attainment.

A. The Administrative Procedure Act Does Not Provide A Mechanism for Reconsideration of the Vacated Redesignation

The Act provides two avenues for rulemaking: section 307 of the Act or the Administrative Procedures Act (APA). Section 307(d)(1) enumerates specific rulemakings that must follow the Act's procedures in section 307(d).[8] If not enumerated in section 307(d)(1), all other rulemaking actions under the Act must follow the general informal rulemaking procedures in the APA.[9]

Redesignations are not among the enumerated actions in section 307(d)(1), and EPA did not determine in the proposal or final action for redesignation that the catchall in section 308(d)(1)(N) should apply.[10] Thus, the general rulemaking procedures in section 505 of the APA apply.

---

[2] Michigan Department of Environment, Great Lakes, and Energy, Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard and Revision to Michigan's State Implementation Plan and Ozone Maintenance Plan for Southeast Michigan Ozone Nonattainment Area. At 1 (Mar. 2026) (hereinafter, "Draft Addendum").
[3] *Id.*
[4] 88 Fed. Reg. 32,594 (May 19, 2023).
[5] *Sierra Club v. U.S. EPA et al*. ("Sierra Club"), Nos. 23-3581/3583, slip op. at 21 (6th Cir. Dec. 5, 2025).
[6] *Id.* at 14-21.
[7] *Sierra Club*, Doc. No. 90 (Feb. 24, 2026).
[8] *Id.* § 7607(d)(1).
[9] 5 U.S.C. § 553. In general, agency actions not governed by specific statutory procedures are governed by the APA, but also note that this can be inferred from the final paragraph of section 307(d)(1). 42 U.S.C. § 7607(d)(1).
[10] *See PPG Industries, Inc. v. Costle*, 630 F.2d 462, 465 n.2 (6th Cir. 1980).

The APA's procedures do not provide for "reconsideration" of a rulemaking.[11] They do provide for a petition for the "issuance, amendment, or repeal" of a rule.[12] However, EGLE is not asking EPA to amend its previous rule regarding the previous redesignation request, because EPA approved that request, an approval that was ultimately vacated by the Sixth Circuit Court of Appeals. Instead, EGLE is submitting new information in an attempt to support a judicially overturned redesignation determination and asking EPA to 'reconsider' its request. At worst, EGLE is asking EPA to ignore the mandate issued by the Sixth Circuit Court of Appeals. At best, EGLE's request may be considered a new request for reconsideration, as discussed below.

B. The Procedures in the Clean Air Act Do Not Provide A Mechanism for Reconsideration of the Vacated Redesignation

The Act, in contrast with the APA, does expressly set forth procedures for a state to request redesignation and for EPA to consider the state's request. Under section 107(d)(3)(D), EPA must "approve or deny" a request for redesignation.[13] There is no procedure in section 107(d)(3)(D) for "reconsideration" of a request. Nor does EGLE cite any authority under the Act for EPA to reconsider its action.

Courts have recognized two limited circumstances in which an agency may have inherent authority to revisit a past action. One is where the agency has identified an error in that action,[14] and the other is where an agency has changed policy within the limits the statute places on such discretion.[15]

However, neither applies here. EGLE has not identified any EPA error in its March 23, 2023 action that, if corrected, would support redesignation.[16] Further, EPA's policy regarding the relevant date for determining the "applicable" requirements the state must meet prior to redesignation has been vacated by the Sixth Circuit as inconsistent with the plain language of the Act. That vacatur is binding on EPA, and EPA cannot revive its prior action even if it revisits this policy. Rather, EPA would need to make a fresh determination that the statutory criteria for redesignation are satisfied at the time of its final action.

C. EGLE Does Not Provide Any Grounds for Reconsideration Under Section 307(d)

Section 307(d)(7)(B) of the Act does provide for petitions for reconsideration of rulemakings that have been carried out under section 307(d)'s procedures. However, even if the Addendum could be understood as a petition for reconsideration under section 307(d)(7)(B), which it cannot for the reasons discussed in section I.A above, it would fail. Petitions for reconsideration are only authorized under section 307(d)(7)(B) if it was "impracticable" to raise the objection during the comment period or "if the grounds for such objection arose after the

[11] *See generally* 5 U.S.C. § 553.
[12] *Id.* § 505(e).
[13] 42 U.S.C. § 7407(d)(3)(A).
[14] *See, e.g.*, *Alabama Envt'l Council v. Adm'r, U.S. EPA*, 711 F.3d 1277, 1290 (11th Cir. 2013).
[15] *See, e.g.*, *FCC v. Fox Television Stations, Inc*., 556 U.S. 502 (2009).
[16] While EPA did err by relying on an interpretation of section 107(d)(3)(E(v) that was far from a best reading of that provision, *see Sierra Club* at 14-21, fixing that error would not support reconsideration; instead, it would defeat it, as explained below.

period for public comment (but within the time specified for judicial review)."[17] Neither applies here.

Impracticability under the first prong only applies when the final rule is not a "logical outgrowth" of the proposal.[18] It cannot apply to new circumstances that have arisen later, because that would swallow the second prong and render its text nugatory. Thus, impracticability does not apply here.

The second prong only can apply to new grounds that have arisen "within the time specified for judicial review." That period is long past;[19] therefore the second prong also does not apply here.

Furthermore, EGLE does not have any "objection" within the meaning of section 307(d)(7)(B) to EPA's original action; in fact, EGLE requested the original action. If anything, EGLE's objection is to the Sixth Circuit ruling, but the mandate for that has issued. EGLE, having failed to intervene in that case, cannot now seek to interject through unlawful means.

I. Even if EPA Could "Reconsider" Michigan's 2022 Redesignation Request, EPA Would Have to Deny the Request Because Michigan Has Not Satisfied the Requirements of Clean Air Act Section 107(d)(3)(E).

Because there are no grounds for reconsideration of EPA's May 19, 2023 approval of EGLE's request for redesignation, the Addendum must be understood as an entirely new request for redesignation, if anything. As a result, it needs to not only show that the five requirements for redesignation in section 107(d)(3)(E) are met, it must also show that EGLE has submitted all the elements of an approvable maintenance plan. Styling the proposed action as an "Addendum" and a "petition for reconsideration" obscures these requirements, which is also a failure of public notice.

A. EPA Must Assess Whether the Redesignation Request Meets the Requirements of Section 107(d)(3)(E) at the Time of EPA's Action on the Request.

The draft Addendum recognizes that redesignation to ozone attainment is permissible "provided certain criteria are met," and that those criteria are found in section 107(d)(3)(E) of the Clean Air Act.[20] This section contains five subsections, each of which must be assessed by EPA at the time EPA acts on the request for redesignation. Whether or not EGLE styles its request as a "reconsideration" or a fresh request for redesignation, the same five statutory criteria apply. As made clear by the Sixth Circuit, "the statutory requirements must be met at the time of redesignation."[21]

---

[17] 42 U.S.C. § 7607(d)(7)(B).
[18] *Alon Refining Krotz Springs Inc. v. EPA*, 936 F.3d 628 (D.C. Cir. 2019).
[19] *See* 88 Fed. Reg. at 32,614 (period for judicial review ended on July 18, 2023).
[20] Draft Addendum at 2.
[21] *Sierra Club v. EPA*, 161 F.4th 934, 948 (6th Cir. 2025).

Yet, the only criteria EGLE explicitly addresses in its addendum is the first: whether the area has attained, and continues to attain, the 2015 ozone NAAQS. (As discussed in section III, commenters dispute that air quality data supports this claim.) The draft Addendum omits any discussion of whether attainment is attributable to permanent and enforceable emissions reductions, as required by section 107(D)(3)(E)(iii),[22] and only obliquely addresses the fifth criterion as to whether "the state has met all requirements applicable to the area" 42 U.S.C. 7407(D)(3)(E)(v).[23] Before EPA can determine whether to redesignate the southeast Michigan ozone nonattainment area, Michigan must demonstrate that it meets each of the five criteria.

B. Michigan Did Not Satisfy the Statutory Criteria at the Time of EPA's Prior Action, and Still Has Not Satisfied Them

Even if EPA could "reconsider" Michigan's prior redesignation request such that it could consider whether the statutory requirements had been met at the time of its 2023 action, rather than whether they are currently being met, EPA would clearly need to deny the request. The Sixth Circuit expressly found that the 2023 redesignation was unlawful because it failed to satisfy 42 U.S.C. § 7407(D)(3)(E). Specifically, "Michigan never submitted SIP revisions addressing the additional RACT [Reasonably Available Control Technology] requirements for Moderate nonattainment areas" despite a deadline of March 1, 2023.[24]

Nor could EPA find in response to the Addendum that Michigan "has met all applicable requirements for the area."[25] Michigan has not yet remedied the deficiency found by the Sixth Circuit, as the state has not completed the RACT requirements for Moderate areas. EGLE states that it "is actively working with the USEPA to determine specific requirements and the due dates for RACT requirements."[26] However, RACT became an "applicable requirement" as of the March 1, 2023 deadline set by EPA when it reclassified the area from Marginal to Moderate nonattainment.[27] As made clear by the Sixth Circuit, EPA therefore cannot redesignate the area to attainment until EGLE proposes RACT rules for VOC and NOx sources, puts them through public comment, finalizes them, and submits them to EPA. "The EPA cannot . . . require RACT implementation by a certain date, and then ignore a state's failure to comply in assessing a redesignation request." *Sierra Club*, 161 F.4th at 951. Once EPA receives Michigan's RACT rules, it must fully approve them before making any redesignation determination.[28]

---

[22] As discussed in section III, this is particularly concerning given EGLE's heavy reliance on "exceptional" events in claiming that the area is in attainment.
[23] *See* Draft Addendum at 2-9.
[24] *See Sierra Club*, 161 F.4th at 941, 951.
[25] *Id.* § 7407(D)(3)(E)(v).
[26] Draft Addendum at 8.
[27] *See Sierra Club*, 161 F.4th at 951 (citing Finding of Failure to Attain and Reclassification of the Detroit Area as Moderate for the 2014 Ozone National Ambient Air Quality Standards, 88 Fed. Reg. 6,633, 6,634 (Feb. 1, 2023).
[28] 42 U.S.C. § 7407(d)(3)(E)(ii); *Wall v. EPA,* 265 F.3d 426, 430 (6th Cir. 2001) ("[t]o satisfy the second and fifth redesignation criteria, EPA must fully approve the applicable SIP in accordance with § 110 of the CAA.")

EGLE has provided no specifics in the Addendum as to the completion of the RACT requirements and has not provided an opportunity for the public to comment on the specifics of any anticipated SIP revisions intended to meet the Moderate area RACT requirement for Southeast Michigan. Accordingly, the Addendum cannot satisfy the requirements of Section 107(d)(3)(E)(v) and EPA must deny the request for redesignation as premature at best.

In addition, as discussed in section IV below, the state has not yet established a Basic Inspection/Maintenance Program for mobile sources of ozone precursor emissions. This omission would also preclude redesignation under Section 107(D)(3)(E)(v) if EPA determines at the time of its action that the state has failed to satisfy this applicable requirement.

C. Michigan's Past and Speculative Future Actions on RACT Do Not Satisfy the Applicable Requirements for the Area.

The draft Addendum does not assert that Michigan has met the applicable RACT requirements for the southeast Michigan area, nor does it include any supporting materials to demonstrate that Michigan has completed its RACT rules. It acknowledges that EGLE must issue RACT rules for "major sources and all sources in specified categories established through Control Techniques Guidelines," but only vaguely notes that "EGLE developed VOC RACT rules for past NAAs while developing attainment plans for the 1979, 1997, and 2015 ozone NAAQS," rather than citing any compliant rules.[29]

Although not included in this action's record, commenters are aware that EGLE issued revisions to its VOC emissions standards for source categories covered by a federal control technology guideline ("CTG"), and has also revised NOx emission standards for certain sources, in an effort to comply with the moderate area requirements. However, EGLE has not indicated that it has submitted these rules to EPA for approval into the Michigan SIP with respect to the southeastern Michigan nonattainment area, and even if it has, EPA has not yet acted on such rules.[30]

In order to satisfy EPA's standards for RACT emission limits, EGLE will need to show the emission limits it has selected reflect "the lowest emission limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility."[31] While EGLE cites sources' compliance with 1979 VOC RACT rules, this has no bearing on whether the state has met applicable requirements for RACT for a Moderate nonattainment area for the 2015 ozone NAAQS. Even if the 1979 RACT rules follow EPA's Control Techniques Guidelines (CTG) recommendations,

---

[29] Draft Addendum at 8.

[30] *See* U.S. EPA, *EPA Approved Regulations and Statutes in the Michigan SIP*, *at* https://www.epa.gov/air-quality-implementation-plans/epa-approved-regulations-and-statutes-michigan-sip

[31] Draft Addendum at 8; *see also* U.S. EPA, State Implementation Plans; Nitrogen Oxides Supplement to the General Preamble for the Implementation of Title I of the Clean Air Act Amendments of 1990, 57 Fed. Reg. 55,620, 55,624 (Nov. 25, 1992).

EGLE and EPA must evaluate whether the proposed standards are reflective of the latest technology.[32]

II. The Detroit Area Is Not Currently Attaining the Ozone NAAQS

Among the requirements for redesignation is that the area has attained the standard and continues to attain it at the time EPA acts on the request.[33] However, EGLE's own review of design values for the Detroit nonattainment area shows three monitors violating the standards for the 2023-2025 period.[34] The area therefore does not qualify for redesignation.

Nonetheless, EGLE states that it is requesting EPA exclude certain days as exceptional events to bring the design values into attainment.[35] However, EGLE fails to establish a clear causal relationship between the claimed exceptional events and the specific exceedances,[36] as will be shown by separate comments on the claimed exceptional events. EGLE itself has noted that it faces challenges in attaining the ozone standard and that downward ozone trends throughout Region 5 have flattened in recent years.[37] To the extent wildfire smoke is impacting ozone levels in Southeast Michigan, such impacts are often relatively minor compared to the impacts from local stationary and mobile sources.

Reliance on numerous exceptional events calls into question EGLE's demonstration of maintenance as well. Michigan has sought to exclude 14 days' worth of ozone data from four air quality monitors in the nonattainment area over the past four years.The linear projection method presumes that air quality will not violate the standards in the future if emissions stay below current levels. Additionally, one of the Act's key criterion for redesignation is that improvement in air quality must be "due to permanent and enforceable reductions in emissions resulting from implementation of the applicable implementation plan and applicable Federal air pollutant control regulations and other permanent and enforceable reductions."[38] But if it is necessary to rely on exceptional events to find that current air quality is below the standards, then perforce it is necessary to rely on expected exceptional events in the future to find that the standards will be maintained. This completely calls into question the "exceptional" nature of the events. It also calls into question whether Michigan has satisfied the criteria for redesignation, particularly since EGLE has consistently acknowledged that ozone trends throughout Region 5 have flattened

---

[32] *See Sierra Club v. EPA*, 972 F.3d 290 (3d Cir. 2020).
[33] 42 U.S.C. § 7407(d)(3)(E)(i).
[34] Draft Addendum at 4-5.
[35] Draft Addendum at 5.
[36] *See* 42 U.S.C. § 7619(b)(3)(B)(ii); 40 C.F.R. § 50.19(c)(3)(iv)(B); *see also id.* § 50.1(j) (definition of "exceptional event").
[37] Michigan Department of Environment, Great Lakes, and Energy , Key Findings and Policy Implications from the MOOSE Study, Apr. 22, 2024, available at https://www.michigan.gov/egle/-/media/Project/Websites/egle/Documents/Groups/AAC/Presentations/presentation-2024-04-23-AAC-MOOSE-Update.pdf?rev=95f5141ee2074d449bc09953ca9b47ce&hash=4FF3F2804737EDED19C9FFD0C4D134E6
[38] 42 U.S.C. § 7407(d)(3)(E)(iii).

in recent years.[39] At a minimum, EGLE must demonstrate the standards will be maintained absent future exceptional events.

Finally, EGLE is mistaken in stating that the area will qualify for redesignation if EPA approves the requested exceptional events.[40] The area does not meet all requirements for redesignation, specifically implementation of reasonably available control technology (RACT).

III. Michigan Must Develop and Implement a Basic Inspection/Maintenance (I/M) Program.

The Act requires states with moderate ozone nonattainment areas to develop SIP revisions that Include all provisions necessary to provide for a vehicle inspection and maintenance program.[41] Similar to RACT, EGLE only states that it "is actively working with the USEPA to determine specific requirements and the due dates for such requirements related to a vehicle I/M program."[42] Absent any of these specifics, Michigan's draft Addendum does not satisfy the Clean Air Act's requirements for basic I/M programs for several reasons.

While Michigan points to its existing vehicle inspection and maintenance program provided in Part 65 of the Michigan Natural Resources and Environmental Protection Act, this program is deficient in numerous respects. First, it only applies to Wayne, Oakland, and Macomb county, not the entirety of the seven-county ozone nonattainment area in Southeast Michigan.[43] Second, it specifies that the inspection and maintenance program shall only be implemented as a contingency measure under an EPA approved maintenance plan if there is an observation of an actual violation of the ozone standard during the maintenance period.[44] Michigan's SIP does not grant EGLE the authority to implement a basic I/M program throughout the seven-county Detroit nonattainment area. Additionally, Michigan has not satisfied several of the SIP submittal requirements for I/M programs, including a schedule for implementation, an analysis of emission level targets using the most current EPA mobile source emission model, a detailed discussion of each requirement design element, a description of the legal authority requiring implementation of the program, and evidence of adequate funding to implement all aspects of the program.[45]

IV. The Emissions Inventory Is Not Current

[39] *Supra,* fn. 36.
[40] Draft Addendum at 5.
[41] 42 U.S.C. § 7511a(b)(4).
[42] Draft Addendum at 9.
[43] MCL 324.6507(1).
[44] MCL 324.6507(2).
[45] 40 C.F.R. § 51.372(a).

As EGLE states by quoting section 172(c)(3) of the Act,[46] this redesignation request and maintenance plan must "include a comprehensive, accurate, *current* inventory of actual emissions."[47] However, EGLE proposes to use a 7-year-old emissions inventory from 2019.[48]

As justification, EGLE merely quotes unnamed[49] EPA guidance as stating: "[f]or O3 nonattainment areas, the inventory should be based on actual *typical summer day* emissions of O3 precursors...during the attainment year."[50] It appears that EGLE is quoting EPA's 1992 guidance for redesignation requests.[51] It is not clear how EGLE can reasonably consider 2019 as the "attainment year." If EGLE is taking it to mean the year of the attainment date, then that does not support using a 2019 emissions inventory. The original attainment date for the Marginal area was August 3, 2021.[52] The area failed to attain by that date, and by statute the new attainment date for the Moderate area was August 3, 2024.[53] Thus, under that reading of the guidance, the emissions inventory must be updated to 2024 at a minimum.

Furthermore, the EPA guidance must be read in context. The discussion of the emissions inventory in it starts:

> The State should develop an attainment emissions inventory to identify the level of emissions in the area which is sufficient to attain the NAAQS. This inventory should be consistent with EPA's most recent guidance on emission inventories for nonattainment areas available at the time and *should include the emissions during the time period associated with the monitoring data showing attainment.*[54]

A footnote states: "Where the State has made an adequate demonstration that air quality has improved as a result of the SIP …, the attainment inventory will generally be the actual inventory at the time the area attained the standard."[55] In the context of guidance for redesignation requests, this makes clear that by "attainment year," EPA means the year that the area is attaining the standard for the purposes of redesignation. Thus, the relevant period for the emissions inventory is at the earliest 2023-2025. Again, a 2019 emissions inventory is not current for that period.

---

[46] Addendum at 9.
[47] 42 U.S.C. § 7502(c)(3) (emphasis added).
[48] EGLE states that it "updated" the on-road emissions inventory for the 2019 inventory and reran the MOVES5 model with the "updated" inventory, Addendum at 9, but EGLE does not state that it was estimating emissions for any more recent year. Thus, it appears the EGLE merely revised the 2019 inventory and did not update it.
[49] Quoting unnamed guidance is both bad form and inadequate public notice.
[50] Draft Addendum at 9 (emphasis in original).
[51] "Procedures for Processing Requests to Redesignate Areas to Attainment," Memorandum from John Calcagni, Director, Air Quality Mgmt. Div., U.S. EPA ("Calcagni Memorandum") at 8 (Sep. 4, 1992).
[52] 88 Fed. Reg. 6,633, 6,634 (Feb. 1, 2023).
[53] *Id.*
[54] Calcagni Memorandum at 8.
[55] *Id.* at 8 n.5.

