

**Midwest Generation, LLC
Waukegan Generating Station
East and West Ash Ponds Proposed Closure Construction Project
Public Meeting General Summary**

INTRODUCTION

In accordance with Title 35 of the Illinois Administrative Code (“35 IAC”) Section 845.240, Midwest Generation, LLC (MWG) posted the public meeting notice on the Closure Plans for Waukegan Generating Station’s East and West Ash Ponds on its publicly available website and provided a copy of such notice to the Illinois Environmental Protection Agency (Illinois EPA or Agency) to email to its listserv for this facility. The bilingual public meeting notice was mailed to all residents within at least 1 mile of the facility on November 8, 2021, which totaled 5,494 residential mailing addresses. The notice was also posted in 33 public locations within 10 miles of the facility boundary.

The public meetings for Waukegan Generating Station’s East and West Ash Ponds were held on December 15, 2021 from 6:00 p.m. to 8:00 p.m. and on December 16, 2021 from 10:00 a.m. to 12:00 p.m. The meetings were held virtually, and participants were invited to attend via Zoom or telephone. Sixty members of the public attended the December 15th meeting, and forty-six members of the public attended the December 16th meeting (the remaining attendees were MWG affiliate employees and consultants). At least nineteen members of the public attended both meetings. Attendees who wished to sign up for a copy of the meeting summary and/or be added to Illinois EPA’s listserv for the facility were asked to sign up via a link to a Google form that was provided within the chat function of the Zoom meeting and posted on MWG’s website, midwestgenerationllc.com. Forty attendees requested a copy of the meeting summary, thirty-seven of whom requested transmittal of their email address to the Agency to be added to the Agency’s listserv for the facility. It was announced that the link would be available on MWG’s public website for two weeks. After an introduction and approximate 30-minute presentation on the proposed closure construction plan, the public was given approximately 1 hour and 15 minutes during each meeting to ask questions and provide comments.

This document serves as a summary of the issues and questions raised during the meeting.

MWG proposes to close the East Ash Pond in place by installing an alternate final cover system (ClosureTurf®) and close the West Ash Pond by removing and disposing of the remaining material, decontaminating the geomembrane liner, and repurposing the pond to manage station stormwater.

SUMMARY OF ISSUES AND QUESTIONS RAISED DURING THE MEETING

Closure Method

Several attendees questioned why both ponds were not going to be closed by removal. MWG is proposing to close only the West Ash Pond in that manner so that the area can be reused to continue managing stormwater in accordance with the facility’s National Pollutant Discharge Elimination System permit. Prior to the decision to permanently retire the two coal-fired electric generating units at Waukegan (Units 7 and 8) by June 2022, MWG planned to replace the East and West Ash Ponds with a remote submerged scraper

conveyor (SSC) as the means of managing the Station's coal ash. A remote SSC is a mechanical system that uses a large trough and conveyor to dewater ash, and MWG planned to install this system in the northeast corner of West Ash Pond where the existing ash sluice piping and recycle water piping are located and thus could have been readily integrated into the new system. This new remote SSC would have also provided a means of segregating bottom ash transport water from the other wastestreams managed in the ash ponds to facilitate compliance with the U.S. EPA's recently revised Effluent Limitation Guidelines (ELGs) for steam electric power plants.

In June 2020, MWG took the West Ash Pond out of service. At that time, the U.S. EPA had yet to finalize its proposed amendments to the alternative closure requirements in its CCR Rule (40 CFR Part 257 Subpart D); the Proposed Rule was published in December 2019. These amendments, which were finalized in late August 2020, require MWG to obtain alternative disposal capacity for all CCR and non-CCR wastestreams being managed in the East Ash Pond as soon as technically feasible. In order to install the new remote SSC in the West Ash Pond, MWG had to first close the West Ash Pond by removing the ash stored in pond so the area could be repurposed. Thus, in the summer of 2020, MWG began dewatering and removing the ash in the West Ash Pond in accordance with historical cleaning practices to ensure the new remote SSC could be installed as soon as technically feasible.

At the time the decision was made to permanently retire the coal-fired electric generating units at Waukegan (June 2021), only approximately 7,000 cubic yards of CCR remained in the West Ash Pond, compared to 70,000 cubic yards of CCR that was estimated to be in the East Ash Pond in 2021. Because the Station will need a pond to continue managing the site's stormwater, MWG opted to repurpose the West Ash Pond to manage non-CCR wastewater (as it has throughout its operating life, in addition to managing CCR wastewater) by removing the remaining 7,000 cubic yards of ash remaining in the pond, removing the pond's sand-and-limestone warning layer (which was in contact with CCR wastewater), and decontaminating the pond's HDPE geomembrane liner to be reused for stormwater management.