Finally, EPA guidance cannot overcome plain statutory language. An emission inventory from 2019 is not "current" under any reasonable interpretation of the word, and as a result it is also likely that the emissions inventory is neither comprehensive nor accurate.

This failure to update the emissions inventory is particularly problematic as EGLE is required to submit an annual emissions inventory and a comprehensive triennial emissions inventory to EPA.[56] Thus there is no excuse for using a 7-year-old emissions inventory. EGLE must use a current emissions inventory that reflects current emission trends post-COVID.

By itself, this is a fatal flaw for EGLE's proposal. It also renders EGLE's maintenance plan invalid.

V. The Maintenance Plan Relies on Stale Information

As discussed above, the maintenance plan relies on an invalid emissions inventory. This issue infects other elements of the maintenance plan. The projected emissions inventories are also invalid, and therefore the demonstration of maintenance is invalid, as are the motor vehicle emission budgets (MVEBs).

The projected emissions inventories are even more dubious than the current emissions inventory, because for sources other than on-road, they rely on a linear projection from 2016 inventories out to 2035 and 2040.[57] While linear projection is recommended in EPA's redesignation guidance, that is based in part on an assumption that an appropriate base year will be used for the emissions inventory, ensuring that linear projection will go no further than 10 years into the future.

Furthermore, EGLE relies on EPA emissions modeling that only goes to the year 2032 and that was prepared for use with photochemical grid modeling (CMAQ and CAMx).[58] There is nothing in EPA's technical support document (TSD) that indicates it is appropriate to extend these projections *beyond* 2032.[59]

In addition, EGLE fails to explain why EGLE relies on linear interpolation in its projection of maintenance when EGLE uses inventories developed for photochemical grid modeling. "[P]hotochemical modeling is the most scientifically rigorous technique to determine NOx and/or VOC emissions reductions needed to show attainment of the NAAQS and is readily

---

[56] 40 C.F.R. § 51.30(a), (b).
[57] Draft Addendum at 11.
[58] "Technical Support Document (TSD): Preparation of Emissions Inventories for the 2016v2 North American Emissions Modeling Platform," Office of Air Quality Planning and Standards at 1 (Feb. 2022), *available at* https://www.epa.gov/system/files/documents/2022-02/2016v2_emismod_tsd_february2022.pdf.
[59] *See generally id.* EGLE is therefore in error when it states that its 2040 projected emissions inventory was calculate through "a linear interpolation *between* the modeling platform's analytic year inventories of 2016 and 2032." Addendum at 11 (emphasis added).

available."[60] At a minimum, EGLE is required to consider existing modeling results from the use of this data.

Use of stale information also gives reason to doubt EGLE's choice of contingency measures for the maintenance plan. EGLE does not discuss contingency measures at all in the Addendum, but it is not possible to select a rational set of contingency measures without accurately knowing the set of emission sources that might be reasonably controlled.

While EPA previously approved an ozone maintenance plan, that approval was premised on an assumption that the demonstration of maintenance was for an appropriate 10-year period, namely 2025-2035.[61] EGLE itself recognizes this in the Addendum by creating new projections for 2040. Thus, EPA's previous approval is of no consequence.

Furthermore, as instructed by the Sixth Circuit opinion, the use of the present perfect in section 107(d)(3)(E)(v) requires Michigan to meet all Part D requirements—including requirements for an accurate, comprehensive, and current emissions inventory and other maintenance plan requirements—at the time EPA acts on a redesignation request. That EPA has previously approved a maintenance plan a few years ago is not relevant to current requirements. Additionally, as more fully described in the previous comments submitted to EPA regarding EGLE's previous redesignation request, EGLE's ozone maintenance plan for Southeast Michigan suffered from a number of deficiencies, including unclear and lenient warning and action levels, vague contingency measures, and inadequate authority to adopt and implement emissions control measures to address future attainment problems.[62]

[60] 83 Fed. Reg. 62,998, 63,004 (Dec. 6, 2018).
[61] *See, e.g.,* 88 Fed. Reg. 32,594, 32,595 (May 19, 2023) (stating that maintenance of the ozone NAAQS for the period 2025-2035 has been demonstrated).
[62] *See* Sierra Club, Great Lakes Environmental Law Center, et al. Comments on Proposed Redesignation of the Detroit, MI Area to Attainment of the 2015 Ozone Standards, Docket No. EPA-R05-OAR-2020-0730, at 20-25 (attached hereto as Exhibit 1).

Sierra Club ● Great Lakes Environmental Law Center ● Asthma & Allergy Foundation of America, Michigan Chapter ● Michigan Environmental Justice Coalition ● Detroit Green Skills Alliance ● MI Air MI Health ● Ecology Center ● League of Michigan Bicyclists ● Michigan Clinicians for Climate Action ● Citizens' Climate Lobby, Detroit Metro North Chapter ● Great Lakes Renewable Energy Association ● McLouth Waterfront Alliance ● Moms Clean Air Force, Michigan Chapter ● Detroit Greenways Coalition ● Clean Water Action ● Michigan United ● Detroit People's Platform ● Detroit Hamtramck Coalition for Advancing Healthy Environments ● Environmental Law and Policy Center ● Natural Resources Defense Council ● Michigan League of Conservation Voters

April 27, 2022

Eric Svingen
Attainment Planning and Maintenance Section
Air Programs Branch (AR-18J)
Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, IL 60604

Via Regulations.gov

Re: Proposed Redesignation of the Detroit, MI Area to Attainment of the 2015 Ozone Standards, Docket No. EPA-R05-OAR-2020-0730

Dear Mr. Svingen,

On behalf of Sierra Club, Great Lakes Environmental Law Center and the nineteen other Detroit and Michigan-based groups listed above, we submit these comments on EPA's proposal to redesignate the Detroit ozone nonattainment area to attainment and to approve Michigan's maintenance plan for the area.[1] We urge EPA not to finalize its proposal at this time. Redesignation would prematurely halt the state planning process for reductions of ozone precursors such as nitrogen oxides (NOx) and volatile organic compounds (VOCs) to ensure permanent improvements in air quality. EPA bases its proposal on monitored ozone concentrations from 2019-2021, but fails to show that ozone pollution will remain below the National Ambient Air Quality Standard (NAAQS) rather than being a temporary downward blip due to cooler temperatures and higher humidity. Furthermore, Michigan's maintenance plan is not sufficient to keep the Detroit area in attainment: it does not include specific measures to

[1] *Air Plan Approval; Michigan; Redesignation of the Detroit, MI Area to Attainment of the 2015 Ozone Standards*¸87 Fed. Reg. 14,210 (March 14, 2022).

control pollution in the event of new ozone readings above the NAAQS, and it does not require action until more than 18 months after such reading.

EPA points to federal rules that it hopes will ensure a long-term downward trajectory in ozone pollution, but fails to persuasively link these rules to specific impacts in Southeast Michigan or to identify enforceable, permanent reductions that caused the recent reduction in ozone pollution levels. As a result, EPA's assurances that those levels will remain below the NAAQS over the next ten years ring hollow. Especially in the context of the severe asthma burden already experienced by environmental justice communities in and around Detroit, EPA must not rush to declare the area's ozone problem solved without a solid basis in evidence. Doing so would be arbitrary and contrary to law, and would contradict the agency's stated commitment to environmental justice.

Though we appreciate EPA's commitment that it will not finalize the proposal "if the design value of a monitoring site in the area violates the NAAQS prior to final approval of the redesignation,"[2] it appears that EPA could finalize its proposal in the middle of this year's ozone season, thus risking the chance that the area could slip back into nonattainment within mere weeks of redesignation. EPA's action could jeopardize public health by unnecessarily delaying needed air quality planning requirements and permanent attainment for the area.

I. Background

A. Southeast Michigan Nonattainment Designation

The Clean Air Act ("Act") is intended to protect and enhance the public health and public welfare of the nation. *See* 42 U.S.C. § 7401(b)(1). Accordingly, the Act requires EPA to promulgate primary and secondary NAAQS for "criteria" pollutants, which include ozone. *Id.* § 7409. EPA must establish the primary NAAQS at levels "the attainment and maintenance of which . . . are requisite to protect the public health." *Id.* § 7409(b)(1) (emphasis added). Areas not meeting EPA's primary ozone NAAQS are required to attain the standard "as expeditiously as practicable," but in no event later than time frames set forth in Section 181 of the Act. *Id.* § 7511(a)(1) (emphasis added).

On October 1, 2015, EPA promulgated a revised 8-hour ozone NAAQS of 0.070 parts per million (ppm).[3] Upon promulgation of a new or revised NAAQS, section 107(d)(1)(B) of the Act requires EPA to designate as nonattainment any areas that are violating the NAAQS, based on the most recent three years of quality assured ozone monitoring data.

[2] 87 Fed. Reg. at 14,212.
[3] *National Ambient Air Quality Standards for Ozone*, 80 Fed Reg. 65,292 (October 26, 2015).

EPA failed to meet its October 2017 statutory deadline for completing ozone nonattainment area designations for the 2015 NAAQS, and was sued by a coalition of states and environmental and public health groups to enforce the Act's deadline. Under a court-ordered timetable, EPA finalized the designations in April 2018.[4] EPA designated a seven-county area in southeast Michigan as a Marginal nonattainment area for the 2015 ozone NAAQS.[5] However, EPA delayed in publishing the rule in the Federal Register for over a month, resulting in further delay of the rule's effective date. The designations were finally published on June 4, 2018, and were effective as of August 3, 2018.[6]

To show attainment of the 2015 ozone NAAQS in an area, the state must provide quality-assured data that the 3-year average of the annual fourth highest daily maximum 8-hour average concentration (i.e., the "design value") is equal to or less than 0.070 ppm, when truncated after the thousandth decimal place, at all of the ozone monitoring sites in the area.[7] The 3-year ozone design value for 2019–2021 at the monitor the Michigan Department of the Environment, Great Lakes, and Energy (EGLE) has selected to represent the design value for the nonattainment area (East 7 Mile Road in Detroit) is exactly 0.070 ppm.

For an area with an attaining design value to be redesignated as attainment, the state must, among other requirements, demonstrate that the "improvement in air quality is due to permanent and enforceable reductions in emissions resulting from implementation of the applicable implementation plan and applicable Federal air pollutant control regulations and other permanent and enforceable reductions." 42 U.S.C. § 7407(d)(3)(E)(iii). EPA has interpreted this statutory requirement to require States seeking an attainment redesignation to "reasonably attribute the improvement in air quality to emissions reductions which are permanent and enforceable" as opposed to temporary reductions in emissions due to adverse economic conditions or unusually favorable meteorology.[8] In addition, EPA must approve a maintenance plan for the area that "provide[s] for the maintenance of the national primary ambient air quality standard for each

---

[4] *Additional Air Quality Designations for the 2015 Ozone National Ambient Air Quality Standards*, 83 Fed. Reg. 25,776, 25, 779 (June 4, 2018) (noting court-ordered April 30, 2018 deadline); *see also* EPA, Additional Designations for the 2015 Ozone Standards, https://www.epa.gov/ozone-designations/additional-designations-2015-ozone-standards.

[5] 83 Fed. Reg. at 25,813.

[6] *Id*. at 25,776. The delay in publishing allowed Michigan to permit a new gas plant in St. Clair County, one of the counties in the nonattainment area, without applying nonattainment New Source Review, even though EPA had already identified the county for nonattainment. The plant has the potential to emit 238 tons of NOx annually.

[7] 87 Fed. Reg. at 14,211 (citing 40 CFR 50.19 and appendix U to 40 CFR part 50).

[8] J. Calcagni, EPA Dir. Of Air Quality Mgt. Div. Procedures for Processing Request to Redesignate Areas to Attainment, (Sept. 4, 1992), https://www3.epa.gov/ttn/naaqs/aqmguide/collection/cp2/19920904_calcagni_process_redesignation_guidance.pdf.

pollutant in the area concerned for at least 10 years after the redesignation." 42 U.S.C. § 7505a(a); 42 U.S.C. § 7407(d)(3)(E)(iv).

Because the Detroit area failed to achieve attainment by August 3, 2021, three years after the effective date of the nonattainment designation, EPA recently proposed to find that the Detroit area failed to attain the 2015 ozone NAAQS by its attainment date.[9] If that determination were finalized, the area would be reclassified to Moderate nonattainment by operation of law, triggering new requirements for state implementation plan (SIP) submissions that apply to Moderate areas.[10]

B. Ozone Pollution and Its Disproportionate Impacts in Southeast Michigan

Ozone is not emitted directly into the air but is formed when NOx and VOCs, known as "ozone precursors," react in the presence of sunlight.[11] Such emissions contribute to peak ozone formation during hot, dry, stagnant summertime conditions. In Michigan, the ozone season extends from March 1 through October 31.[12] Higher ozone levels are associated with increases in asthma medication use, the number of asthma hospitalizations, and risk of death.[13] Ozone exposure can cause a number of health problems, including chest pain, coughing, throat irritation, and congestion. Breathing ozone inflames and damages the airways, reduces lung function, and continues to damage the lungs even after symptoms have disappeared. Ozone also makes the lungs more susceptible to infection and repeated exposures may permanently scar lung tissue. These effects lead to increased school and work absences, emergency department visits, hospital admissions, and reliance on medication.[14]

---

[9] *Id.* at 14,212, n. 3.

[10] *Id.* EPA does not consider Moderate area requirements applicable requirements for purposes of its redesignation of the area to attainment because at the time Michigan submitted its request (January 2022), EPA had not yet determined that the area failed to attain, and the due dates for SIP submissions related to the failure to attain would fall even further in the future. *See id.*

[11] U.S. EPA, Ground Level Ozone, www.epa.gov/groundlevelozone/.

[12] EGLE, Annual Ambient Air Monitoring Network Review (July 1, 2021), attached as Exhibit 1, https://www.michigan.gov/documents/egle/ambient-monitoring-network-review-2021-07-01_729037_7.pdf, at 25.

[13] S.B. Khatri, F.C. Holguin, et al, *Association of ambient ozone exposure with airway inflammation and allergy in adults with asthma*, The Journal of Asthma: Official Journal of the Association for the Care of Asthma, 46(8), 777–785 (2009).

[14] *See, e.g.*, U.S. EPA, National Ambient Air Quality Standards for Ozone; Final Rule, 73 Fed. Reg. 16,436, 16,440 (Mar. 27, 2008); *see also* U.S. EPA, Integrated Science Assessment for Ozone and Related Photochemical Oxidants, EPA 600/R-10/076F (Feb. 2013), www.epa.gov/ncea/isa/ozone.htm (cataloguing scientific studies and discussing in depth the wide range of adverse health effects associated with short- and long-term ozone exposure); U.S. EPA, Policy Assessment for the Review of the Ozone National Ambient Air Quality Standards, EPA-452/R-14-006 (Aug. 2014), at 4-57.

Ozone is particularly dangerous for those who already suffer from respiratory illnesses because, for instance, it can worsen asthma, emphysema, and chronic bronchitis. Sensitive populations such as children and the elderly are also especially susceptible to the negative health effects of ozone and are far more likely to be hospitalized for asthma.

The adverse effects of ozone pollution on children's health are compounded by the fact that children's lungs are still developing and because children are more likely than adults to be active outdoors, especially at midday and during the afternoon when ozone pollution levels are at their peak, and, thus, face greater exposure risk. EPA has an obligation to ensure that its regulatory actions address the disproportionate risks to children that result from environmental health threats.[15]

The latest data on asthma in the Detroit area illustrate that there is no time to waste in addressing ozone pollution. Detroit has experienced one of the worst increases in asthma rates among both adults and children in the last five years. Moreover, Detroit faces a disproportionate asthma burden compared to the rest of the state. As found by the Michigan Department of Health & Human Services, "the asthma burden in Detroit was found to be greater than the overall asthma burden in Michigan."[16] Between 2016-2021, asthma rates were 46% higher in Detroit than in the rest of Michigan.[17] Even more concerning is the fact that the asthma burden in Detroit appears to be worsening. In 2016, the asthma rate for adults in Detroit was 15.5% compared to Michigan's 11%.[18] In 2021, the asthma rates in Detroit adults jumped to 16.2% while Michigan stayed nearly the same at 11.1%.[19] Disparities in asthma hospitalization rates in Detroit compared to the rest of Michigan are also worsening. In a 2008 study, the Michigan Department of Community Health found that asthma hospitalization rates in Detroit were three times higher than the rates in Michigan as a whole.[20] In 2021, the Michigan Department of Health and Human Services found that the rate of asthma hospitalizations was at least four times greater for Detroit residents than Michigan residents as a whole.[21]

---

[15] Exec. Order No. 13045, Protection of Children from Environmental Health Risks and Safety Risks, 62 Fed. Reg. 19,885 (Apr. 21, 1997).
[16] P. Kunyangna & B. Anderson, *Detroit: The current status of asthma burden, 2021 update*. Michigan Department of Health & Human Services (2021), at 2, https://www.michigan.gov/documents/mdhhs/Detroit-AsthmaBurden-2021_Update_748381_7.pdf.
[17] *Id*.
[18] C. Thompson, *Detroit's longtime problem with asthma is getting much worse. Why that's concerning*. The Detroit News, April 5, 2022, https://www.detroitnews.com/story/news/local/detroit-city/2022/04/05/asthma-detroit-worse-health-services-report/7059301001/.
[19] *Id.*
[20] E.A. Wasilevich, S. Lyon-Callo, et al., Bureau of Epidemiology, Michigan Department of Community Health, *Detroit – The Epicenter of Asthma Burden, Epidemiology of Asthma in Michigan*, 2008, https://www.michigan.gov/documents/mdch/14_Ch12_Detroit_Epicenter_of_Asthma_276687_7.pdf
[21] *See* Kunyanga & Anderson, *supra* note 16.

As discussed further below, Detroit is, by any measure, an environmental justice community, and thus requires particular attention and protection from EPA. "Environmental justice" is defined as the "the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies."[22] Environmental justice principles require EPA to address the disproportionate impacts of toxic pollutions on marginalized communities of Black, Latinx, indigenous peoples and other people of color.

The burden of ozone pollution's impact in Southeast Michigan is borne disproportionately by people of color, especially Black adults and children. In 2019, the rate of asthma hospitalizations for Black residents in Detroit was more than three times the rate for Whites.[23] The racial disparities are also abundantly evident throughout Wayne and Washtenaw counties. In Wayne County (including Detroit and other cities), 31.9 per 10,000 Black children were hospitalized due to asthma attacks compared to 5.8 of 10,000 White children.[24] Similarly, in Washtenaw County, 45.1 per 10,000 Black children were hospitalized for asthma attacks compared to 11.4 per 10,000 White children.[25] Black and other marginalized communities have been disproportionately impacted by increased asthma rates as a result of toxic air pollutions. These findings demonstrate that a delay in achieving permanent attainment for ozone would disproportionately harm Black communities; it is imperative that EPA not rush its decision.

II. EPA Should Not Rush to Designate the Detroit Area as Attainment When the Existing Data Leaves No Room for Error and the Consequences Are Significant

A. Even a relatively mild ozone season in 2022 could push the area back into nonattainment

As noted in Table 1 of the EPA's proposal to determine that the Detroit nonattainment area is attaining the 2015 ozone National Ambient Air Quality Standard, air quality monitors in Southeast Michigan have detected concentrations of ozone that result in a 3-year ozone design value that is either just below or equivalent to the NAAQS of 0.070 ppm.[26] The margin for NAAQS compliance is particularly thin in St. Clair and Wayne County, where ozone monitors

[22] EPA, Environmental Justice, https://www.epa.gov/environmentaljustice.
[23] Michigan Department of Human & Health Services, *MICHIGAN ASTHMA ATLAS: Prevalence, Hospitalization, & Mortality by Counties & Regions among Michigan Adults & Children*. (February 2019), https://www.michigan.gov/documents/mdhhs/MI_Asthma_Atlas_2019_653258_7.pdf (attached hereto as Exhibit 2).
[24] *Id.*
[25] *Id.*
[26] 87 Fed. Reg. at 14,211.

have detected concentrations that result in a 3-year ozone design value of 0.070 parts per million, which is equivalent to the NAAQS.[27]

At the St. Clair County monitor, if 2022's fourth-highest daily maximum 8-hour average is 0.071 ppm, then the area would once again be in nonattainment with the ozone standard. Notably, this means that the fourth-highest daily maximum 8-hour average could *decrease* from 0.072 ppm in 2021 to 0.071 ppm in 2022 and the area would *still* be in nonattainment regardless of the decrease in ozone concentrations.

At the Wayne County monitor at East 7 Mile Road in Detroit, if 2022's fourth-highest daily maximum 8-hour average is 0.070 ppm, then the area would once again be in nonattainment with the ozone standard. A similar situation is present at both the Oakland County ozone monitor and the Macomb County ozone monitor at New Haven.

In short, even a relatively mild ozone season in Southeast Michigan in 2022 could trigger nonattainment findings in four counties. Due to the multiple, variable factors that contribute to ozone formation, ozone concentrations can vary significantly from year to year. This is demonstrated by the range in the fourth-highest daily maximum 8-hour ozone concentrations for 2019, 2020, and 2021. In order to approve a redesignation request, EPA must find that the improvement in air quality is "permanent" and the result of "enforceable reductions to emissions."[28] Given the unpredictability of ozone formation, the thin margin of error, and the lack of a detailed analysis establishing a causal connection between the reduction of emissions and reduced ozone concentrations in 2019, 2020, and 2021, we do not believe there is a sufficient basis for the EPA to determine that the reduction in ozone satisfies the requirement in 42 USC 7407(d)(3)(E)(iii).

B. The available monitoring data does not show a steady downward trend

While EPA accepts Michigan's prediction that the NAAQS will be maintained through 2035 based on projection of emissions of VOC and NOx for the Detroit area that remain at or below 2019 emission levels,[29] the actual monitoring data before EPA do not give confidence that reductions in 2021 were part of a steady trend towards attainment. The fourth highest reading *increased* at every monitor in the area between 2019 and 2020 except for the monitor in St. Clair County (Port Huron), with readings as high as 0.074 ppm in Macomb and Oakland counties and as high as 0.073 ppm in Wayne County. The fourth highest reading for the Port Huron monitor increased between 2020 and 2021. Moreover, the East 7 Mile monitor in Wayne County has exceeded 0.070 ppm in 9 out of the last 11 years and had a 3-year average above the NAAQS in

[27] *Id.*
[28] 42 USC 7407(d)(3)(E)(iii).
[29] 87 Fed. Reg. at 1428.

five out of the last six years.[30] Likewise, shifting just one year prior from the three years relied upon EPA, the 2018-2020 design values show nonattainment at half of the monitors in the nonattainment area.[31] In short, there is no reason to believe from the available monitoring data that the 2019-2021 design value will be representative of future ozone concentrations. Nor has EPA provided other persuasive data to counter the monitoring data's indication that ozone violations remain a persistent problem in the Detroit area, as discussed further below.

C. An attainment designation could delay achieving and maintaining attainment long-term

EPA's decision to redesignate the area would prematurely halt ongoing planning efforts to reduce NOx and VOCs within the nonattainment area and in other contributing areas. Both EGLE and Lake Michigan Air Directors Consortium (LADCO) have been involved in studying control measures and have identified concrete opportunities to reduce emissions from the many NOx and VOC polluters in the area.[32] Without a nonattainment designation, the state will face no obligation to select or implement any of these control measures to assure ozone levels are maintained below the NAAQS.

Sierra Club and others have also identified pollution control improvements at facilities within the nonattainment area that could bring air quality improvements. For example, the Monroe coal-fired power plant is the largest single source of NOx emissions in the state emitting 15,219 tons annually, along with 256 tons of VOCs.[33] Air quality expert Joe Kordzi analyzed the NOx emissions of the Monroe coal-fired power plant in the context of comments on EGLE's regional haze plan and found that the performance of Monroe Unit 1's Selective Catalytic Reduction equipment ("SCR") has been gradually worsening over the years.[34] Because of the lax NOx limit in Monroe's existing permit, there is not currently a requirement that the SCR operate at its

---

[30] EGLE, 4th Highest Maximum 8-Hour Ozone Concentration Per Year and 3-Year Average (updated Mar. 15, 2022) (attached hereto as Exhibit 3)

[31] EGLE, Annual Ambient Air Monitoring Network Review (July 1, 2021), at 26; *see also id.* at 27 (Figure 4).

[32] EGLE, Ozone Nonattainment, https://www.michigan.gov/egle/about/organization/Air-Quality/state-implementation-plan/ozone-nonattainment (describing ongoing planning); EGLE, Ozone Rule Planning Response, https://www.michigan.gov/egle/-/media/Project/Websites/egle/Documents/Programs/AQD/State-Implementation-Plan/non-attainment/Ozone/ozone-rule-tracking.pdf (listing potential new rules to reduce ozone precursors); LADCO, LADCO_Task2_control_measures_screening_deliverable_NAA_v3.xlsx (master list of point source NOx controls for the LADCO region); LADCO, Final Report: Control of Ozone Precursor Emissions in the Great Lakes Region, https://www.ladco.org/wp-content/uploads/Projects/Emissions-Controls/Ramboll-NOx-VOC-2020/FinalReport_LADCO_Ozone_Emissions_Control_29Jan2021.pdf.

[33] National Emissions Inventory 2014 Data, https://www.epa.gov/air-emissions-inventories/2014-national-emissions-inventory-nei-data.

[34] Joe Kordzi, A Preliminary Review of the Michigan Regional Haze State Implementation Plan (June 2021) (attached hereto as Exhibit 4) at 19.

maximum efficiency. Mr. Kordzi also found that it is likely any improvement needed to ensure consistency and an improved NOx removal efficiency would be very cost-effective.[35]

There are of course other large point sources of ozone precursors in the Detroit area, like the Marathon Refinery, which has the fourth highest emissions of VOCs in the state.[36] By redesignating the area to attainment, EPA will allow discussions about Reasonably Available Control Technology for the area's many industrial polluters, which would be required in a Moderate area nonattainment plan, to cease. Though similar discussions and planning might resume upon redesignation to nonattainment, there could be several years of delay in the meantime while excess ozone levels endanger public health. For example, even if EPA were to redesignate the area as nonattainment as soon as 2023, the state would then have three additional years (until 2026) to come back into nonattainment, delaying the schedule originally triggered by the current nonattainment designation by five years.[37] Moreover, whereas EPA's proposal to "bump up" the area to a Moderate designation would likely proceed to a final rule this year if EPA does not redesignate the area to attainment, that bump-up would no longer occur unless EGLE misses its new 2026 attainment date.

While other state or federal programs, such as Regional Haze, or the Good Neighbor Rule have the potential to bring much needed controls to the sources in the area that lack updated pollution controls, until such controls are included in a finalized SIP or federal implementation plan (FIP), EPA cannot count on them for "permanent, enforceable" reductions.

Ceasing progress to reduce ozone precursors will have the most significant impact on the areas where the greatest proportions of people of color live. The NOx and VOC emissions of Wayne County vastly exceed other those in other parts of the nonattainment area.[38]

III. EPA Must Consider the Environmental Justice Implications of its Action and Meaningfully Engage Impacted Communities

Whether EPA defines an environmental justice community with reference to race, income, or other socioeconomic or environmental factors, many areas of Detroit and the rest of the ozone nonattainment area would qualify. There are several available screening tools that provide information on environmental risk, socioeconomic and demographic factors, pollution burden, and other indicators of communities that face greater environmental risk and burdens than is

[35] *Id.*
[36] https://www.epa.gov/air-emissions-inventories/2014-national-emissions-inventory-nei-data.
[37] *See, e.g.*, EGLE, Comprehensive 2015 Ozone Planning Roadmap, https://www.michigan.gov/egle/-/media/Project/Websites/egle/Documents/Programs/AQD/State-Implementation-Plan/non-attainment/Ozone/ozone-attainment-2020-03-11-comprehensive-planning.pdf (setting deadline for selecting control strategies in 2021).
[38] 87 Fed. Reg. at 14,222 (Tables 6 and 7).

typical. Even while the specifics of some of these tools are still being considered, it is clear from these tools that EPA should consider many census tracts in the ozone nonattainment area as places of special concern for environmental justice issues.[39] In that light, EPA must take particular care in ensuring its decision does not adversely impact this area.

Executive Order 12898 provides that "[t]o the greatest extent practicable and permitted by law … each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States."[40] In addition, EPA's Final Guidance on Considering Environmental Justice During the Development of Regulatory Analysis and Technical Guidance for Assessing Environmental Justice in Regulatory Analysis provide staff with direction on how to incorporate environmental justice into regulatory decision making.[41] EPA has not followed this guidance in issuing the proposal for redesignation, particularly in the absence of eliciting "meaningful involvement" from within the impacted communities. As EPA's guidance notes, "[t]o provide meaningful involvement opportunities that are consistent with the Agency's definition of EJ, the rule-writers will likely need to go beyond the minimum requirements of standard notice and comment procedures and engage minority populations, low-income populations, tribes, and indigenous peoples early in the process."[42] Neither EGLE nor EPA appears to have affirmatively reached out to such populations before making this proposal.

EPA must also consider Title VI of the Civil Rights Act in evaluating the disproportionate consequences of prematurely approving EGLE's request for redesignation to attainment given the disproportionate asthma burdens in the area. Under EPA's Title VI implementing regulations, EGLE is prohibited from using "criteria or methods of administering its program which have the effect of subjecting individuals to discrimination because of their race, color, [or] national

---

[39] *See, e.g.*, MI EJ Screen (Draft), https://egle.maps.arcgis.com/apps/webappviewer/index.html?id=b100011f137945138a52a35ec6d8676f; CEQ Climate and Economic Justice Screening Tool (Beta), https://screeningtool.geoplatform.gov/en/#9.51/42.3536/-83.1688; EJ Screen, https://ejscreen.epa.gov/mapper/. (Maps and background information collected in Exhibit 5 hereto).

[40] Exec. Order No. 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, 59 Fed. Reg. 7,629 (Feb. 11, 1994); *see also* Executive Order 14008, Tackling the Climate Crisis at Home and Abroad (Jan. 27, 2021); Exec. Order No. 13985, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government (Jan. 20, 2021).

[41] U.S. EPA, Guidance on Considering Environmental Justice During the Development of Regulatory Actions (May 2015), https://www.epa.gov/environmentaljustice/guidance-considering-environmental-justice-during-development-action (hereinafter "2015 Guidance"); U.S. EPA, Technical Guidance for Assessing Environmental Justice in Regulatory Analysis (June 2016), https://www.epa.gov/sites/default/files/2016-06/documents/ejtg_5_6_16_v5.1.pdf. http://yosemite.epa.gov/ee/epa/eed.nsf/webpages/ejtg.html/$file/ejtg_draft.pdf.

[42] 2015 Guidance at 10.

origin."[43] EPA's Title VI implementing regulations include prohibitions against both intentional and unintentional discrimination by EGLE and other EPA funded agencies.[44] Unintentional discrimination includes those actions that have a disproportionate adverse effect on individuals of a certain race, color, or national origin. Despite not being formalized in writing, a neutral policy or decision understood as a "standard operating procedure," a failure to act, or a failure to proactively adopt an important policy can also constitute a violation of Title VI. Unintentional discrimination likewise can include the adverse effects of "cumulative impacts of pollution from a wide range of sources" that disproportionately affect individuals of a certain race, color, or national origin.[45]

Given the links between ozone pollution and asthma as well as the racial disparities regarding asthma burdens in Michigan, there is a significant risk of EPA's decision violating Title VI's prohibition against administering programs in a manner that has the effect of subjecting individuals to discrimination on the basis of race, color, or national origin. It's unclear how, if at all, EGLE or EPA accounted for Title VI requirements and ensured compliance in regards to this proposal.

IV. EPA Has Not Demonstrated that the Air Quality Improvements in the Nonattainment Area Are Due to Permanent and Enforceable Emission Reductions

EPA's finding that Michigan has demonstrate that the "improvement in air quality is due to permanent and enforceable reductions in emissions," 42 U.S.C. § 7407(d)(3)(E)(iii), is flawed and unsupported for the reasons discussed below.

A. EPA did not fully consider whether meteorological conditions were the cause of lower ozone concentrations

As noted by EPA, Michigan provided two analyses to demonstrate that the decrease in ozone concentrations was not due to unusually favorable meteorology.

First, EGLE conducted an analysis comparing 22 years of data collected at three monitors in the Detroit area with temperature data ("EGLE Analysis"). Specifically, the EGLE Analysis consisted of the following:[46]

[43] 40 CFR § 7.35(b).
[44] 40 CFR § 7.35.
[45] Draft Title VI Guidance for EPA Assistance Recipients Administering Environmental Permitting Programs, 65 Fed. Reg. 39,650 (June 27, 2000). Although the Draft Guidance is specifically for permitting activities, Title VI's principles also apply to EGLE's implementation of its duties to plan for and achieve attainment of the NAAQS.
[46] 87 Fed. Reg. at 14,217.

- Comparison of the maximum 8-hour ozone concentration at each monitor to the number of days where the maximum temperature was greater than or equal to 80 degrees Fahrenheit for the years 2000 to 2021;
- Examination of the relationship between average summer temperatures and the fourth-highest 8-hour ozone concentrations for the years 2000 to 2021;
- Number of days within an 8-hour average greater than 70 ppb compared to the number of days where the maximum temperature was greater than 80 degrees Fahrenheit for the years 2000 to 2021.

Second, EGLE provided an analysis performed by the Lake Michigan Air Directors Consortium ("LADCO Analysis"). This consisted of a classification and regression tree (CART) analysis that was conducted from 2005 through 2019. This analysis considered ozone data for five monitors in the metro-Detroit area and a number of associated meteorological variables. It concluded that the downward trend in ozone concentrations from 2005 to 2019 was due to improved air quality and not unusually favorable meteorology.[47]

In summarizing the two analyses, EPA noted that ozone concentrations have decreased substantially over the past two decades, and that these decreases are due to reductions in precursors and not unusually favorable meteorological conditions. Regarding the EGLE analysis, EPA notes that ozone concentrations have gone down as temperatures have increased.[48] EPA goes on to conclude that the reductions in ozone concentrations in the Southeast Michigan area are due to "reductions in ozone concentrations in the area, and not unusually favorable summer temperatures."[49] Regarding the LADCO study, EPA comes to a similar conclusion; that declining ozone concentrations over the for 14 year period examined supports the conclusion that air quality has improved due to downward trends in precursor emissions and not unusually favorable meteorological conditions.[50]

EPA's reliance on these studies to conclude that the decrease in ozone concentrations during the attainment period in question is not due to unusually favorable meteorology is unfounded. There is no doubt that, in general, ozone precursor emissions have decreased over the past two decades as noted by the studies and that, as a result, ozone concentrations have decreased. Given that the ozone NAAQS has decreased to 0.08 ppm in 1997, to 0.075 ppm in 2008, and to its current level of 0.070 ppm in 2015, such reductions are not only expected but required. While both of these analyses are focused on long-term trends in ozone concentrations in relation to meteorological conditions, what is relevant is whether unusually favorable meteorological conditions in the years 2019, 2020, and 2021 led to lower than normal ozone concentrations.

[47] *Id.*
[48] *Id.*
[49] *Id.*
[50] *Id.*

A variety of weather conditions play important roles in the formation of ozone. According to EPA, ozone is more readily formed on warm, sunny days when the air is stagnant and is more limited when it is cloudy, cool, rainy, or windy.[51] Temperature has long been known to be a key factor in the creation of ozone.[52] However, a number of other meteorological conditions other than temperature influence ozone formation as well. Stagnant conditions characterized by low wind speeds allow ozone concentrations to build up in a given area.[53] High levels of humidity also have a "scavenging effect" on ozone because higher levels of humidity are often associated with greater cloud cover and atmospheric instability, which can inhibit photochemical reactions and decrease ozone concentrations.[54]

Despite the complexity of the relationship between numerous meteorological factors and ozone creation and the razon thin margin of attainment, neither EGLE nor EPA have conducted any analysis of a number of meteorological conditions for the years 2020 and 2021. While the LADCO analysis incorporated a wide range of meteorological factors and their influence on ozone formation, it only did so for years 2005 through 2019. It did not analyze whether meteorological conditions impacted ozone levels in either 2020 or 2021.

There is reason to believe that some of these unanalyzed meteorological factors may have played a significant role in suppressing ozone concentrations at some of the air quality monitors in Southeast Michigan. For example, the 4th highest daily maximum 8-hour ozone concentration detected by the East 7 Mile monitor in Detroit dropped from 0.073 ppm in 2020 to 0.069 ppm in 2021. As shown in the two figures below, 2021 also had relatively higher levels of humidity in Detroit during the ozone season, which may have depressed ozone formation in the area.

---

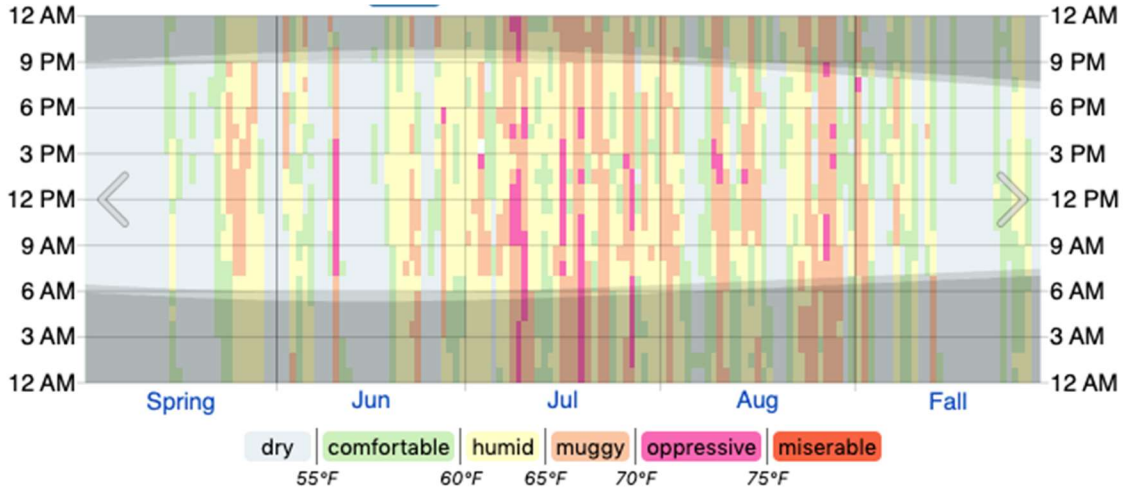
[51] U.S. EPA, Trends in Ozone Adjusted for Weather Conditions, https://www.epa.gov/air-trends/trends-ozone-adjusted-weather-conditions#:~:text=Variations%20in%20weather%20conditions%20play,cool%2C%20rainy%2C%20or%20windy .

[52] Noelia Otero et al., Temperature dependence of tropospheric ozone under NOx reductions over Germany, May 15, 2021, available at https://www.sciencedirect.com/science/article/pii/S1352231021001527#bib40 (attached hereto as Exhibit 6).

[53] *Id.*

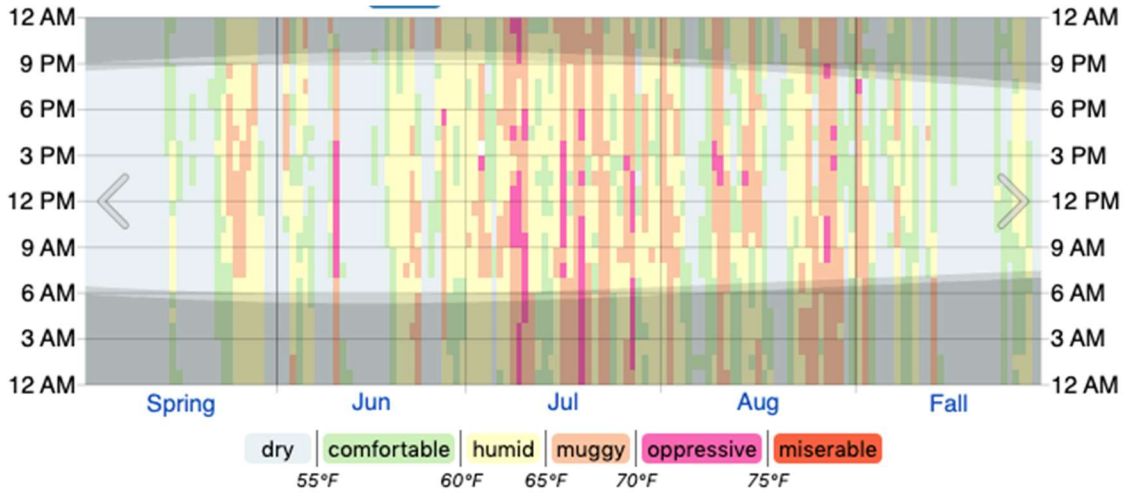
[54] *Id.*

Hourly Humidity Comfort Levels Categorized by Dew Point in the Summer of 2020 in Detroit[55]



The hourly reported humidity comfort level, categorized by dew point. The shaded overlays indicate night and civil twilight.