Because the Illinois CCR Rule requires the complete removal of a pond's liner and ancillary equipment / structures when closing an ash pond by removal, MWG requested an Adjusted Standard from the Illinois Pollution Control Board in May 2021 and amended the petition in September 2021 to reuse the West Ash Pond's existing HDPE geomembrane liner. Not only does MWG believe that the West Ash Pond's existing HDPE geomembrane liner and ancillary equipment / structures can be decontaminated and reused but reusing the West Ash Pond as a stormwater pond in this manner would prevent wasting a competent geosynthetic liner and would prevent the need to construct a new stormwater pond at the site. As such, this would ensure MWG develops alternative disposal capacity for the non-CCR wastestreams currently being managed in the East Ash Pond as soon as technically feasible as required by the U.S. EPA CCR Rule.

In summary, given the site-specific conditions and regulatory requirements, removing the small amount of ash remaining in the West Ash Pond and repurposing the pond as a stormwater pond is the best closure scenario for providing both short- and long-term protection to groundwater and surface water resources along with ensuring overall protection to public health, welfare, and safety. Meanwhile, given the amount of ash that would need to be removed from the East Ash Pond, closing the East Ash Pond in-place is the best closure scenario for providing both short- and long-term protection to groundwater and surface water resources along with ensuring overall protection to public health, welfare, and safety.

Finally, the closure alternatives analysis presented one closure by removal scenario and three methods of closure in place for the East Ash Pond, the chief difference between the three methods being the amount of fill required for final grading: minimum, intermediate, and maximum. There is no difference in the groundwater modeling results for the closure in place or closure by removal alternatives, so all are equally

protective of groundwater. To limit offsite hauling, the closure in place option for the East Ash Pond is the preferred solution. For the closure in place options which were analyzed, the minimum and maximum amounts of fill are more prohibitive of potential future use. The minimum grading scenario creates a cap that will be above the perimeter berms (a hill) on the east side of the pond and grading down to a low point below the perimeter berms adjacent to the intake structure. The maximum grading will create a hill with steeper side slopes which will limit future reuse as compared to the intermediate grading scenario. The source of fill to achieve final closure grades is an onsite stockpile of sand dredged from the Waukegan Station intake canal which does not contain ash. MWG is proposing the intermediate fill and grading scheme that provides the best grading for future use of the area and are protective of groundwater.

Existing Geomembrane Liners

There were questions raised about the current liners in the East and West Ash Ponds. The East and West Ash Ponds are currently lined with 60-mil (60 thousandths of an inch) high-density polyethylene (HDPE) geomembrane liners that were installed in 2003 (East Ash Pond) and 2004 (West Ash Pond). While HDPE geomembrane is a proven liner material for preventing the infiltration of wastewater into groundwater and for preventing the infiltration of stormwater into capped waste, the East and West Ash Pond liners do not meet federal or state CCR regulations because the rules require a composite liner system with at least 2 feet of clay underneath the geomembrane liners. The purpose of the 2-foot-thick clay liner is to serve as a backup in case the overlying geomembrane liner leaks. However, groundwater monitoring at the site indicates that the existing liners are intact and are not leaking. Finally, geomembrane caps have been pre-approved by the Illinois EPA as a final cover system component for CCR surface impoundments and have been approved for final cover systems installed over hazardous waste (CCR is a non-hazardous waste).

Groundwater

Several attendees questioned the groundwater monitoring well (MW) network, the construction and location of the wells, and groundwater monitoring results. The monitoring well network consists of 3 upgradient (i.e., background) wells and five downgradient wells. Well boring logs from upgradient well MW-14 shows that it is not completed in ash. Upgradient well MW-11 has some slag, and upgradient well MW-9 has some ash and slag. The background wells were established to understand the quality of groundwater entering the site and before any interaction with the East or West Ash Ponds. MWG has been using the current network to specifically monitor for releases of coal ash constituents from the East and West Ash Ponds since 2015 under the federal CCR rules; the groundwater monitoring well network was installed and approved by the Illinois EPA in 2010. The current network complies with the Federal CCR Rule which requires at least one well upgradient and at least three wells downgradient of the ponds. Based on the consistency of the data from the downgradient monitoring wells indicating little spatial variability in the results, the network is sufficient to monitor groundwater interacting with the East and West Ash Ponds. MWG submitted the groundwater monitoring network to the Illinois EPA for approval as part of its Illinois CCR Rule operating permit application on November 1, 2021.