Hourly Humidity Comfort Levels Categorized by Dew Point in the Summer of 2021 in Detroit[56]



The hourly reported humidity comfort level, categorized by dew point. The shaded overlays indicate night and civil twilight.

[55] Weather Spark, Summer 2020 Weather History in Detroit, Michigan, https://weatherspark.com/h/s/16530/2020/1/Historical-Weather-Summer-2020-in-Detroit-Michigan-United-States#Figures-Humidity.

[56] Weather Spark, Summer 2021 Weather History in Detroit, Michigan, available at https://weatherspark.com/h/s/16530/2021/1/Historical-Weather-Summer-2021-in-Detroit-Michigan-United-States#Figures-Humidity.

In addition to failing to identify the whole range of relevant meteorological conditions for the years 2020 and 2021, both EGLE and EPA have failed to account for how lower than average temperatures and fewer days above 80 degrees Farenheit have impacted ozone concentrations at different monitors throughout Southeast Michigan. As noted above, both EGLE and the EPA emphasize the long-term trend of decreasing ozone concentrations along with increasing temperatures. Such a trend is simply not relevant for this attainment determination, which is based on ozone concentrations for the past three years. Instead, the relevant analysis is whether temperature and other meteorological conditions were the cause of lower ozone concentrations in any of the given three years, or whether the lower ozone concentrations were caused by permanent and enforceable reductions in the emissions of ozone precursors.

While the EGLE Analysis notes that there is a long-term trend of increasing temperatures, what it fails to note is that the average temperature and the number of days with a temperature greater than 80 degrees Farenheit measured at the East 7 Mile, New Haven, and Port Huron monitors appear to be below average for the entirety of the 2019 through 2021 period.[57] In particular, 2019 appears to have been a year with exceptionally few high temperature days. In that year, there were only 76 days with a maximum temperature equal to or above 80 degrees Farenheit, which is the lowest total since 2009.[58] Also in 2019, the 4th highest daily maximum 8-hour ozone concentrations were relatively low throughout the Southeast Michigan region.[59]

In summary, the EGLE Analysis and the LADCO Analysis do not provide sufficient justification for EPA to determine that the improvement in air quality was due to permanent and enforceable emissions reductions rather than unusually favorable meteorology. While both of these analyses support general, long-term conclusions regarding the downward trends of ozone concentrations due to downward trends in precursor emissions that have occurred over several decades, such long-term trends are not relevant for this attainment determination. Instead, what is relevant for this attainment determination is whether any reductions in ozone concentrations in at any of the eight ozone monitors in the Southeast Michigan area in 2019, 2020, or 2021 were due to unusually favorable meteorological conditions as opposed to permanent and enforceable emissions reductions. In particular, 2019 appears to have been a year with relatively few high temperature days which may have temporarily suppressed ozone concentrations in that year and as a result the 3-year ozone design value for 2019-2021. However, this issue is not addressed by either EGLE or EPA. Additionally, neither EGLE nor the EPA considered any meteorological conditions other than temperature and their potential impact on ozone concentrations in either 2020 or 2021. Based on these gaps, EPA cannot determine reductions in ozone were caused by

[57] EGLE, Request for Redesignation to Attainment and Submittal to the State Implementation Plan (SIP) for the Clean Air Act (CAA) Section 175A Maintenance Plan for the Southeast Michigan 2015 Ozone Nonattainment Area, Jan. 3, 2022 (hereinafter "EGLE Request for Redesignation"), at 11-14.
[58] NOAA Online Weather Data, Monthly Number of Days Max Temperature >= 80 for Detroit Area, MI (attached hereto as Exhibit 7)
[59] 87 Fed. Reg. at 14,211.

permanent and enforceable emissions reductions rather than unusually favorable meteorological conditions.

B. EPA Should Not Accept Michigan's Incomplete Analysis of the Impacts of the Economic Downturn on Ozone Concentrations in the Detroit Area

EPA relies on Michigan's analysis of point source emissions, vehicle miles traveled (VMT), and ozone concentrations in the Detroit area in 2019 and 2020 to discount the possibility that the economic impacts of the COVID-19 pandemic contributed to the lower design values for ozone for 2019-2021. While this analysis shows that ozone concentrations did not drop in the Detroit area in 2020 despite a decline in VMT and local point source emissions, there is no basis for the logical leap that lower levels in 2019 and 2021 were therefore the result of permanent and enforceable emission reductions.

The pandemic plunged the United States into a severe temporary recession. Unemployment peaked at 14.7% in April 2020[60], and in the second quarter of 2020 there was a decline in gross domestic product (31.4%) which was the highest single quarterly decline in real GDP recorded by the Bureau of Economic Analysis since 1947.[61] To combat the spread of coronavirus, many states went into lockdown and restrictions were put into place which resulted in a decrease in economic activity. As EPA is aware, coal power plant emissions reached an all-time low during 2020, and only gradually increased through 2021, largely because of the pandemic recession.[62] Coal consumption for electric power in Michigan, Indiana, and Illinois declined dramatically between 2019 and 2020 and was still down relative to 2019 in 2021.[63] Automobile travel similarly plunged during 2020 and did not return to pre-pandemic levels until June 2021, half-way through ozone season.[64]

NOx and VOC emissions correspondingly dropped dramatically during this time. For example, point source VOC emissions from the seven nonattainment counties dropped from near 10,000 tons in 2019 to below 8,000 tons in 2020, while point source NOx emissions from the

---

[60] *See* Congressional Research Service, *Covid-19 and the U.S. Economy* (May 11, 2021), https://crsreports.congress.gov/product/pdf/R/R46606 (attached hereto as Exhibit 8).
[61] *Id.* at 2.
[62] *See, e.g., COVID lockdown causes record drop in carbon emissions for 2020*, Stanford Earth Matters Magazine, Dec. 10, 2020, https://earth.stanford.edu/news/covid-lockdown-causes-record-drop-carbon-emissions-2020#gs.yon9py.
[63] *See* Energy Information Administration, Coal Data Browser (Data Set: Total Consumption, Electric Power), https://www.eia.gov/coal/data/browser/.
[64] U.S. Federal Highway Administration, Vehicle Miles Traveled [TRFVOLUSM227NFWA], retrieved from FRED, Federal Reserve Bank of St. Louis; https://fred.stlouisfed.org/series/TRFVOLUSM227NFWA, April 24, 2022 (based on nationwide data) (attached hereto as Exhibit 9).

nonattainment area dropped from more than 30,000 tons in 2019 to under 25,000 tons in 2020.[65] While Michigan did not include ozone precursor emissions data for 2021 in its request for redesignation, it would stand to reason that there remained a decline reflecting lower coal consumption and fewer vehicle miles traveled at least through the first part of ozone season.

Michigan noted that point source emissions and VMT decreased in the Detroit area between 2019 and 2020, but that these decreases were not associated with a corresponding decline in ozone values from 2019 to 2020. Michigan and EPA conclude from this analysis that "economic conditions associated with the COVID-19 pandemic were not correlated with the improved air quality" and that "Michigan's demonstration that the improved air quality is due to permanent and enforceable emission reductions."[66] To the contrary, the analysis only calls into question what conditions were in fact driving the ozone levels in the nonattainment area in 2020. Instead of trying to understand the contributing factors, EPA simply assumes that the economic impacts of the pandemic had no impact on ozone concentrations. It is entirely possible that the area's ozone levels would have been *even higher* had power sector and transportation emissions not been limited, but EPA does not consider this as a possibility.

EPA's omission of this alternative explanation is especially puzzling given its (unsurprising) finding based on the LADCO study, discussed just prior in EPA's notice and in section IV.A. above, that ozone precursor emissions correlated well with ozone concentrations. The logical conclusion from this finding would be that if coal-fired power plant production and VMT had been at normal levels during 2020, meteorological conditions in 2020 would have led to even higher ozone concentrations than monitored during the recession. Because the 2020 readings for six out of eight monitors were at or above 0.070 ppb, it seems very likely that the same meteorological conditions combined with normal emissions of precursors would have pushed the 2019-2021 design values to nonattainment. In short, EPA has not ruled out the 2020 recession as the cause for the area achieving attainment during this time period.

Another gap in Michigan and EPA's analysis is that it does not consider that the economy did not fully recover in 2021,[67] such that the lower ozone levels in 2021 could also have been influenced by lower power sector emissions and fewer vehicle miles traveled that year, particularly in the early months of the 2021 ozone season. Analysis from the International Energy Association found that demand for oil, coal, and gas in the United States were all down in 2021 relative to 2019.[68]

---

[65] EGLE Request for Redesignation at 18-19 (Charts 5 and 6).
[66] 87 Fed. Reg. at 14217.
[67] Congressional Research Service *supra* note 60 at 2 ("[M]any economic indicators show that economic activity has still not fully recovered [as of May 2021].")
[68] IEA (2021), Global Energy Review 2021, IEA, Paris https://www.iea.org/reports/global-energy-review-2021 (relevant chart attached hereto as Exhibit 10).

By relying on faulty and incomplete analysis on this central issue, EPA "entirely failed to consider an important aspect of the problem" before it.[69]

C. EPA Fails to Demonstrate that Emissions Reductions Resulting from the Federal Good-Neighbor Rules or Mobile Source Standards Led to Ozone Attainment in 2019-2021

EPA accepts Michigan's reliance on a series of federal rules on interstate transport of pollution, and vehicle and other engine standards as a key element of the demonstration that permanent and enforceable emissions reductions led to ozone attainment in 2019-2021 and will continue to ensure the area achieves attainment for 10 years following redesignation. There are several reasons why EPA and Michigan's reliance on these rules is illogical, incomplete, and fails to satisfy the requirements for redesignation. 42 U.S.C. § 7505a(a); 42 U.S.C. § 7407(d)(3)(E)(iv).

First, most of the referenced rules were implemented and would have had emissions impacts *prior to* 2019, and even prior to 2018. If the reductions resulting from those rules implemented prior to 2018 correlated with lower ozone concentrations in the Detroit area, it is unclear why ozone concentrations would increase in 2020, or why most of the monitors in the area would be in nonattainment based on design values for the years 2018-2020. The table below summarizes the rules upon which EPA and Michigan rely, and the timing of their implementation.

Rule	Implementation Timing
Clean Air Interstate Rule (CAIR)	2009-2015
Cross-State Air Pollution Rule (CSAPR); CSAPR Update	2015-2016; 2017 and on
Tier 2 Emissions Standards for Vehicles and Gasoline Sulfur Standards	2014-2016
Tier 3 Emissions Standards for Vehicles and Gasoline Sulfur Standards	2017 and on
Heavy-Duty Diesel Engine Rules	2007-2010 model years
Nonroad Diesel Rule	2008-2015 model years
Nonroad Spark Engines and Recreational Engines Standards	2004-2012 model years
Category 3 Marine Diesel Engine Standards	2011 and on

[69] *National Assn. of Home Builders v. Defenders of Wildlife*, 551 U.S. 644, 658 (2007).

Ozone concentrations increasing from 2019 to 2020 undermine EPA's finding that the reduced ambient concentrations in 2019-2021 are in fact attributable to regulations going into effect from 2004-2017.

Second, EPA relies upon the reductions in pollution projected from the CSAPR Update across all of the eastern United States (citing a reduction of 17,000 tons NOx beginning in 2021),[70] but this would include even those reductions downwind of the nonattainment area, and EPA does not determine whether reductions in emissions specifically causing nonattainment in Southeast Michigan will occur. Indeed, the CSAPR Update does not ensure that any particular plant will reduce its NOx limits to RACT levels or otherwise, as it is a cap-and-trade program. Thus, it is possible that, by purchasing allowances, plants contributing to the Detroit area's ozone problem may continue to pollute at the same levels.

V. EPA Improperly Finalized Michigan's Ozone Infrastructure SIP Without Responding to Comments and Should Not Rely on the SIP for Purposes of Redesignation Unless and Until EPA Reissues its Approval.

To redesignate a nonattainment area to attainment, EPA must find that the state containing the area "has met all requirements applicable to the area for the purposes of redesignation under section 110 and part D of the [Act]."[71] For an ozone nonattainment area, this includes having an approved "ozone infrastructure SIP" pursuant to section 110(a)(2) of the Act. In its proposed rule, EPA relies on its September 2021 partial approval of infrastructure SIP requirements for the 2015 Ozone NAAQS.[72] However, this partial approval was entered in error and is currently being revisited. Specifically, due to an oversight, EPA failed to review and respond to Sierra Club's timely comment on the proposal prior to issuing the final rule.[73] Sierra Club's comment pointed out that Michigan's ability to enforce emission limits specific to a particular facility were in question following a state court ruling on the state's attempt to place sulfur dioxide limits on U.S. Steel (a facility that is, incidentally, located in the ozone nonattainment area).[74]

EPA has indicated it is currently in the process of issuing a new final rule that includes a response to Sierra Club's comment.[75] Unless and until EPA reissues an approval that properly considers and responds to this comment, EPA should not consider Michigan to have an approved

[70] 87 Fed. Reg. at 14,215.
[71] 87 Fed. Reg. at 14, 211.
[72] 86 Fed. Reg. 53,550 (Sept. 28, 2021).
[73] Personal Communication with EPA Region 5, October 1, 2021; *see also* Regulations.gov Submission Confirmation, Aug. 2, 2021 (attached hereto as Exhibit 11).
[74] Sierra Club Comments on Proposed Partial Approval and Partial Disapproval of Michigan Infrastructure SIP Requirements for the 2015 Ozone NAAQS, Docket No. EPA–R05– OAR–2019–0215 (attached hereto as Exhibit 12).
[75] Personal Communication with EPA Region 5, April 21, 2022.

ozone infrastructure SIP for the purposes of redesignation. Sierra Club's comment went to the heart of the approvability of the SIP, and therefore should be considered before EPA finalizes its decision on the infrastructure SIP.

VI. Michigan's Maintenance Plan is Insufficient.

A. Michigan's Triggers and Contingency Measures are Too Lenient

As required by the Clean Air Act, Michigan has provided triggers that will be used to determine when contingency measures should be implemented as well as a list of potential contingency measures.

The triggers provided by EGLE are too lenient. The maintenance plan provides a warning level response trigger of an annual 4th high daily maximum 8-hour average of 74 ppb or more in a single ozone season. It also provides an action level response trigger of a 4th high daily maximum 8-hour average monitoring value averaged over two years of 71 ppb or more.

Both the warning level response threshold and the action level response threshold are essentially meaningless given the thin margin of attainment. A 4th high daily maximum 8-hour average below the warning level response trigger of 74 ppb in 2022 would trigger a nonattainment designation at five of the eight ozone monitors in Southeast Michigan. Even a 4th high daily maximum 8-hour average monitoring value of 71 ppb in a single ozone season would trigger a nonattainment designation at four of the eight ozone monitors in Southeast Michigan. In short, it's highly likely that a nonattainment designation will be required before any warning level or action level response is implemented.

In addition to the thresholds for both the action level and the warning level being too low, the timeline allowed from the implementation of a contingency measures after such exceedances have occurred are far too long. According to the maintenance plan, Michigan would have 18 months to implement necessary controls in response to a warning level or action level exceedance. By that time, any nonattainment designation would be finalized.

Lastly, the maintenance plan gives Michigan excessive discretion to determine whether control measures options are necessary and if so, which ones. It states that "Michigan may select one of the following control measures, if necessary, to address an upward trend in air quality."[76] This language does not commit Michigan to implementing any control measures and lacks specificity

[76] EGLE, Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard and Revision to Michigan's State Implementation Plan and Ozone Maintenance Plan for Southeast Michigan Ozone Nonattainment Area, at 29.

as to which measures should be implemented in response to different levels of increasing ozone pollution.

Rather than hastily approving this redesignation request with an ineffectual maintenance plan, EPA should at least wait until the end of the 2022 ozone season to act upon this redesignation request. The maintenance plan should also address the very real possibility of 3-year ozone design values rising above the NAAQS in the near future and should commit Michigan to an expedited nonattainment designation process if that occurs.

B. EPA and Michigan's reliance on the 2016v2 modeling data is suspect and obscures actions that may be necessary to assure attainment

To set the level of statewide emissions that will be sufficient to maintain attainment, Michigan selected 2019 to represent attainment level emissions, and relied on the EPA 2016v2 modeling platform to derive emission levels for that year. Specifically, to derive point, nonpoint, and nonroad inventories for 2019, EGLE interpolated between 2016 and 2023 data from the 2016v2 modeling platform.[77] EPA notes, "For both NOX and VOC, EGLE's 2019 inventory shows emissions levels that are lower than the levels of actual emissions derived by EPA from [its Emissions Inventory System]."[78] EPA concludes from this that Michigan is thus being more cautious than necessary in setting levels of emissions that are sufficient to attain the standard. However, EPA fails to also draw the logical conclusion that the 2016v2 model may be underpredicting emissions, and that this may also call into question Michigan's projections of attainment level emissions through 2032 based on the model.

EPA does not discuss the details of the 2016v2 model, but points the public to the Technical Support Document (TSD) accompanying the model.[79] That TSD in turn explains the complex process by which the point source emissions inventories used in the model are derived. [80] It would be difficult if not impossible for an outside expert, let alone a layperson, to scrutinize this process and the inner workings of the model. Relying on what is essentially a black box for this essential element of Michigan's attainment plan makes it difficult for the public to evaluate the legitimacy of these estimates. However, it is worth noting that the model's predictions of reductions in ozone concentrations appear overly optimistic based on historic trends. For example, the model predicts that ozone concentrations at the Detroit area monitors at issue in this rulemaking will decrease by approximately 7-8 parts per billion (ppb) between 2016 and 2023. As many of the monitors' average readings have not dropped significantly between 2016 and

[77] 87 Fed. Reg. at 14,216.
[78] *Id.* at 14,216 n.7.
[79] *Id.* at 14,216 n. 6.
[80] EPA, Technical Support Document (TSD): Preparation of Emissions Inventories for the 2016v2 North American Emissions Modeling Platform, at 162-217, available at https://www.epa.gov/airemissions-modeling/2016-version-2-technicalsupport-document.

2021, most of this reduction would have to come in only the next two years for the modeling to be correct. For example, the East 7 Mile monitor's 4th highest reading would have to drop from 69 ppb in 2021 to 60.2 ppb by 2023, its lowest 4th highest reading in the last 15 years by more than 6 ppb, and nearly 8 ppb lower than its latest three-year average, to match the model's predictions.[81] These unrealistic predictions render suspect Michigan's heavy reliance on the 2016v2 model for its attainment projections.

EPA should explain more specifically how it can assure what would be drastic and historic improvements in air quality predicted by the 2016v2 model. Although there are a number of coal plants expected to retire in Michigan prior to 2035, EPA should specifically identify whether those retirements will achieve the necessary air quality improvements to maintain emission levels below 2019 levels. If EPA and Michigan are relying on these plant retirements or other specific emission reductions, the maintenance plan should ensure these retirements and other changes are legally enforceable.

By simply relying on the model's predictions without further detail, EPA obscures the enforceable measures that would need to be included in the maintenance plan. Further, in the event of a change in Administration, it is possible that many of the regulatory actions assumed in the 2016v2 modeling would not ultimately be implemented and emissions could rise. This possibility makes it even more imperative that Michigan specifically identify and include in its maintenance plan the necessary measures to maintain attainment..

C. Michigan does not have sufficient authority to enforce emission control measures to correct future ozone problems

In proposing to approve Michigan's maintenance plan, EPA relies on Michigan's commitment "that it has the authority to implement the requested SIP revision . . . includ[ing] the authority to adopt, implement, and enforce any subsequent emission control measures determined to be necessary to correct future ozone attainment problems."[82] Unfortunately, Michigan's authority to do so is in fact in question as described below and discussed in Sierra Club's comments on the ozone infrastructure SIP referenced above.

A 2017 Michigan Court of Claims opinion found that the state could not single out specific polluters for emissions reductions because it would violate the state's Administrative Procedures

[81] Compare EPA, 2016v2 Design Value and Contribution Data File (2016v2_DVs_state_contributions.xlsx), https://www.epa.gov/air-emissions-modeling/2016v2-platform (attached hereto as Exhibit 13), with EGLE, 4th Highest Maximum 8-Hour Ozone Concentration Per Year and 3-Year Average (updated Mar. 15, 2022) (Exhibit 3).
[82] 87 Fed. Reg. at 14,219.

Act.[83] There, the Michigan Department of Environmental Quality (MDEQ) (now EGLE) had issued an administrative rule to limit sulfur dioxide (SO_2) pollution from United States Steel in an attempt to bring the Detroit sulfur dioxide nonattainment area back into attainment with the 2010 sulfur dioxide NAAQS. "Michigan imposed the emission limits it had concluded were necessary at U.S. Steel to bring the Detroit area into attainment by passing Michigan Administrative Code (MAC) 336.1430 ('Rule 430'). Michigan submitted Rule 430 to EPA as an enforceable limitation element of its SO_2 plan. Subsequently, U.S. Steel challenged the legality of Rule 430 in the Michigan Court of Claims, which invalidated Rule 430 on October 4, 2017."[84]

The Court of Claims[85] specifically took issue with MDEQ's focus on a particular facility, even though MDEQ found that such a focus was necessary to meet its requirements for a SIP that would achieve attainment with the SO_2 NAAQS.

> Rule 430 makes clear there is one entity, and one entity only to which Rule 430 can conceivably apply: U.S. Steel. As a consequence of being "targeted" by Rule 430, U.S. Steel argues that DEQ's actions have gone beyond that which is permitted of rulemaking under the APA by ignoring the 'general applicability' admonishment of [Michigan Code of Laws] 24.207. This Court finds agreement with that argument. . . The Court agrees with U.S. Steel that Rule 430 fails the APA's "general applicability" requirement for rulemaking. The targeted action taken by DEQ in this case sounds more in the nature of that which is ordinarily only allowed after a contested case hearing or in the permit process.

U.S. Steel Corp, 2017 WL 5974195 at *3, *4. It thus appears that, contrary to the requirements of 42 U.S.C. §§ 7410(a)(2)(A) and 7410(a)(2)(E)(i) and the requirements for an adequate maintenance plan, Michigan is prohibited by a provision of state law (the state's Administrative Procedures Act) from carrying out an implementation plan that includes enforceable emissions limitations "as may be necessary or appropriate to meet the applicable requirements."

In its proposed action, EPA does not address the court's holding or otherwise explain Michigan's authority to impose enforceable emissions limitations as may be necessary when a particular polluter refuses to limit pollution as needed to bring an area into attainment with the NAAQS. EPA must reexamine whether Michigan has adequate authority to implement its maintenance plan in light of *U.S. Steel Corp.* and disapprove the plan if it does not.

---

[83] *United States Steel Corp. v. Dept. of Environmental Quality*, No. 16–000202–MZ, 2017 WL 5974195 (Mich. Ct. Cl. Oct. 4, 2017).

[84] *Air Plan Approval; Michigan; Partial Approval and Partial Disapproval of the Detroit SO2 Nonattainment Area Plan*, 85 Fed. Reg. 58,315, 58,317 (Sept. 18, 2020).

[85] The Court of Claims is a court of statewide, limited jurisdiction to hear and determine civil actions filed against the State of Michigan and its agencies. *See* Michigan Court of Claims, https://courts.michigan.gov/courts/coc/Pages/default.aspx.

D. Michigan has failed to properly implement its PSD NSR Program

The Clean Air Act requires that in order for the EPA to approve a request to redesignate a nonattainment area to an attainment area, it must determine that the state has met all applicable State Implementation Plan requirements described in section 110.[86] This includes a requirement to include provisions for the proper implementation of Part C, including the PSD NSR program.

EGLE has failed to properly implement the preconstruction monitoring requirement in regards to ozone for numerous permit-to-install applications subject to PSD NSR. Section 165 of the Clean Air Act establishes preconstruction requirements for new sources and modified sources that are subject to PSD NSR. One such requirement calls for the submission of "continuous air quality monitoring data gathered for purposes of determining whether emissions from such facility will exceed the maximum allowable increases or the maximum allowable concentration permitted under this part."[87] While the EPA has authorized states to establish exemptions from the preconstruction monitoring requirement – commonly referred to as significant monitoring concentrations (SMCs) – EPA has also specified that any net emissions increase of 100 tons per year or more of VOCs or NOx will require an ambient impact analysis, including the gathering of air quality.[88]

While Michigan has adopted this language in its SIP,[89] it has failed to properly implement it. Specifically, Michigan has failed to require ozone preconstruction monitoring in the context of PSD NSR even when there will be a net emissions increase of 100 tons per year or more of either volatile organic compounds or nitrogen oxides. When challenged on this matter in *Sierra Club v. EGLE,* EGLE asserted that it was only required to gather ambient air quality data in the context of PSD NSR if there is both a net emissions increase of 100 tons per year or more of either volatile organic compounds or nitrogen oxides and there is a predicted ozone impact above the Significant Impact Level of 1.0 ppb established by EPA guidance.[90] In an unpublished opinion, the Court of Appeals disagreed with EGLE.[91] However, we remain concerned that EGLE will continue to improperly exempt permit to install applicants from the requirement to gather ozone ambient air quality data as a part of PSD NSR in violation of EPA regulations and its own SIP. In addition to being unlawful, EGLE's approach will make it harder for the agency and for citizens to ensure that new sources of ozone precursors will not threaten attainment of the NAAQS. As such, we believe it is improper for the EPA to conclude that Michigan has met all applicable requirements of section 110.

---

[86] 42 USC 7407(d)(3)(E)(v).
[87] 42 USC 7475(e)(2).
[88] 40 CFR 51.166(d)(5).
[89] Mich. Admin. Code R. 336.2809(5)(a)(v).
[90] *Sierra Club v. EGLE,* 2021 Mich. App. LEXIS 131 (2021) (attached hereto as Exhibit 14)
[91] *Id.*

Additionally, we note that in *Sierra Club v. EPA,* the D.C. Circuit Court of appeals called the legal validity of SMCs into question. In that case, the court vacated the SMCs for particulate matter on the basis that section 165(e)(2) represents an "extraordinarily rigid" mandate which does not provide EPA with the power to grant exemptions.[92] As such, we believe the SMCs established for ozone in 40 CFR 51.166(i)(5)(i)(f) and 40 CFR 52.21(i)(5)(i)(f) are unlawful and must be vacated.

VII. Conclusion

EPA simply does not have enough evidence to reasonably conclude that the 0.070 ppm design value for 2019-2021 ozone levels in the Detroit area was the result of permanent and enforceable emission reductions, as opposed to favorable meteorological conditions or the economic downturn during that time period. Moreover, Michigan's proposed maintenance plan is entirely too weak. To protect public health in the seven-county area affected, and particularly in the environmental justice communities in and around Detroit, EPA should disapprove both Michigan's request for redesignation and its request to incorporate the proposed maintenance plan into its SIP. Thank you for considering these comments.

Respectfully submitted,

Elena Saxonhouse
Managing Attorney
Sierra Club Environmental Law Program
2101 Webster Street, Suite 1300
Oakland, CA 94612
(415) 265-2943

Nick Leonard
Executive Director
Great Lakes Environmental Law Center
4444 Second Avenue
Detroit, MI 48216
(313) 782-3372

On behalf of:

Sierra Club

Great Lakes Environmental Law Center

Asthma & Allergy Foundation of America, Michigan Chapter

Michigan Environmental Justice Coalition

Detroit Green Skills Alliance

MI Air MI Health

Ecology Center

Citizens' Climate Lobby, Detroit Metro North Chapter

Great Lakes Renewable Energy Association

McLouth Waterfront Alliance

Moms Clean Air Force, Michigan Chapter

Detroit Greenways Coalition

Clean Water Action

Michigan United

[92] *Sierra Club v. EPA,* 403 U.S. App. D.C. 318, 328; 705 F.3d 458, 467 (2013) (attached hereto as Exhibit 15).

League of Michigan Bicyclists

Michigan Clinicians for Climate Action

Natural Resources Defense Council

Michigan League of Conservation Voters

Detroit People's Platform

Detroit Hamtramck Coalition for Advancing Healthy Environments

Environmental Law and Policy Center

Archived:	Thursday, April 30, 2026 10:09:22 AM
From:	Skipp Kropp
Mail received time:	Tue, 21 Apr 2026 18:07:34
Sent:	Tuesday, April 21, 2026 2:07:35 PM
To:	Shuff, Erica (EGLE)
Cc:	Skipp Kropp
Subject:	Midwest Ozone Group Comments in Support of Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for Southeast Michigan Nonattainment Area
Importance:	Normal
Sensitivity:	None
Attachments:	MOG Comments on Addendum to the Request for Redesignation to Attainment.pdf;

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Dear Ms. Shuff,
Attached are comments of the Midwest Ozone Group in support of the Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for Southeast Michigan Nonattainment Area. Please call or email if you have questions and I'd appreciate a confirmation receipt for the comments.
Thanks,
Skipp Kropp
Counsel for the Midwest Ozone Group

Skipp Kropp
Attorney
Steptoe & Johnson PLLC
PO Box 36425
Indianapolis, Indiana 46236
Phone: 317-946-9882

Skipp.Kropp@steptoe-johnson.com
www.steptoe-johnson.com



Steptoe & Johnson PLLC Note:
This e-mail and any attachments are confidential and may be protected by legal privilege. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of this e-mail or any attachment is prohibited. If you have received this e-mail in error, please notify us immediately by returning it to the sender and delete this copy from your system. Thank you for your cooperation.

STEPTOE & JOHNSON PLLC
ATTORNEYS AT LAW

Huntington Center, Suite 2200
41 South High Street
Columbus, Ohio 43215
Phone: 614-221-5100 Fax: 614-221-0952
www.steptoe-johnson.com

Writer's Contact Information
317-946-9882
skipp.kropp@steptoe-johnson.com

April 21, 2026

Erica Shuff
Air Quality Division
Michigan Department of Environment, Great Lakes, and Energy
P.O. Box 30260
Lansing, Michigan 48909-7760

Re: **Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for Southeast Michigan Nonattainment Area**

Dear Ms. Shuff:

The Midwest Ozone Group[1] ("MOG") is pleased to offer these comments[2] regarding the "Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for Southeast Michigan Nonattainment Area (Request for Redesignation). The draft was made available for public comments by the Michigan Department of Environment, Great Lakes, and Energy's (EGLE) Air Quality Division on March 23, 2026, with a comment deadline of April 22, 2026.

MOG is an affiliation of companies and associations that draws upon its collective resources to seek solutions to the development of legally and technically sound air quality programs that may impact on their facilities, their employees, their communities, their contractors, and the consumers of their products. MOG's primary efforts are to work with policy makers in evaluating air quality policies by encouraging the use of sound science.

MOG has been actively engaged in a variety of issues and initiatives related to the development and implementation of air quality policy, including the development of transport

[1] The members of the Midwest Ozone Group include: Ameren, American Electric Power, American Forest & Paper Association, American Iron and Steel Institute, American Wood Council, Appalachian Region Independent Power Producers Association, Associated Electric Cooperative, Berkshire Hathaway Energy, Big Rivers Electric Corp., Citizens Energy Group, City Water, Light & Power (Springfield IL), Cleveland Cliffs Inc., Council of Industrial Boiler Owners, Duke Energy Corp., East Kentucky Power Cooperative, ExxonMobil, Hoosier Energy REC, Inc., Indiana Energy Association, Indiana-Kentucky Electric Corporation, Indiana Municipal Power Agency, LGE/ KU, Marathon Petroleum Company, Monongahela Power Company, National Lime Association, North American Stainless, Nucor Corporation, Ohio Utility Group, Ohio Valley Electric Corporation, Olympus Power, Steel Manufacturers Association, and Wabash Valley Power Alliance.

[2] These comments were prepared with the technical assistance of Alpine Geophysics, LLC.

rules, NAAQS standards, attainment/nonattainment designations, petitions under Sections 126, 176A and 184(c) of the Clean Air Act, National Ambient Air Quality Standards ("NAAQS") implementation guidance, the development of Good Neighbor State Implementation Plans, exceptional events and 179B demonstration, and related regional haze and climate change issues.

I. EGLE has correctly demonstrated that the seven southeast Michigan counties currently designated as marginal nonattainment, effective August 3, 2018: Wayne, Oakland, Macomb, Washtenaw, St. Clair, Livingston, and Monroe (southeast Michigan). should be redesignated to attainment.

A. Clean Air Act requires a state to show that it is in attainment of the NAAQS to qualify for redesignation.

Clean Air Act Section 107(d)(3)(E) addresses the requirements for redesignation of an area from nonattainment to attainment. The factors are as follows:

> (i) the Administrator determines that the area has attained the national ambient air quality standard;
>
> (ii) the Administrator has fully approved the applicable implementation plan for the area under section 110(k);
>
> (iii) the Administrator determines that the improvement in air quality is due to permanent and enforceable reductions in emissions resulting from implementation of the applicable implementation plan and applicable Federal air pollutant control regulations and other permanent and enforceable reductions;
>
> (iv) the Administrator has fully approved a maintenance plan for the area as meeting the requirements of section 175A; and
>
> (v) the State containing such area has met all requirements applicable to the area under section 110 and part D.

Clean Air Act Section 107(d)(3)(E).

Section 107(d)(3)(E) does not specifically address exceptional events, but instead, it simply requires that the NAAQS must be attained. Since it does not specify how the NAAQS must be attained, it follows that so long as the NAAQS are attained and the other factors above are met, redesignation would be proper.

When amending the Clean Air Act in 2005, Congress specifically provided that air quality monitoring data affected by exceptional events should be removed from regulatory consideration The enactment of these provisions establishes the process by which U.S. Environmental Protection Agency ("U.S. EPA") could exclude air quality monitoring data directly related to an exceptional event. *See* 42. U.S.C. § 7619. Subsequently, U.S. EPA promulgated the exceptional events rule. 40 C.F.R. § 50.14.

B. Exceptional events are the basis for this redesignation request.

MOG strongly supports the EGLE effort to assess the influence of US and Canadian wildfire events on the state's air quality and its ability to meet current NAAQS. The EGLE Request for Redesignation clearly demonstrates that the air quality in southeast Michigan had been impacted by smoke entering the region from wildfires in Canada during 2023 and 2025. The Request for Redesignation notes that "[d]ue to this influence, EGLE has completed additional EE demonstrations for southeast Michigan," adding that, "[i]n February 2026, EGLE submitted to the USEPA an EE demonstration regarding impacts to the Allen Park and Detroit – East 7 Mile monitoring sites. Additionally, another EE demonstration submittal for the Oak Park and Port Huron monitoring sites was developed, and at the time of creation of this document was released for public comment."

The Request for Redesignation also includes a commitment that "EGLE will consider and address any comments received regarding the pending EE demonstration and, if appropriate, intends to submit it to the USEPA in April of 2026. If the USEPA concurs with the EE demonstrations, the data from the Allen Park, Detroit – East 7 Mile, Oak Park, and Port Huron monitoring sites for the impacted days will be excluded from ozone season calculations for southeast Michigan 2023 through 2025 DVs. With the exclusion of the data the DVs will be at or below the 2015 ozone NAAQS and EGLE will continue to pursue redesignation."

While Clean Air Act Section 107(d)(3)(E) addresses the requirements for redesignation of an area from nonattainment to attainment, that section does not specifically address exceptional events other than to make it clear that the NAAQS must be attained – the very conclusion of the exceptional events demonstration.

EGLE has met each of the designation requirements and more with its exceptional events demonstrations. Accordingly, MOG strongly supports Request for Redesignation.

II. While not necessary to support the current resignation request, EGLE is urged to initiate exceptional events demonstrations for all other days that impacted on the ozone air quality in the southeast Michigan nonattainment area.

In addition to supporting this redesignation with the exceptional events, we also believe it is important to submit additional exceptional events demonstrations for all of the other affected days so that the corrected DVs will be significantly lower than the 2015 ozone NAAQS, minimizing the need to invoke the maintenance plan in the future.

While EGLE has requested the exclusion of the monitored ozone concentrations measured in the southeast Michigan nonattainment area in 2023 and 2025, MOG believes that many of the top observation days in that region had ozone observations enhanced by the presence of wildfire smoke (Canadian or Mexican) and could be considered for additional exceptional event demonstration action.

While these additional dates may not be needed to demonstrate attainment with the 70-ppb ozone NAAQS, lower design values resulting from the removal of these dates could impact the

need to invoke RACT/RACM, and other requirements associated with the redesignated attainment area.

III. Conclusion

For the reasons set forth above, the Midwest Ozone Group urges EGLE to finalize its Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for Southeast Michigan Nonattainment Area for submittal to U.S. EPA for approval.

Sincerely,



Edward "Skipp" Kropp
Counsel for the Midwest Ozone Group

Steptoe & Johnson PLLC Note:
This e-mail and any attachments are confidential and may be protected by legal privilege. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of this e-mail or any attachment is prohibited. If you have received this e-mail in error, please notify us immediately by returning it to the sender and delete this copy from your system. Thank you for your cooperation.

Archived: Thursday, April 30, 2026 10:09:50 AM
From: Frazier, Jacob
Sent: Wed, 22 Apr 2026 18:57:17
To: Shuff, Erica (EGLE)
Subject: Ozone Levels in SE Michigan
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Dear Ms. Shuff,

I'm writing to submit a public comment on EGLE's proposed addendum to the Request for Redesignation to Attainment the ozone NAAQS.

You have a responsibility to the people of Michigan to ensure that our air is safe. We should be attracting people to come here, and they won't do that if it's going to be bad for them and their families.

As a lifetime resident of Michigan, I am proud of my state and its natural environment, which is its greatest asset economically, aesthetically, and for the quality of life of its residents.

That said, I'm ashamed to hear about EGLE's plans to skirt federal Clean Air Act requirements for air quality and ozone concentrations by taking advantage of the Trump administration's infamously lax enforcement of environmental regulations. Ozone is a lung irritant that has been shown to lead to increased risk of infection and chronic respiratory disease. Instead of changing the rules around us to allow southeast Michigan to reach EPA attainment status, we should be striving to achieve better air quality for the benefit of Detroit and its neighboring communities.

Don't allow Michigan to become another example to the nation of poor environmental health, as it did in 2014 with the Flint Water Crisis.

Thank you,
Jacob Frazier
Field Manager
Clean Water Action, East Lansing Field Canvass

Archived: Thursday, April 30, 2026 10:09:59 AM
From: [redacted]
Sent: Tue, 21 Apr 2026 10:54:09
To: Shuff, Erica (EGLE)
Subject: Protect SE MI from Smog
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Dear Ms Shuff,

I am a Detroit resident and I'm very concerned with EGLE's actions.

I ask you to withdraw EGLE's draft addendum to its request for ozone redesignation to the EPA, as it is an attempt to ignore the federal court's ruling that EGLE must adopt and implement additional regulations for industrial facilities that emit smog-causing pollutants - volatile organic compounds and nitrogen oxides. EGLE has still not complied with the Clean Air Act's requirements as instructed by the federal court of appeals.

I also ask you to work on protecting residents in Southeast Michigan by lowering the emissions of smog-causing pollution. Southeast MI is still failing to meet the Smog Air Quality Standard, and Detroit's Asthma crisis is still growing.

Sincerely,
[redacted]

Archived: Thursday, April 30, 2026 10:10:15 AM
From: [redacted]
Sent: Wed, 22 Apr 2026 14:51:43
To: Shuff, Erica (EGLE)
Subject: Public Comment for Request for Redesignation to Attainment
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Dear Erica Shuff,

I'm writing to submit a public comment on EGLE's proposed addendum to the Request for Redesignation to Attainment the ozone NAAQS.

As a lifetime resident of Michigan, I am proud of my state and its natural beauty, which is its greatest asset, economically, aesthetically, and for the quality of life of its residents.

That said, I'm ashamed to hear about EGLE's plans to skirt federal Clean Air Act requirements for air quality and ozone concentrations by taking advantage of the Trump administration's infamously lax enforcement of environmental regulations. Ozone is a lung irritant that has been shown to lead to increased risk of infection and chronic respiratory disease. Instead of changing the rules around us to allow southeast Michigan to reach EPA attainment status, we should be striving to achieve better air quality for the benefit of Detroit and its neighboring communities.

Don't allow Michigan to become another example to the nation of poor environmental health, as it did in 2014 with the Flint Water Crisis.

Thank you,
[redacted]
Field Canvasser
Clean Water Action, East Lansing Field Canvass

Archived: Thursday, April 30, 2026 10:14:26 AM
From: Sharon B
Mail received time: Thu, 23 Apr 2026 00:06:50
Sent: Wednesday, April 22, 2026 8:06:51 PM
To: Shuff, Erica (EGLE)
Subject: PUBLIC COMMENT on the Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standards for Southeast Michigan
Importance: Normal
Sensitivity: None
Attachments: image1776902755095;

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Public Comment on the Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standards for Southeast Michigan

Submitted by: Rev. [redacted]

Personal Comment
Date: Earth Day, April 22, 2026

To MDEGLE:

I submit the following comments regarding the addendum to the redesignation request for the 2015 ozone National Ambient Air Quality Standards (NAAQS) for Southeast Michigan. While attainment under the Clean Air Act is an important milestone, it does not equate to protection of public health—particularly in communities already experiencing disproportionate environmental burdens. MDEGLE's stated mission is: "To protect Michigan's environment and public health by managing air, water, land, and energy resources." MDEGLE's mission is not to favor industry over public health or the dollars and economic benefit provided by industry to residents of this state. The environment and residents are centered in MDEGLE's mission and it's policies should honor that mission. Instead we as residents attend public hearings, burdened by health expenses, suffering, and poor quality of life, forced to beg for protection of our health.