The most recently completed groundwater monitoring results, second and third quarter 2021, show that all of the 22 constituents monitored at all five downgradient monitoring wells are at or below the proposed groundwater protection standards (GWPS). The proposed GWPS were submitted to Illinois EPA for review and approval as part of the Application for Initial Operating Permit. An alternate source demonstration completed under the federal CCR rules showed that the two CCR surface impoundments are not a source of the constituents in the groundwater. There are elevated concentrations of constituents in the upgradient wells, reflecting the groundwater quality of groundwater entering the site. The property directly to the west

of Waukegan Station is in the Illinois EPA Site Remediation Program (“SRP”) due to historic contamination from its operations as a tannery. The property has an Environmental Land Use Control (ELUC), i.e., a deed restriction that limits potable water usage, that extends onto Waukegan Station property. The contaminant of concern for former tannery operations is arsenic, but other constituents, including boron, are detected in elevated concentrations at the western property boundary.

Questions were also asked about the Illinois Pollution Control Board’s interim finding in the case PCB-13-15. While this matter is still under litigation and is not about the IL CCR rules, MWG has been actively addressing impacts for several years. Additionally, MWG has been doing the work required under both the federal and Illinois CCR rules, including confirming the structural integrity of the impoundments, monitoring the groundwater, and preparing plans for closure. The Board will determine whether there is any additional work required, but MWG believes many issues will be addressed by compliance with the Illinois CCR rules.

Groundwater Modeling

Multiple attendees questioned or commented upon the groundwater modeling. The model allows for a mathematical representation of the groundwater flow system. Actual groundwater level data collected from site monitoring wells over many years were used within the model to replicate the flow conditions within the aquifer that currently exist. Once the computer model can sufficiently replicate actual existing field conditions, various proposed engineering scenarios being considered and developed can then be overlain in the model to assess future short- and long-term effects of a proposed engineering option on changes in groundwater quality and flow conditions.

The purpose of groundwater modeling for the proposed construction permit application was to provide feedback to the engineering team to show the effectiveness of each closure scenario. Since the existing groundwater data do not indicate that the ponds are leaking, a “hypothetical release” was modeled for the ponds. This allowed for subsequent evaluation and comparison of the engineering alternatives relative to their effect on improvement of water quality relative to the hypothetical release. The modeling was done for the overall concepts – closure by removal of ash from both the East and West Ash Ponds, closure by removal of ash from the East Ash Pond and closure in place of the West Ash Pond, closure in place of both the East and West Ash Ponds, and closure in place of the East Ash Pond and closure by removal and repurposing of the West Ash Pond. The results show that all four scenarios are equally protective of groundwater and that no impacts would be detected in any scenario after approximately twenty-five years. This is because under each scenario, the source of the hypothetical impacts is removed or isolated from the underlying groundwater. In the closure by removal scenario the ash is directly removed from the impoundments. In the closure in-place scenarios, the liner is in place, the ash is dewatered, and an impermeable cap is placed over the CCR precluding any precipitation infiltration through the CCR materials, thereby eliminating any connection of the hypothetical source materials with the underlying groundwater. Additionally, it is predicted that no impacts would be measurable in Lake Michigan.

The full groundwater modeling report will be included with the construction permit application that will be submitted to Illinois EPA by February 1, 2022. The permit application will be posted to MWG’s website within 14 days of submittal to the Illinois EPA.

ClosureTurf®

Questions were raised about the alternate final cover system, ClosureTurf®. ClosureTurf® is an engineered cap system designed by Watershed Geo that consists of a structured geomembrane under a synthetic turf with a sand infill. Over 2,500 acres of ClosureTurf® have been installed at more than 80 locations in more than 25 states, including the 45-acre Fly Ash and Bottom Ash Ponds at Ameren Energy's Meredosia Power Station in Meredosia, Illinois, which were closed in 2018.

Installation of proposed ClosureTurf® final cover system for the East Ash Pond is expected to require approximately 260,000 cubic yards of structural fill, 70,000 square yards of structured HDPE geomembrane cover, and 1,100 cubic yards of sand infill (for the artificial turf). Based on ongoing research, the structured geomembrane and artificial turf components of the proposed ClosureTurf® cap are expected to last over 400 years and over 100 years, respectively. The products used to manufacture these materials are also free of per- and polyfluoroalkyl substances (PFAS). The artificial turf component has also been tested at hurricane-level wind speeds and at storm rainfall intensities of over 6 inches per hour (more intense than the 500-year, 1-hour storm for Lake County, Illinois). The most significant rainfall event to date at a site with a ClosureTurf® cap occurred in 2014 in Pensacola, Florida, where 22 inches of rain fell over 24 hours (twice the intensity of the 500-year, 24-hour storm for Lake County, Illinois); no damage occurred to ClosureTurf® cap.