The Detroit metropolitan area continues to experience elevated ozone levels and worsening air quality trends. Detroit has also been identified as the #1 asthma capital in the United States, with asthma prevalence, emergency department visits, and hospitalization rates significantly exceeding state and national averages. These impacts fall disproportionately on Black residents and low-income communities. My husband has [redacted] which started in 1997, one year after we moved to Michigan. We live in Hamtramck, MI where many of our neighborhood children suffer from [redacted]

At the same time, many Detroit neighborhoods remain near clusters of industrial sources, including concrete batch plants, aggregate operations, steel facilities, refineries, and major freight corridors. These sources contribute to ozone precursor emissions (NOx and VOCs) as well as co-pollutants that worsen respiratory health outcomes.

Therefore, with respect to this addendum, I believe MDEGLE should strengthen the maintenance plan with health-protective triggers, given the persistent ozone burden in Southeast Michigan, the maintenance plan must include: 1) Early action triggers below 70 ppb; 2) automatic, enforceable contingency measures; 3) seasonal response strategies during peak ozone months.

This is especially critical in areas near industrial corridors such as Southwest Detroit and the Downriver communities, where cumulative emissions from multiple facilities increase local exposure risk.
The addendum should incorporate:

- Asthma-related emergency department visits and hospitalizations
- Childhood asthma prevalence
- School absenteeism linked to respiratory illness

These metrics are particularly important in neighborhoods located near facilities such as Marathon Petroleum's Detroit Refinery, U.S. Steel Great Lakes Works, and dense clusters of concrete and aggregate operations, such as Hamtramck, Highland Park and inner ring communities bordering Detroit, where residents face elevated cumulative exposure.

MDEGLE is seeking to expand VOC monitoring in overburdened Detroit communities but in my opinion the current monitoring network does not adequately capture localized impacts near major sources. The addendum should:

Additional monitors in Southwest Detroit, Delray, River Rouge, and Ecorse, and require fenceline monitoring at major facilities, including:

Marathon Petroleum Detroit Refinery
U.S. Steel Great Lakes Works
DTE Energy's Monroe Power Plant (a major regional NOx source)

I believe stronglty that MDEGLE needs to expand monitoring especially near clusters of concrete batch plants and crushing facilities operating within and adjacent to residential neighborhoods, including Hamtramck and Highland Park. Localized monitoring is essential to capture the real-world exposure conditions experienced by residents.
MDEGLE should accept the federal courts ruling and focus not on an addendum, rather focus on emissions reduction via industrial sources.

I believe we can reasonably predict that climate change and concurrent wildfires will continue to affect public health, which MDEGLE is mandated to protect. Reduction of emissions is imperative. The addendum should include enforceable commitments to reduce emissions from major sources, including:

- Marathon Petroleum Detroit Refinery (Wayne County)
- U.S. Steel Great Lakes Works (Ecorse/River Rouge)
- DTE Monroe Power Plant (Monroe County)

In addition, the plan should specifically address emissions from concrete batch plants and aggregate crushing operations located throughout Detroit and Wayne County, which contribute to both particulate pollution and ozone precursor emissions through diesel equipment and materials handling. In my neighborhood alone, Kronos Concrete operates 22 trucks per day, 6 days a week, affecting the most densely populated area of MI, namely Hamtramck, MI and nearby Cadillac Heights and Banglatown.

Ozone formation is intensified by heat, and climate change is expected to increase ozone levels. This is especially concerning for dense urban areas like Detroit, where heat island effects are pronounced. Therefor this addendum should include climate-adjusted ozone modeling; heat-ozone action plans and protective measures for vulnerable populations.

Ozone transport from upwind sources contributes to Southeast Michigan's air quality challenges. The addendum should quantify interstate contributions using EPA tools and ommit to regional collaboration and regulatory action where necessary.

Required measures should include: declining NOx and VOC emission limits; enhanced controls on combustion processes and fugitive emissions. Stronger permitting requirements for new and modified sources.

This addendum could break new ground in addressing environmental justice in impacted Detroit neighborhoods. Communities in Southwest Detroit, particularly near Delray and the I-75 and I-94 freight corridors, experience overlapping exposures from industrial facilities; heavy-duty diesel traffic; rail yards and logistics hubs

The addendum should:

- Require conducting a cumulative impact analysis

- Designate priority protection zones
- Require enhanced emission reductions and monitoring in these areas
- Establish formal community oversight mechanism

I also believe that mobile source controls in freight corridors including I-75, I-94, and the Ambassador Bridge corridor—contribute significantly to ozone precursor emissions. The addendum should expand zero-emission freight and vehicle strategies, strengthen anti-idling enforcement, and reduce diesel emissions in high-traffic corridors

The density of emission sources in Southeast Michigan demands tighter contingency measures with clearly defined and enforceable measures that are implemented within no more than 6 months of trigger events and supported by dedicated funding.

The MVEB must reflect the significant contribution of mobile and freight emissions in the Detroit region and include a strong margin of safety; periodic downward adjustments, and alignment with regional emission reduction goals.

In addition I believe this addendum should include: independent third-party review, annual celebrations and public reporting and hearings that lift up improved public health in Michigan (like becoming # 52nd among the states in asthma hospitalization rates); mandatory corrective actions if benchmarks are not met.

Detroit's ongoing air quality challenges, combined with its designation as the nation's most severe asthma burdened city, make clear that redesignation alone is insufficient. The continued presence of major industrial sources—including Marathon Petroleum Detroit Refinery, U.S. Steel Great Lakes Works, DTE Monroe Power Plant, and numerous concrete and aggregate facilities embedded within residential neighborhoods—requires a more protective and enforceable approach.

Strengthening this addendum to include targeted emission reductions, expanded monitoring, and environmental justice protections is essential to ensuring that attainment translates into real and lasting public health improvements.

I respectfully urge the agency to revise the addendum accordingly. I noted in the discussion during the Q &A this evening that 'MDEGLE has limited resources and must focus on what is possible within budgeted options.' Nothing is more valuable to a person than one's health. Instead of public hearings where we have to beg for these concerns to be uplifted, I support a shift in policy approach such that you become our trusted, tireless, and determined advocates.

I would like to also suggest a public portal where all comments of this public hearing and the MDEGLE responses are available to be viewed online.

Sincerely,

Rev. [redacted] MSW

[redacted]

Hamtramck, MI 48212

[redacted]@proton.me

[redacted]

Sent with Proton Mail secure email.

Archived: Thursday, April 30, 2026 10:14:31 AM
From: [redacted]
Sent: Wednesday, April 22, 2026 2:53:15 PM
To: Shuff, Erica (EGLE)
Subject: Public Comment Regarding Redesignation to Attainment
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Dear Erica Shuff,

I'm writing to submit a public comment on EGLE's proposed addendum to the Request for Redesignation to Attainment the ozone NAAQS.

As a lifetime resident of Michigan, I am proud of my state and its natural beauty, which is its greatest asset, economically, aesthetically, and for the quality of life of its residents.

That said, I'm ashamed to hear about EGLE's plans to skirt federal Clean Air Act requirements for air quality and ozone concentrations by taking advantage of the Trump administration's infamously lax enforcement of environmental regulations. Ozone is a lung irritant that has been shown to lead to increased risk of infection and chronic respiratory disease. Instead of changing the rules around us to allow southeast Michigan to reach EPA attainment status, we should be striving to achieve better air quality for the benefit of Detroit and its neighboring communities.

Don't allow Michigan to become another example to the nation of poor environmental health, as it did in 2014 with the Flint Water Crisis.

Thank you,
[redacted]

Archived: Thursday, April 30, 2026 10:14:34 AM
From: [redacted]
Sent: Wed, 22 Apr 2026 14:54:42
To: Shuff, Erica (EGLE)
Subject: Public Comment -Request for Redesignation to Attainment
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

To whom this may concern:

I'm writing to submit a public comment on EGLE's proposed addendum to the Request for Redesignation to Attainment the ozone NAAQS.

I have lived in Michigan my whole life and plan to spend a majority of the rest of my life here. I love this state for its natural beauty and the fact that we have sustained its beauty so well for so long as our greatest asset both aesthetically and economically.

That said, I'm ashamed to hear about EGLE's plans to skirt federal Clean Air Act requirements for air quality and ozone concentrations by taking advantage of the Trump administration's infamously lax enforcement of environmental regulations. Ozone is a lung irritant that has been shown to lead to increased risk of infection and chronic respiratory disease. Instead of changing the rules around us to allow southeast Michigan to reach EPA attainment status, we should be striving to achieve better air quality for the benefit of Detroit and its neighboring communities.

Don't allow Michigan to become another example to the nation of poor environmental health, as it did in 2014 with the Flint Water Crisis.

I am hopeful of a better environmental future for Michigan and its residents.
Thank you.
-[redacted]

Archived: Thursday, April 30, 2026 10:14:38 AM
From: [redacted]
Sent: Wednesday, April 22, 2026 9:01:24 PM
To: Shuff, Erica (EGLE)
Subject: Public Comment: Request for Redesignation to Attainment
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Dear Erica Shuff,

I'm writing to submit a public comment on EGLE's proposed addendum to the Request for Redesignation to Attainment the ozone NAAQS.

As a lifetime resident of Michigan, I am proud of my state and its natural beauty, which is its greatest asset, economically, aesthetically, and for the quality of life of its residents.

That said, I'm ashamed to hear about EGLE's plans to skirt federal Clean Air Act requirements for air quality and ozone concentrations by taking advantage of the Trump administration's infamously lax enforcement of environmental regulations. Ozone is a lung irritant that has been shown to lead to increased risk of infection and chronic respiratory disease. Instead of changing the rules around us to allow southeast Michigan to reach EPA attainment status, we should be striving to achieve better air quality for the benefit of Detroit and its neighboring communities.

Don't allow Michigan to become another example to the nation of poor environmental health, as it did in 2014 with the Flint Water Crisis.

Thank you,
[redacted]
Senior Field Manager
Clean Water Action, East Lansing Field Canvass

Archived: Thursday, April 30, 2026 10:14:40 AM
From: [redacted]
Mail received time: Tue, 21 Apr 2026 01:26:54
Sent: Tue, 21 Apr 2026 01:26:49
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

As a resident of Ann Arbor, with friends and relatives throughout SE Michigan, I'm shocked that the state government would seek to limit protections for air quality in our region. I have suffered from [redacted] in my life, and know that we need clear controls on air pollution from all sources.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing

required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Ann Arbor, MI 48105
[redacted]@umich.edu
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:14:43 AM
From: [redacted]
Mail received time: Mon, 20 Apr 2026 21:44:24
Sent: Mon, 20 Apr 2026 21:44:19
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

The most vulnerable people in our state do better. It's up to YOU to help protect them.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted].
Lansing, MI 48917
[redacted]@sierraclub.org
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:14:46 AM
From: [redacted]
Mail received time: Mon, 20 Apr 2026 12:19:33
Sent: Mon, 20 Apr 2026 12:19:30
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Please protect our air quality

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Detroit, MI 48207
[redacted]@gmail.com

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:14:49 AM
From: [redacted]
Mail received time: Sun, 19 Apr 2026 16:22:44
Sent: Sunday, April 19, 2026 12:22:45 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

We have so much pollution already from the highway ripping through our neighborhood and all the trucks from the industry down river. Routinely smelling sulfur and it can be hard to breathe outside. We need to make the air cleaner. Any step towards more pollution is absolutely unacceptable

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing

required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Detroit, MI 48216
[redacted]@gmail.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:14:52 AM
From: [redacted]
Mail received time: Sun, 19 Apr 2026 13:12:07
Sent: Sunday, April 19, 2026 9:12:08 AM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

I lived 23 years on the west side of Detroit, where early mornings was a noticeable smog as the sun came up , I figured I would move to Oakland county. Silly me , I moved to Waterford when at times as the same or worst air quality condition then Detroit . Special permits allowing concrete crushers to operate less then 500 feet away from homes and next to a high school . And EGLE responding waterfords AQ is fine from a monitor 18 miles away in oak park !!!! AQ is out of control and I still have [redacted] triggers and flare ups when AQ is high . I fear for our children's health, I have lasting injuries to my [redacted] because of pollution

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth

Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Waterford, MI 48329
[redacted]gmail.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:14:55 AM
From: [redacted]
Mail received time: Sat, 18 Apr 2026 21:30:35
Sent: Saturday, April 18, 2026 5:30:36 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

I am appalled that even though I have made several environmental agencies in SW Detroit as well as the City Council and EGLE aware multiple times since prior to 2009, the residents living across Livernois from the trucking container yard at west side of Livernois between Toledo & Federal has never been included in any mitigation whether it's enforcement of that yard to pave over all of the dirt piles and roads or mandating that tires be power washed when going in or going out of the yard! Nor have these residents been canvassed pertaining to their health and the filthy dust that continues to fill the air every day unless it rains or snows, and continues to cover their residences, making visibility through windows impossible! This is shameful and must not be allowed to continue!

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.

Flaws in EGLE's Current Strategy

1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.

--

It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.

Thank you for your consideration.

Sincerely,

[redacted]
Detroit, MI 48216
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:14:59 AM
From: [redacted]
Mail received time: Sat, 18 Apr 2026 20:49:08
Sent: Saturday, April 18, 2026 4:49:09 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Air Quality and its effect on human health is very important to me.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Ypsilanti, MI 48198
[redacted]@earthlink.net
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:15:02 AM
From: [redacted]
Mail received time: Sat, 18 Apr 2026 13:53:28
Sent: Saturday, April 18, 2026 9:53:29 AM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

My [redacted] get worse every year and my grandkids were diagnosed with [redacted] at 3 years old. How can you knowingly let this continue

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before

the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Hazel Park, MI 48030
[redacted]@yahoo.com
([redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:15:05 AM
From: [redacted]
Mail received time: Sat, 18 Apr 2026 12:42:18
Sent: Saturday, April 18, 2026 8:42:19 AM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Please do your j-o-b for the residents of Southwest Detroit & actually improve our air quality that we are breathing thus, actually reduce our ozone pollution & NOT just try to avoid air quality rules by asking the EPA to redesignate Wayne County & six others! STOP the poisoning of the air we have been breathing by redesignating it!!! Really IMPROVE the air quality; Require All Polluting Industries to Reduce their polluting emmisions!!!! This can be accomplished because EGLE did this with the Steel Industry where 6 out of the 7 Steel Companies cooperated & each company submitted a pollution reduction plan to do this action!

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy

1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Detroit, MI 48209
[redacted]@comcast.net
([redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:15:08 AM
From: [redacted]
Mail received time: Sat, 18 Apr 2026 04:47:04
Sent: Saturday, April 18, 2026 12:47:05 AM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

I have [redacted] My students have it. We have to take care of our air and water and earth. Rochester Hills and fighting for climate and health justice!

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before

the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Rochester Hills, MI 48309
[redacted]@oakland.edu
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:15:11 AM
From: [redacted]
Mail received time: Fri, 17 Apr 2026 23:27:20
Sent: Friday, April 17, 2026 7:27:21 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

I have lived in suburban Detroit for 69 years. Just stop being so profoundly ignorant of the devastation your decisions have on those of us that live here! Just stop holding us hostage so you can make more damn money! You folks make me sick because you are so short sighted!

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing

required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted].
Rochester Hills, MI 48307
[redacted]@yahoo.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:15:14 AM
From: [redacted]
Mail received time: Fri, 17 Apr 2026 21:41:37
Sent: Friday, April 17, 2026 5:41:38 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

As a 4th generation Michigan homeowner, I rely on our state's natural resources for my family's health and wellbeing.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Coloma, MI 49038
[redacted]@gmail.com

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:15:17 AM
From: [redacted]
Mail received time: Fri, 17 Apr 2026 18:53:49
Sent: Fri, 17 Apr 2026 18:53:46
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Do you not want people to breathe clean air. Do not lie.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Dearborn Heights, MI 48127
[redacted]@gmail.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:15:21 AM
From: [redacted]
Mail received time: Fri, 17 Apr 2026 18:28:15
Sent: Fri, 17 Apr 2026 18:28:11
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Please act on the side of abundant caution as opposed to the bare minimum when it comes to protecting the air we breathe.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Manchester, MI 48158
[redacted]@gmail.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:15:24 AM
From: [redacted]
Mail received time: Fri, 17 Apr 2026 02:20:30
Sent: Thursday, April 16, 2026 10:20:30 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

I am already suffering from the bad air quality and it's seriously affecting my life in a very negative manner. Same with my grandchildren. Often, the air is so bad that we have to stay in doors in the summer. Instead of getting outside, we have to worry if the air quality is too bad, which it often is. We need more protection for clean air, Not less

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing

required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Warren, MI 48089
[redacted]@yahoo.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:15:27 AM
From: [redacted]
Mail received time: Fri, 17 Apr 2026 00:46:00
Sent: Thursday, April 16, 2026 8:46:01 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

The common good of humanity!

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Farmington, MI 48162
[redacted]ihmsisters.org
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:15:30 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 20:33:33
Sent: Thursday, April 16, 2026 4:33:34 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

When I moved to Detroit a decade ago, I could not help but immediately feel the difference in air quality. Since then, I have [redacted] and I struggle when there is an active air alert. We need to make sure Detroiters have clean air and polluters are held accountable!

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing

required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Detroit, MI 48202
[redacted]gmail.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:15:33 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 18:59:00
Sent: Thursday, April 16, 2026 2:59:02 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Detroit still has a lot of work to do for it's recovery from the era of economic downturn. While there are many in the city who are benefiting from recent opportunities creating new jobs and improving neighborhoods, there are still many that are left behind, primarily areas with deep poverty. Economic challenges do not just manifest financially, but in terms of public health as well. There is an unacceptable number of the city's population who are suffering from health ailments that are either caused or exasperated by the quality of our air. Those conditions unfortunately necessitates more costs for healthcare, pitting people with financial choices that includes the option of living in poor health in order to meet other expenses. The state has an obligation to set, expect, and meet standards that match the needs of Michigan's people. Do not abandon those responsibilities in order to favor corporate needs. It isn't worth it and will create a miserable legacy.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy

needed to address severe air quality issues from diesel exhaust.

Flaws in EGLE's Current Strategy

1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.

2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.

3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.

--

It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.

Thank you for your consideration.

Sincerely,

[redacted]
Detrpot, MI 48216
[redacted]soulardarity.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:15:36 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 17:59:03
Sent: Thursday, April 16, 2026 1:59:04 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

The only way EGLE gets away with this is by making sure residents do not know about this redesignation. Change is coming. People are tired of coming second to big polluting companies' bottom lines. Health Before Wealth!

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before

the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Milan, MI 48160
[redacted]@gmail.com

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:15:39 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 17:30:11
Sent: Thursday, April 16, 2026 1:30:12 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

I am a community member who is directly impacted by air quality in southeastern Michigan.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Novi, MI 48375
[redacted]@msn.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:15:41 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 15:56:19
Sent: Thursday, April 16, 2026 11:56:20 AM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

As someone who has worked with Detroit residents on air quality monitoring in their homes through Wayne State University's Center for Urban Studies, I know that Detroit residents experience high levels of air incursion into their homes. The more polluted our city, the worse that air quality is inside. The poorest residents are hit hardest, they cannot afford new windows, air purifiers, and most of them rent, and their landlords do not make home improvements to help them.
Outside air is inside air.
Detroiter's need help to make the air cleaner, and suffer from high volumes of environmental toxins from manufacturing and emissions. It is on policymakers and our government to protect them.
Please be at the forefront of environmental justice for our city. Our residents need you.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy

needed to address severe air quality issues from diesel exhaust.

Flaws in EGLE's Current Strategy

1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.

2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.

3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.

--

It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.

Thank you for your consideration.

Sincerely,

[redacted]
Detroit, MI 48224
[redacted]@protonmail.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:15:44 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 15:47:19
Sent: Thursday, April 16, 2026 11:47:21 AM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Stop doing irreversible damage to Michigan's most vulnerable populations!

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
South Lyon, MI 48178
[redacted]@duck.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:15:46 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 15:42:13
Sent: Thursday, April 16, 2026 11:42:14 AM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

I am a non smoker yet I got [redacted] The surgeon believes it was environmental. Now I am down [redacted]. Further, due to poor air quality I can't go outside most of the summers. Instead I have to travel away from the area and have to seriously moving from my beloved Michigan due to poor air quality. I beg you to not loosen environmental regulations and go further to clean up our air .