A question was raised about whether the ClosureTurf® cap can support natural vegetation. The artificial turf component of the ClosureTurf® cap will not support natural vegetation. However, one of the reasons why ClosureTurf® was selected for the East Ash Pond's final cover system is because the system's artificial turf component provides superior protection against wind and stormwater erosion compared to topsoil and native vegetation. The ClosureTurf® system requires no long-term maintenance such as reseeding, mowing or irrigation to maintain its erosion resistance. A common failure mechanism in vegetated final cover systems is failure of the plants to thrive and provide a "dense" enough cover to prevent erosion of the earthen cap. This engineered system resolves this issue. Periodic inspections and maintenance will be completed on the cap system as part of the post-closure care program.

A question was raised about the impacts of ClosureTurf® to local wildlife. The sand infill placed on the artificial turf will only be approximately ½ to ¾ of an inch thick, so the risk of burrowing animals being trapped or killed is minimal. Evidence of animals trying to burrow into the final cover system will be monitored during the routine inspections conducted as a part of the East Ash Pond's post-closure care program to ensure that the integrity of the ClosureTurf® system is not compromised by such activities.

A question was raised about the predictive leakage rate of ClosureTurf®. The estimated liquid flow rate through the structured geomembrane component of the proposed final cover system for the East Ash Pond is estimated to be 6.83×10^{-10} m³/sec/m². Please refer to Section 3.2 of the Preliminary Written Closure Plan for the East Ash Pond on MWG's Illinois CCR Rule compliance website for additional details on how the estimated liquid flow rate through the structured geomembrane component of the ClosureTurf® cap was calculated. It is important to note that this estimated liquid flow rate is based on the following assumptions: (1) a 2-mm-diameter hole is present for every acre of liner, and (2) 4.37 inches of rainwater is present on the liner. The first assumption is based on research indicating that geomembrane liners with robust construction quality assurance programs are not expected to have more than one unaddressed defect per acre. The second assumption is based on the 25-year, 24-hour precipitation depth for Lake County, Illinois

and is a conservative assumption because the final cover system is designed to preclude the accumulation of stormwater on the structured geomembrane.

It is also important to compare the estimated liquid flow rate through the structured geomembrane component of the proposed ClosureTurf® cap to the standard low-permeability layer prescribed by the Illinois CCR Rule, which is a 3-foot-thick soil layer with a hydraulic conductivity no greater than 1×10^{-7} cm/sec. The estimated liquid flow rate through this “standard” cap with 4.37 inches of stormwater above the cap is about 1.12×10^{-9} m³/sec/m². Therefore, the stormwater infiltration rate Illinois CCR Rule’s standard low-permeability layer is expected to be 60% greater than the estimated infiltration rate through an unaddressed defect in the structured geomembrane component of the proposed ClosureTurf® cap.

Shoreline Erosion

Several attendees asked questions about shoreline erosion and how the East Ash Pond’s final cover system may be impacted by loss of land between it and Lake Michigan. One attendee referenced a study that estimated Illinois Beach State Park has lost 27 to 62 feet of shoreline between 2010 and 2012. The referenced study appears to be quoted from an article published in the *Chicago Tribune* on May 30, 2017, titled “Lake Michigan Shoreline Erosion Could be Getting Worse, Research Shows.” Per this article, the referenced rate of shoreline erosion occurred at the North Unit of Illinois Beach State Park. The article also states that the shoreline at the northern portion of Illinois Beach State Park “is arguably the hardest hit piece of coastline in the state” and “has retreated more than 600 feet between 1939 and 2014.” However, the article also states that, farther south, the breakwater at Waukegan Harbor “has trapped enough sand to push the suburb’s waterfront 860 feet into the lake, growing at a rate of 11 feet each year.”

The Waukegan Generating Station is approximately 1.5 miles north of Waukegan Harbor, compared to over 4.5 miles away from the Illinois Beach State Park’s North Unit, which is north of the former nuclear power plant in Zion, Illinois. Accordingly, the conditions at the Waukegan Generating Station are similar to those at Waukegan Harbor discussed in the *Chicago Tribune* article, as evidenced by the regular dredging of sand that accumulates in the Station’s Intake Channel. Sand dredged by the Station is stockpiled onsite, which can be seen on Google Earth photographs.