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among

other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Northville, MI 48335
[redacted]@outlook.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:15:49 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 15:10:42
Sent: Thursday, April 16, 2026 11:10:44 AM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

I am disappointed that Michigan is doing so little in working for a clean and healthy environment.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Brighton, MI 48116
[redacted]yahoo.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:15:52 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 15:01:33
Sent: Thursday, April 16, 2026 11:01:34 AM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

My name is [redacted]. I live in Saline, MI 48176. I am writing because this is important to me. I personally surfer when the air quality is bad, as do a number of friends and family. We stay indoors; don't work or play in our yards, attend gatherings with family or friends, check the air quality before considering going to outdoor public events (concerts, fairs, markets, games, etc.). All of this diminishes our lives and has an effect on how these various events turnout. Just to name one example: when the air quality is poor fewer people attend outdoor shows and markets, meaning that sales will be lower, and the income of sellers and promoters/sponsors will also be lower.

It may not seem to you like this is a big deal, but the worse the air quality gets the more people will be harmed by it.

Thank you for your consideration.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the

ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.

Flaws in EGLE's Current Strategy

1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.

--

It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.

Thank you for your consideration.

Sincerely,

[redacted]
Saline, MI 48176
[redacted]@gmail.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:15:54 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 14:03:08
Sent: Thursday, April 16, 2026 10:03:10 AM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

We must protect our state along with citizens

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Royal oak, MI 48214
[redacted]@tlclinton.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:15:57 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 13:56:31
Sent: Thursday, April 16, 2026 9:56:33 AM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Detroit children deserve clean air!

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Ann Arbor, MI 48103
[redacted]@sierraclub.org
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:16:00 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 13:48:48
Sent: Thu, 16 Apr 2026 13:48:45
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

This impacts everyone and everything. Do right.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted].
West Bloomfield, MI 48322
[redacted]umich.edu
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:16:10 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 13:05:11
Sent: Thursday, April 16, 2026 9:05:12 AM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Living in Detroit the past two years I often notice days where you can smell air pollution and often wonder how the air quality affects my health, specifically regarding [redacted] It is constantly concerning that there is not only the concentrated pollution in the 48217 area and Zug Island but also coming from the Stellantis plant on the north side of the city. It is even more concerning that at a time when cleaner energy sources and manufacturing processes are obtainable there seems to continue to be a profit over people agenda, even from agencies that should exist to ensure cleaner air and act through a scientific lens, not as a political or corporate puppet.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy

1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Detroit, MI 48214
[redacted]@gmail.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:16:13 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 12:47:18
Sent: Thursday, April 16, 2026 8:47:19 AM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

We, your constituency, seek appropriate representation.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Grosse Pointe Farms, MI 48236
[redacted]att.net
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:16:16 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 12:45:39
Sent: Thursday, April 16, 2026 8:45:40 AM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Good Morning EGLE. I attended nursing school @ The Grace Hospital School of Nursing from 1972-1975. I remember driving into the city with an orange haze over the horizon. I remember spending nights sitting up in a chair when air quality was so bad because my breathing was so heavy. I remember wiping down my window sills covered with black particulate matter…doing this several times a week. I remember wondering what damage was I doing to my lungs. I remember people with lung trouble flocking to the hospital when air quality was so poor. I remember thinking, I can't live here….and I didn't . I left after nursing school working in more northern parts of the state including the UP of Michigan. Now I'm back in the area living near my daughter's family and their 1 year old. How can you even consider undoing all the work done by the clean air and water Acts? We only have one planet. We need to safe guard this planet. With out clean air and water none of us can survive.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy

needed to address severe air quality issues from diesel exhaust.

Flaws in EGLE's Current Strategy

1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.

2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.

3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.

--

It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.

Thank you for your consideration.

Sincerely,

[redacted]
Oak Park, MI 48237
[redacted]gmail.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:16:20 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 11:24:36
Sent: Thursday, April 16, 2026 7:24:37 AM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Pollution must be reduced!

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Belleville, MI 48111
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:16:23 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 10:23:09
Sent: Thursday, April 16, 2026 6:23:10 AM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Southeast Michigan residents want better air quality, NOT more ozone. Please protect our air.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Ann Arbor, MI 48105
[redacted]gmail.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:16:26 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 08:34:54
Sent: Thursday, April 16, 2026 4:34:55 AM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Stop kicking the can down the road and leaving it for our children and grand children to clean up!

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Newport, MI 48166
[redacted]cbainc.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:16:29 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 08:10:41
Sent: Thursday, April 16, 2026 4:10:43 AM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

I have lived in the Metro Detroit area for nearly 70 years. I would like to see tougher air quality laws, not weaker ones.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Saint Clair Shores, MI 48082
[redacted]@gmail.com
([redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:16:33 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 07:26:24
Sent: Thursday, April 16, 2026 3:26:25 AM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

I can't believe that EGLE wants to abandon Detroit's air quality rules! Anyone living wants clean air to breathe. I am grateful for an organization like the Sierra Club for standing up for all those who can't do it for themselves, yet are suffering. Please note the importance of the above message to those living in Detroit 48205!
Thank you,
[redacted]

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth

Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Waterford, MI 48327
[redacted]@yahoo.com

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:16:35 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 02:40:54
Sent: Wednesday, April 15, 2026 10:40:55 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Clean air is not a choice it is a right. I am a doctor licensed in michigan and this allowing of air quality degradation in unacceptable/

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before

the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
West Bloomfield, MI 48322
[redacted]@yahoo.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:16:39 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 02:05:59
Sent: Wednesday, April 15, 2026 10:06:00 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Residents of Detroit deserve clean air. Rates of asthma are above the national average.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Novi, MI 48375
[redacted]yahoo.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:16:42 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 01:29:02
Sent: Thu, 16 Apr 2026 01:28:57
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

I understand the reason behind our beautiful sunsets!

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Ann Arbor, MI 48103
[redacted]gmail.com

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:16:45 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 01:27:50
Sent: Wednesday, April 15, 2026 9:27:51 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

As a senior citizen who enjoys the outdoors, please consider clean air as a top priority for all !

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Farmington, MI 48336
[redacted]icloud.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:16:48 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 01:23:43
Sent: Wednesday, April 15, 2026 9:23:44 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

My name is [redacted]. I live in Ferndale, Mi and spend lots of time in Detroit. I am writing as a community member who is directly affected by air quality in Southeast Michigan. Children and adults in our community deserve clean air. With the costs of healthcare hardworking parents cannot afford emergency room visits. The arms rate is our area is 11x the state average. We need to rein in pollution so we can breath easy. Please help.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among

other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Ferndale, MI 48220
[redacted]gmail.com

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:16:51 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 01:20:51
Sent: Wednesday, April 15, 2026 9:20:52 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

We are directly impacted by the worsening air quality in Grosse pointe Farms. We look at the numbers each day get worse and worse as our health declines. Asthma, headaches. Cardio vascular decline.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before

the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Grosse Pointe Farms, MI 48224
[redacted]aol.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:16:54 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 00:47:59
Sent: Wednesday, April 15, 2026 8:48:00 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Clean air & water are critical to all life! It is imperative that air quality standards be maintained or better yet, made more stringent! Enforcement is critical!

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before

the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Dearborn, MI 48124
[redacted]yahoo.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:16:57 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 00:31:40
Sent: Wednesday, April 15, 2026 8:31:41 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

I live in Detroit. My neighbor, [redacted] who lived [redacted] died from a [redacted]. [redacted] loved his community, new and old neighbors alike. He should still be here with us enjoying his garden and friends. We live with ongoing exposures and cumulative impacts from polluting facilities and diesel exhaust. I'm raising four children and I am concerned for their long-term respiratory health. We fought to shut down the incinerator and we are planting trees to help clean our air. But, we know it's not enough. We need strong action from EGLE and EPA to protect our right to breathe clean air.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth

Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Detroit, MI 48211
[redacted]ecocenter.org
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:17:00 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 00:13:51
Sent: Wednesday, April 15, 2026 8:13:51 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Reduce Pollution

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Milford, MI 48381
[redacted]@gmail.com

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:17:03 AM
From: [redacted]
Mail received time: Thu, 16 Apr 2026 00:03:49
Sent: Wednesday, April 15, 2026 8:03:50 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Keep Michigan clean

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Walled Lake, MI 48390
[redacted]gmail.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:17:07 AM
From: [redacted]
Mail received time: Wed, 15 Apr 2026 23:55:29
Sent: Wednesday, April 15, 2026 7:55:30 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Detroit's **48205 zip code** has Michigan's highest asthma hospitalization rate—**11 times** the state average. This crisis is documented at **Osborn High School**, where monitors repeatedly exceed federal health standards. The cost of this failure is generational: children exposed to elevated ozone in their first two years are **31% more likely** to develop asthma by age six. If we stop EGLE, it will finally give us the power to **rein in pollution** and hold industry accountable. We must prioritize our children's health over industrial convenience.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy

1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Plymouth, MI 48170
[redacted]gmail.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:17:10 AM
From: [redacted]
Mail received time: Wed, 15 Apr 2026 23:19:12
Sent: Wed, 15 Apr 2026 23:19:07
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

There's no excuse for allowing more air pollution to the most beautiful state in the union. Unacceptable!

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Clawson, MI 48017
[redacted]yahoo.com

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:17:14 AM
From: [redacted]
Mail received time: Wed, 15 Apr 2026 22:34:16
Sent: Wednesday, April 15, 2026 6:34:17 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Why isn't health a priority with our state? It's inexcusable that we continue without taking into account all the adverse effects this proposed Draft Addendum would do. I live in an area with high vehicle traffic and not only the noise but the pollution is out of control.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing

required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Canton, MI 48187
[redacted]sbcglobal.net
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:17:17 AM
From: [redacted]
Mail received time: Wed, 15 Apr 2026 22:21:38
Sent: Wednesday, April 15, 2026 6:21:40 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Save our environment, people's lives, & health care costs!

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Gregory, MI 48137
[redacted]emich.edu
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:17:20 AM
From: [redacted]
Mail received time: Wed, 15 Apr 2026 22:15:26
Sent: Wednesday, April 15, 2026 6:15:27 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Please don’t let us go backward on air quality impacts!

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Ann Arbor, MI 48103
[redacted]comcast.net
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:17:23 AM
From: [redacted]
Mail received time: Wed, 15 Apr 2026 22:07:00
Sent: Wednesday, April 15, 2026 6:07:01 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Stop allowing our state's people to be poisoned. #1 in the US for Asthma, which kills people, is dispicable. There is no way this is acceptable. The air quality is bad, without the Canadian wildfires.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before

the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Ferndale, MI 48220
[redacted]gmail.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:17:26 AM
From: [redacted]
Mail received time: Wed, 15 Apr 2026 22:02:42
Sent: Wednesday, April 15, 2026 6:02:42 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

We all need clean air

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Redford, MI 48239
[redacted]yahoo.com

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:17:29 AM
From: [redacted]
Mail received time: Wed, 15 Apr 2026 21:40:50
Sent: Wednesday, April 15, 2026 5:40:51 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Please withdraw the Draft Addendum to the Request for Redesignation and instead focus on real, enforceable measures that reduce ozone-forming pollution from power plants, industrial facilities, and transportation in Southeast Michigan. We have some of the highest asthma hospitalization rates in the country for children so clearly this hasn't been a priority and it must be. Do the right hung for the people of Michigan who depend on you deserve this.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among

other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Bingham Farms, MI 48025
[redacted]yahoo.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:17:32 AM
From: [redacted]
Mail received time: Wed, 15 Apr 2026 21:16:15
Sent: Wednesday, April 15, 2026 5:16:16 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

This is insane. The communities of southeast Michigan will not stand idly by and let EGLE avoid their obligations to lower ozone levels when Detroit has the highest asthma rates in the country — a scientific fact.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before

the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Detroit, MI 48208
[redacted]@sierraclub.org

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:17:35 AM
From: [redacted]
Mail received time: Wed, 15 Apr 2026 21:14:32
Sent: Wednesday, April 15, 2026 5:14:33 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

EGLE needs to follow the law and take real measures to lower pollution in southeast Michigan.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Livonia, MI 48150
[redacted]@gmail.com

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:17:38 AM
From: [redacted]
Mail received time: Wed, 15 Apr 2026 21:10:12
Sent: Wednesday, April 15, 2026 5:10:13 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Please PLEASE do not ignore the climate changes issues!! WE can't go back!!

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Clarkston, MI 48346
[redacted]comcast.net
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:17:41 AM
From: [redacted]
Mail received time: Wed, 15 Apr 2026 21:03:30
Sent: Wednesday, April 15, 2026 5:03:31 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Detroit's 48205 zip code already has the highest asthma hospitalization rate in Michigan -- 11 times the state average. It's inhumane to consider making that statistic worse.
The East 7 Mile ozone monitor at Osborn High School has repeatedly exceeded the federal health-based standard.
Children exposed to elevated ozone in their first two years of life are 31% more likely to develop asthma by ages 4-6. This is a public health issue, and people's quality of life shouldn't suffer even MORE due to industry.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth

Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Detroit, MI 48228
[redacted]gmail.com

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:17:43 AM
From: [redacted]
Mail received time: Wed, 15 Apr 2026 21:02:18
Sent: Wednesday, April 15, 2026 5:02:19 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Aw c'mon guys!!! The EPA and EGLE have been stewards and front runners for the environment in Michigan.... at least until this Chump took over and demolished all the progress we have made in 30+ years. Now, with healthcare in the toilet, you are considering reducing and/or eliminating our totally attainable Ozone reduction and air quality standards programs, NOx and VOCs, and subjucting 7 counties to increased respiratory health challenges. Our children and elderly are most at risk and will be hurt the most ; not to mention an increase in new respiratory illness cases. We have helped put you in your positions. Listen to us, fight for us. People not profit! And certainly not to do Chump's bidding! This will affect you and your family as well. Think.... and act with integrity and courage for the good of all people.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.

Flaws in EGLE's Current Strategy

1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.

--

It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.

Thank you for your consideration.

Sincerely,

[redacted]
Novi, MI 48375
[redacted]@gmail.com

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:17:46 AM
From: [redacted]
Mail received time: Wed, 15 Apr 2026 21:01:43
Sent: Wednesday, April 15, 2026 5:01:44 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

My name is [redacted]. I live in Ann Arbor, MI 48103. I am writing as a concerned citizen, a former resident of Detroit, and the wife of physician who works in the Detroit area, and who suffers from [redacted] It is high time for ozone limits to be strictly enforced in the seven-county Southeast Michigan area. Time and again I consult my weather app to see if ozone levels are safe for outdoor activity, only to be told that they aren't. This interferes with family health both directly, and indirectly by preventing us from getting adequate exercise. We need the EPA to enforce ozone limits now.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth

Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Ann Arbor, MI 48103
[redacted]umich.edu
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:17:49 AM
From: [redacted]
Mail received time: Wed, 15 Apr 2026 20:59:58
Sent: Wednesday, April 15, 2026 5:00:00 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Air quality must be improved for all Detroiters but especially the children.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Bloomfield Twp, MI 48302
[redacted]@gmail.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:17:52 AM
From: [redacted]
Mail received time: Wed, 15 Apr 2026 20:58:34
Sent: Wednesday, April 15, 2026 4:58:35 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Stepping backward from air quality efforts in Detroit and effectively declaring that ozone and smoke are just fine or giving up and saying "we can't fix it" is an awful policy. I've suffered from [redacted] my whole adult life and when it was bad, it was very debilitating. And I live in Washtenaw County with generally better air quality and I have been fortunate to have excellent health care for my [redacted] A LOT of kids in Detroit are not so lucky. My daughter and her husband are trying to have kids and they live in Detroit, just north of 7 mile. This not good new for them or my future grandkids!

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth

Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Milan, MI 48160
[redacted]reinhartrealtors.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:17:54 AM
From: [redacted]
Mail received time: Wed, 15 Apr 2026 20:58:23
Sent: Wednesday, April 15, 2026 4:58:24 PM
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

It matters that we can breathe air safely.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Ann Arbor, MI 48103
[redacted]duck.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:17:57 AM
From: [redacted]
Mail received time: Wed, 22 Apr 2026 23:36:26
Sent: Wed, 22 Apr 2026 23:36:22
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

I am in direct opposition to this addendum. Exceedances of the ozone standard, regardless of the influence of wildfires or not, result in real-life, negative health impacts. These health harms are difficult to monetize and those impacted are often powerless in comparison to the influence of industry and their economic arguments. I feel any opportunity that EGLE has to provide deeper protections to the environment and public health, it should take it. Data mining to avoid control measures to improve air quality for public health is a disappointment. The argument was made that vehicle emissions testing would be costly to residents and result in little benefit; If this truly is the case, then propose another RACT solution that will have more meaningful and tangible impacts. The mission and duty of EGLE's AQD is to protect the air we breathe, not make it moderately healthier to appease industry and SEMCOG while doing to bare minimum to meet NAAQS. Again, I fully oppose this action.

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy

needed to address severe air quality issues from diesel exhaust.

Flaws in EGLE's Current Strategy

1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.

2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.

3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.

--

It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.

Thank you for your consideration.

Sincerely,

[redacted]
Manchester, MI 48158
[redacted]gmail.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Archived: Thursday, April 30, 2026 10:18:00 AM
From: [redacted]
Mail received time: Tue, 21 Apr 2026 04:51:27
Sent: Tue, 21 Apr 2026 04:51:24
To: Shuff, Erica (EGLE)
Subject: Reduce ozone pollution in the Detroit region
Importance: Normal
Sensitivity: None

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Dear EGLE,

I am writing to urge the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to withdraw its Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for the Southeast Michigan Nonattainment Area, and instead to focus the Department's resources on meaningful, enforceable measures that will reduce ozone pollution in the seven-county nonattainment area.

I urge EGLE to:
1. Complete Michigan's outstanding Moderate nonattainment obligations, including issuing RACT emissions standards for major NOx sources in the seven-county area.
2. Identify and implement additional enforceable emission reduction measures for stationary sources of NOx and VOCs in the seven-county nonattainment area, including power plants, industrial facilities, and refineries.
- Prioritize on-the-ground emission reductions in the communities bearing the highest ozone and asthma burden, including Detroit's Eastside and the area surrounding the East 7 Mile monitor.
3. Lower transportation-related ozone pollution, including by:
- Working with MDOT, SEMCOG, and local partners to reduce ozone-forming pollution from the transportation sector, particularly heavy-duty diesel trucks operating in and around Detroit's most overburdened neighborhoods and along port and freight corridors.
- Adopting an Indirect Source Rule (ISR) rule for Southeast Michigan that requires large traffic-generating facilities to mitigate the ozone-forming emissions (NOx and VOCs) associated with the truck, and cargo-handling activity they attract. This version of the ISR is based on South Coast AQMD Rule 2305, and provides a proven model that EGLE has clear authority to adapt for Michigan. Similar concepts are being considered in Illinois, New York, and New Jersey, and exemplify exactly the kind of policy needed to address severe air quality issues from diesel exhaust.
Flaws in EGLE's Current Strategy
1. A federal court already rejected this redesignation and Michigan still hasn't done what it requires. In December 2025, the Sixth Circuit vacated EPA's 2023 approval, finding Michigan had not met the Clean Air Act's requirements for redesignation. Among other things, Michigan has not fulfilled its obligations under the area's Moderate nonattainment classification -- including issuing required emissions standards (RACT) for large NOx sources. The court made clear those requirements must be satisfied before the area can be redesignated. EGLE is nonetheless moving forward with another redesignation request without completing that

work. EGLE should do the cleanup the Clean Air Act requires, not relitigate a decision it lost.
2. This proposal ignores a public health crisis. Detroit was named the #1 asthma capital in the U.S. in 2022 and 2025. In the 48205 zip code -- home to the East 7 Mile monitor at Osborn High School -- asthma hospitalizations jumped over 65% from 2019–2021 to 2021–2023, roughly eleven times the state average, and the monitor keeps exceeding the federal ozone standard.
3. Blaming wildfire smoke is not a pollution control strategy. Exceptional event demonstrations don't reduce a single ton of in-state ozone. Southeast Michigan has controllable NOx and VOC sources -- power plants, industrial facilities, refineries, and heavy-duty diesel trucks in Detroit's freight corridors -- that EGLE has authority to regulate more strictly. EGLE itself has acknowledged that downward ozone trends have flattened. That's a signal to tighten controls, not chase a designation change.
--
It is unacceptable for Michigan to pass up the chance to hold polluters to higher standards in Southeast Michigan when Detroit has the worst air-quality health outcomes in the country. I urge EGLE to withdraw the Draft Addendum and get to work reducing ozone pollution in Southeast Michigan.
Thank you for your consideration.

Sincerely,

[redacted]
Grosse Pointe Farms, MI 48236
[redacted]gmail.com
[redacted]

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Attachment C. EGLE Calendar Notice - March 23, 2026

Michigan Department of Environment, Great Lakes, and Energy (EGLE)

Beginning of public comment period for the Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for Southeast Michigan Nonattainment Area

MONDAY, MARCH 23, 2026

The Michigan Department of Environment, Great Lakes, and Energy's (EGLE) Air Quality Division is seeking public comment on the Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard (NAAQS) and Revision to Michigan's State Implementation Plan (SIP) and Ozone Maintenance Plan for the Southeast Michigan Ozone Nonattainment Area.

The proposed revision can be viewed at EGLE-State Implementation Plan (SIP) and Attainment website.

A virtual public hearing will be held on April 22, 2026, at 6:00 p.m. EDT, **only if requested by April 8, 2026**.

Submit comments to:

Erica Shuff
Air Quality Division
Michigan Department of Environment, Great Lakes, and Energy
P.O. Box 30260
Lansing, Michigan 48909-7760

or by email at ShuffE@Michigan.gov.

This public notice is given in accordance with federal regulations for the SIP.

Information contact: Erica Shuff, Air Quality Division, ShuffE@Michigan.gov.

Location	N/A
Event Type	Public Comment Periods
Public comment begins	Monday, March 23, 2026 8:00 AM
Public comment ends	Wednesday, April 22, 2026 11:59 PM
Counties	Livingston, Macomb, Monroe, Oakland, St. Clair, Washtenaw, Wayne
Divisions	Air Quality Division
Information contact	Erica Shuff
Information contact email	ShuffE@michigan.gov

Information contact mailing address	Air Quality Division Michigan Department of Environment, Great Lakes, and Energy P.O. Box 30260 Lansing, Michigan 48909-7760
Link	www.michigan.gov…

Events calendar powered by Trumba

Printed: Tuesday, April 21, 2026 at 8:04 AM PDT

Attachment D. AQD Public Notice - March 23, 2026

MICHIGAN DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY

Public Notice for Air Quality Rules and State Implementation Plans

The Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) has portions of its State Implementation Plan (SIP) and/or Air Pollution Control Rules open for comment from the public. The complete Michigan SIP is a cumulative record of hundreds of documents developed in phases and for various purposes over many years. As federal requirements change, States must add to, delete from, or revise components in the SIP. The Michigan SIP contains rules, statutes, permits, consent orders, plans, emissions inventories, and budgets. The plan also contains binding commitments to take future actions under specific circumstances. Michigan's Air Pollution Control Rules are made up of multiple "parts," each covering its own subject matter and/or pollutants, which often need updating. It is also possible the AQD needs to create new rules to address air quality issues in the state. More information on any actions open for comment is listed below.

The following action(s) are open for comment as indicated in their respective announcements:

Public Comment Period for the Draft Wildfire Exceptional Event Demonstration for Ground-Level Ozone in Southeast Michigan - Oak Park and Port Huron Monitors.....1

Public Comment Period for the Draft Addendum to the Michigan State Implementation Plan for the West Michigan Serious Elements of the 2015 Ozone National Ambient Air Quality Standard.....3

Public Comment Period for the Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard and Revision to Michigan's State Implementation Plan and Ozone Maintenance Plan for Southeast Michigan Ozone Nonattainment Area 4

Public Comment Period for the Draft Wildfire Exceptional Event Demonstration for Ground-Level Ozone in Southeast Michigan - Oak Park and Port Huron Monitors

EGLE opened a public comment period on the draft Exceptional Event (EE) demonstration on March 2, 2026, which will remain open until 11:59 p.m. EDT on April 1, 2026. The purpose of the public comment period is to allow all interested parties an opportunity to comment on the draft Exceptional Event demonstration.

Draft Exceptional Event Demonstration:

- Draft Wildfire Exceptional Event Demonstration for Ground-Level Ozone in the Southeast Michigan - Oak Park and Port Huron Monitors

In the draft EE demonstration, the AQD of EGLE has analyzed weather and air quality data and determined that smoke from Canadian wildfires during episodes in June 2023 and July 2025 adversely affected ozone concentration causing elevated ozone values

on three days at the Oak Park and Port Huron monitors. Due to this influence, the AQD is proposing to request that the United States Environmental Protection Agency exclude this ozone data from regulatory determinations.

The public is encouraged to review the proposed documents which can be found posted on our EGLE – State Implementation Plan (SIP) and Attainment page under *SIP Proposed Documents and Final Submittals* and present comments through the end of the public comment period. All statements received during the public comment period will be considered by the AQD. After consideration, EGLE may submit the SIP to the United States Environmental Protection Agency as written, submit it with minor revisions, or make major changes that will require a repeat of the public comment period.

Submitting Comments:

There are several ways to submit comments on the draft Exceptional Event demonstration.



Email your comment to HengesbachS1@Michigan.gov.
Please include "Comments on EE Demo" in the subject line.



Mail your comment to Stephanie Hengesbach, EGLE, Air Quality Division, SIP Development Unit, P.O. Box 30260, Lansing, Michigan 48909-7760.

Individuals without internet access and who are interested in receiving printed copies of the documents related to the draft Exceptional Event demonstration should contact Kaitlyn DeVries at 517-599-1938 or DevriesK1@Michigan.gov.

This public notice is given in accordance with federal regulations for Exceptional Event demonstrations.

Public Comment Period for the Draft Addendum to the Michigan State Implementation Plan for the West Michigan Serious Elements of the 2015 Ozone National Ambient Air Quality Standard - Reasonably Available Control Technology Requirements for Volatile Organic Compounds and Oxides of Nitrogen

EGLE opened a public comment period on the draft Addendum to the Michigan SIP for the West Michigan Serious Elements of the 2015 Ozone National Ambient Air Quality Standard ("Draft Addendum") on March 23, 2026, which will remain open until 11:59 p.m. EDT on April 23, 2026. The purpose of the public comment period and virtual public hearing, to be held only if requested by April 9, 2026, is to allow all interested parties an opportunity to comment on the draft Addendum.

Draft Addendum:

- Draft Addendum to the Michigan State Implementation Plan for the West Michigan Serious Elements of the 2015 Ozone National Ambient Air Quality Standard - Reasonably Available Control Technology Requirements for Volatile Organic Compounds and Oxides of Nitrogen
- Attachments A-B
- Attachment C
- Attachments D-J

In the draft Addendum, the AQD has compiled an oxides of nitrogen (NOx) waiver demonstration for two western Michigan 2015 ozone nonattainment areas (Berrien County ["Berrien"] and partial-county area of Muskegon County ["Muskegon"]), a negative declaration report for "major" sources of volatile organic compounds (VOC) in the partial-county area of Muskegon County, and a reasonably available control technology (RACT) demonstration for several "major" sources of VOCs in Berrien County under the "serious" nonattainment classification for the 2015 ozone national ambient air quality standard (NAAQS). This complete package, once submitted to and approved by the United States Environmental Protection Agency (USEPA), will fulfill Michigan's remaining "serious" attainment planning requirements for Berrien and Muskegon.

The public is encouraged to review the proposed documents which can be found posted on our EGLE – State Implementation Plan (SIP) and Attainment page under *SIP Proposed Documents and Final Submittals* and present comments through the end of the public comment period. All statements received during the public comment period will be considered by the AQD. After consideration, EGLE may submit the SIP to the USEPA as written, submit it with minor revisions, or make major changes that will require a repeat of the public comment period.

Submitting Comments:

There are several ways to submit comments on the draft Addendum.

Email your comment to OlsonJ12@Michigan.gov.

Please include "Comments on Draft Addendum" in the subject line.

Mail your comment to John Olson, EGLE, Air Quality Division, SIP Development Unit, P.O. Box 30260, Lansing, Michigan 48909-7760.

If requested in writing by April 9, 2026, a virtual public hearing will be held on April 23, 2026, starting at 6:00 p.m. EDT, with information on how to attend posted on the AQD's webpage at Michigan.gov/EGLEAirPublicNotice. If requested, the virtual public hearing may be preceded by an informational session.

Individuals without internet access and who are interested in receiving printed copies of the documents related to the draft Addendum should contact Kaitlyn DeVries at 517-599-1938 or DevriesK1@Michigan.gov.

This public notice is given in accordance with federal regulations for the SIP.

Public Comment Period for the Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard and Revision to Michigan's State Implementation Plan and Ozone Maintenance Plan for Southeast Michigan Ozone Nonattainment Area

EGLE opened a public comment period for a draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard and Revision to Michigan's State Implementation Plan and Ozone Maintenance Plan for Southeast Michigan Ozone Nonattainment Area ("Draft Addendum") on March 23, 2026, which will remain open until 11:59 p.m. EDT on April 22, 2026. The purpose of the public comment period and virtual public hearing, if requested by April 8, 2026, is to allow all interested parties an opportunity to comment on the Draft Addendum.

Draft Addendum:

- Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard and Revision to Michigan's State Implementation Plan and Ozone Maintenance Plan for Southeast Michigan Ozone Nonattainment Area

In the draft Addendum, the AQD is seeking public comment on Michigan's Addendum to the January 2022 Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard and Revision to Michigan's State Implementation Plan and Ozone Maintenance Plan for the Southeast Michigan Ozone Nonattainment Area. The Request for Redesignation was submitted to the United States Environmental Protection Agency (USEPA) on January 3, 2022. The USEPA acted on the Request for Redesignation on May 19, 2023. However, based on events that have occurred since that time, EGLE requests the USEPA reconsider the Request for Redesignation for the southeast Michigan nonattainment area.

The public is encouraged to review the proposed documents which can be found posted on our EGLE – State Implementation Plan (SIP) and Attainment page under *SIP Proposed Documents and Final Submittals* and present comments through the end of the public comment period. All statements received during the public comment period will be considered by the AQD. After consideration, EGLE may submit the SIP to the USEPA as written, submit it with minor revisions, or make major changes that will require a repeat of the public comment period.

Submitting Comments:

There are several ways to submit comments on the proposed SIP revisions.



Email your comment to ShuffE@Michigan.gov. Please include "Comments on SIP Revision" in the subject line.



Mail your comment to Erica Shuff, EGLE, Air Quality Division, SIP Development Unit, P.O. Box 30260, Lansing, Michigan 48909-7760.



At a virtual public hearing, if held.

If requested in writing by April 8, 2026, a virtual public hearing will be held on April 22, 2026, at 6:00pm, with information on how to attend posted on the AQD's webpage at Michigan.gov/EGLEAirPublicNotice. If requested, the virtual public hearing may be preceded by an informational session.

Individuals without internet access and who are interested in receiving printed copies of the documents related to the draft Addendum or who need accommodations or other assistance to effectively participate in the hearing (if requested) should contact Kaitlyn DeVries at 517-599-1938 or DevriesK1@Michigan.gov.

This public notice is given in accordance with federal regulations for the SIP.

EGLE promotes the equitable treatment and meaningful involvement of Michigan's residents regarding the development, implementation, and enforcement of laws, regulations, and policies. Equitable treatment means that no group of people bears a disproportionate share of the negative consequences resulting from governmental, industrial, or commercial operations and policies. Meaningful involvement means all people have an opportunity to participate in decisions that affect their environment and/or health.

EGLE does not discriminate on the basis of race, sex, religion, age, national origin, color, marital status, disability, political beliefs, height, weight, genetic information, or sexual orientation in the administration of any of its programs or activities, and prohibits intimidation and retaliation, as required by applicable laws and regulations.

Attachment E. EGLE Calendar Notice - April 13, 2026

Michigan Department of Environment, Great Lakes, and Energy (EGLE)

Virtual Public Hearing for the Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard for Southeast Michigan Nonattainment Area

WEDNESDAY, APRIL 22, 2026, 6 – 11:55PM

Attend the virtual informational session and public hearing on April 22, 2026, or join by calling 855-758-1310 and using the webinar ID: 847 4896 8640.

- Pre-registration is **not** required to attend.
- To participate, click the link above at the start of the event (6:00 p.m.).

For more information and documents, visit our Public Comment webpage at: Michigan.gov/EGLEAirPublicNotice.

Information contact: Erica Shuff, Air Quality Division, 517 897-0791 or ShuffE@Michigan.gov.

Individuals needing language assistance or accommodations for effective participation at the virtual hearing should contact Kaitlyn DeVries at 517-599-1938 or DevriesK1@Michigan.gov by **April 14, 2026**, to request language, mobility, visual, hearing, translation, and/or other assistance.

Location	Online meeting via Zoom
Event Type	Public Hearings and Meetings
Counties	Livingston, Macomb, Monroe, Oakland, St. Clair, Washtenaw, Wayne
Divisions	Air Quality Division
Information contact	Erica Shuff
Information contact email	ShuffE@michigan.gov
Information contact phone	517 897-0791
Link	www.michigan.gov…

Events calendar powered by Trumba

Printed: Tuesday, April 21, 2026 at 8:02 AM PDT

Attachment F. AQD Public Notice - April 13, 2026

MICHIGAN DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY

Public Notice for Air Quality Rules and State Implementation Plans

The Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) has portions of its State Implementation Plan (SIP) and/or Air Pollution Control Rules open for comment from the public. The complete Michigan SIP is a cumulative record of hundreds of documents developed in phases and for various purposes over many years. As federal requirements change, States must add to, delete from, or revise components in the SIP. The Michigan SIP contains rules, statutes, permits, consent orders, plans, emissions inventories, and budgets. The plan also contains binding commitments to take future actions under specific circumstances. Michigan's Air Pollution Control Rules are made up of multiple "parts," each covering its own subject matter and/or pollutants, which often need updating. It is also possible the AQD needs to create new rules to address air quality issues in the state. More information on any actions open for comment is listed below.

The following action(s) are open for comment as indicated in their respective announcements:

Public Comment Period for the Draft Addendum to the Michigan State Implementation Plan for the West Michigan Serious Elements of the 2015 Ozone National Ambient Air Quality Standard - Reasonably Available Control Technology Requirements for Volatile Organic Compounds and Oxides of Nitrogen 1

Public Comment Period for the Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard and Revision to Michigan's State Implementation Plan and Ozone Maintenance Plan for Southeast Michigan Ozone Nonattainment Area 3

Public Comment Period for the Draft Addendum to the Michigan State Implementation Plan for the West Michigan Serious Elements of the 2015 Ozone National Ambient Air Quality Standard - Reasonably Available Control Technology Requirements for Volatile Organic Compounds and Oxides of Nitrogen

EGLE opened a public comment period on the draft Addendum to the Michigan SIP for the West Michigan Serious Elements of the 2015 Ozone National Ambient Air Quality Standard ("Draft Addendum") on March 23, 2026, which will remain open until 11:59 p.m. EDT on April 23, 2026. The purpose of the public comment period and virtual public hearing, to be held only if requested by April 9, 2026, is to allow all interested parties an opportunity to comment on the draft Addendum.

Draft Addendum:

- Draft Addendum to the Michigan State Implementation Plan for the West Michigan Serious Elements of the 2015 Ozone National Ambient Air Quality Standard - Reasonably Available Control Technology Requirements for Volatile Organic Compounds and Oxides of Nitrogen

- Attachments A-B
- Attachment C
- Attachments D-J

In the draft Addendum, the AQD has compiled an oxides of nitrogen (NOx) waiver demonstration for two western Michigan 2015 ozone nonattainment areas (Berrien County [“Berrien”] and partial-county area of Muskegon County [“Muskegon”]), a negative declaration report for “major” sources of volatile organic compounds (VOC) in the partial-county area of Muskegon County, and a reasonably available control technology (RACT) demonstration for several “major” sources of VOCs in Berrien County under the “serious” nonattainment classification for the 2015 ozone national ambient air quality standard (NAAQS). This complete package, once submitted to and approved by the United States Environmental Protection Agency (USEPA), will fulfill Michigan’s remaining “serious” attainment planning requirements for Berrien and Muskegon.

The public is encouraged to review the proposed documents which can be found posted on our EGLE – State Implementation Plan (SIP) and Attainment page under *SIP Proposed Documents and Final Submittals* and present comments through the end of the public comment period. All statements received during the public comment period will be considered by the AQD. After consideration, EGLE may submit the SIP to the USEPA as written, submit it with minor revisions, or make major changes that will require a repeat of the public comment period.

Submitting Comments:

There are several ways to submit comments on the draft Addendum.



Email your comment to OlsonJ12@Michigan.gov.
Please include “Comments on Draft Addendum” in the subject line.



Mail your comment to John Olson, EGLE, Air Quality Division, SIP Development Unit, P.O. Box 30260, Lansing, Michigan 48909-7760.

If requested in writing by April 9, 2026, a virtual public hearing will be held on April 23, 2026, starting at 6:00 p.m. EDT, with information on how to attend posted on the AQD’s webpage at Michigan.gov/EGLEAirPublicNotice. If requested, the virtual public hearing may be preceded by an informational session.

Individuals without internet access and who are interested in receiving printed copies of the documents related to the draft Addendum should contact Kaitlyn DeVries at 517-599-1938 or DevriesK1@Michigan.gov.

This public notice is given in accordance with federal regulations for the SIP.

Public Comment Period for the Draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard and Revision to Michigan's State Implementation Plan and Ozone Maintenance Plan for Southeast Michigan Ozone Nonattainment Area

EGLE opened a public comment period for a draft Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard and Revision to Michigan's State Implementation Plan and Ozone Maintenance Plan for Southeast Michigan Ozone Nonattainment Area ("Draft Addendum") on March 23, 2026, which will remain open until 11:59 p.m. EDT on April 22, 2026. The purpose of the public comment period and virtual public hearing is to allow all interested parties an opportunity to comment on the Draft Addendum.

A public hearing was requested. A virtual informational session and public hearing will be held on April 22, 2026, starting at 6:00 pm. You may pre-register to the hearing or join the day of the hearing using this link https://bit.ly/AQD042226. Alternatively, you may call into the meeting by calling 855-758-1310 and using the webinar ID: 847 4896 8640.

Draft Addendum:

- Addendum to the Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard and Revision to Michigan's State Implementation Plan and Ozone Maintenance Plan for Southeast Michigan Ozone Nonattainment Area

In the draft Addendum, the AQD is seeking public comment on Michigan's Addendum to the January 2022 Request for Redesignation to Attainment for the 2015 Ozone National Ambient Air Quality Standard and Revision to Michigan's State Implementation Plan and Ozone Maintenance Plan for the Southeast Michigan Ozone Nonattainment Area. The Request for Redesignation was submitted to the United States Environmental Protection Agency (USEPA) on January 3, 2022. The USEPA acted on the Request for Redesignation on May 19, 2023. However, based on events that have occurred since that time, EGLE requests the USEPA reconsider the Request for Redesignation for the southeast Michigan nonattainment area.

The public is encouraged to review the proposed documents which can be found posted on our EGLE – State Implementation Plan (SIP) and Attainment page under *SIP Proposed Documents and Final Submittals* and present comments through the end of the public comment period. All statements received during the public comment period will be considered by the AQD. After consideration, EGLE may submit the SIP to the USEPA as written, submit it with minor revisions, or make major changes that will require a repeat of the public comment period.

Submitting Comments:

There are several ways to submit comments on the proposed SIP revisions.



Email your comment to ShuffE@Michigan.gov. Please include "Comments on SIP Revision" in the subject line.



Mail your comment to Erica Shuff, EGLE, Air Quality Division, SIP Development Unit, P.O. Box 30260, Lansing, Michigan 48909-7760.



At the virtual public hearing.

Individuals without internet access and who are interested in receiving printed copies of the documents related to the draft Addendum or who need accommodations or other assistance to effectively participate in the hearing (if requested) should contact Kaitlyn DeVries at 517-599-1938 or DevriesK1@Michigan.gov.

This public notice is given in accordance with federal regulations for the SIP.

EGLE promotes the equitable treatment and meaningful involvement of Michigan's residents regarding the development, implementation, and enforcement of laws, regulations, and policies. Equitable treatment means that no group of people bears a disproportionate share of the negative consequences resulting from governmental, industrial, or commercial operations and policies. Meaningful involvement means all people have an opportunity to participate in decisions that affect their environment and/or health.

EGLE does not discriminate on the basis of race, sex, religion, age, national origin, color, marital status, disability, political beliefs, height, weight, genetic information, or sexual orientation in the administration of any of its programs or activities, and prohibits intimidation and retaliation, as required by applicable laws and regulations.