A September 2020 study conducted by the Illinois Department of Natural Resources (IDNR) Coastal Management Program (CMP) and the Illinois State Geological Survey (ISGS) through the Prairie Research Institute¹ states that the shoreline along the Illinois Beach State Park’s North Unit has retreated by as much as 820 feet between 1939 and 2017. Conversely, the study concluded that the shoreline along Illinois Beach State Park’s South Unit has advanced lakeward by as much as 1,100 feet during the same time period. Per the U.S. Army Corps of Engineers (USACE), Chicago District’s environmental assessment published in September 2019 for the ongoing Waukegan Harbor Dredging project², the shoreline gain along the southern part of Illinois Beach State Park is occurring at a rate “at or near what likely occurred in the natural setting.”

The following figure, which was obtained from the referenced 2020 study conducted by the IDNR CMP and ISGS, provides a graphical representation of shoreline loss and gain between 1939 and 2017 from Waukegan Harbor to Winthrop Harbor. Per the study, areas of land loss are represented by warm colors, with the darkest warm-color shading representing areas with the largest land loss. Meanwhile, areas of land gain are represented by cool colors, with the darkest cool-color shading representing areas with the largest

¹ <https://univofillinois.maps.arcgis.com/apps/MapSeries/index.html?appid=d77327796e4a425d9c1f4d12be53bd9f>

² <https://www.lrc.usace.army.mil/Missions/Civil-Works-Projects/Waukegan-Harbor-Dredging/>

land gain. As shown on this figure, the Waukegan Generating Station is located within a portion of the 2020 study area that has seen some of the most land gain between 1939 and 2017.



Figure Obtained from "Illinois Beach State Park: A Dynamic Shoreline" (September 11, 2020).

Per the following aerial image from Google Earth (taken in late May 2021), the East Ash Pond is approximately 690 to 850 feet west of Lake Michigan's apparent shoreline. Based on the 2017 *Chicago Tribune* article, the 2019 USACE environmental assessment for the Waukegan Harbor Dredging project, and the 2020 IDNR CMP and ISGS study, this portion of Lake Michigan's shoreline is more likely to gain land than to lose land via erosion. However, as part of MWG's regular inspections of the East Ash Pond's

final cover system during its post-closure care program, MWG will monitor the Lake Michigan shoreline east of the East Ash Pond to determine whether any shoreline losses are occurring and, if so, whether those losses would have a negative impact on the East Ash Pond's final cover system. If negative impacts are anticipated, appropriate remediation measures will be taken.



Other Closure Concerns

Questions were raised about using rail and barge to transport ash and the rail and conveyor system located at Waukegan Station. Transportation by rail and barge are not common methods of managing coal ash and would require the design and construction of new infrastructure at Waukegan Station and potentially, at the receiving facility. The current rail unloading system was designed to transfer coal in one direction, from a railcar to the generating station. It was not designed to transfer CCR (a different material than coal) nor to move material from the station to railcars. To use the rail system at Waukegan Station for transport of CCR, new loading and unloading equipment, as well as a new conveyor system, would need to be installed, requiring extensive environmental permitting. Necessary permits include NPDES, stormwater, and air construction permits. A barge loading system is not currently present at Waukegan Station, so like the rail system, a new system would need to be installed and would also require extensive environmental

permitting, such as NPDES, stormwater, air construction permits, and permits from the Illinois Department of Natural Resources and the Army Corp of Engineers.

Questions were raised about the beneficial use of ash remaining in the East Ash Pond. The process of evaluating the market for beneficial use of ash is done by MWG's commercial marketing team and MWG routinely evaluates the market for sources that would accept ash for beneficial use. Currently, there is not an identified end user for beneficial reuse of the ash in the East Ash Pond, and the material remaining in the West Ash Pond is not suitable for beneficial reuse. Regardless, the groundwater modeling results for closure by removal are the same as for closure in-place.

Questions were raised about whether the City of Waukegan was consulted in developing closure plans prior to presentation of the plan in the public meetings. MWG was scheduled to meet with the City of Waukegan in late September to discuss the closure of the ash ponds as well as items related to the redevelopment of the property. The City of Waukegan canceled the meeting. MWG remains willing to meet with the City of Waukegan to discuss closure plans and the redevelopment of the property.

Financial Assurance

Questions were asked about what financial systems are in place to ensure long-term monitoring is completed after closure. Owners of CCR surface impoundments are required to provide financial assurance to ensure the completion of closure, completion of post-closure care when applicable, and remediation of releases from CCR surface impoundments. MWG has provided such financial assurance in the form of performance bonds to Illinois EPA.

Closure Costs

Questions were asked about closure costs. Costs for each closure method were estimated in the closure alternatives analysis (CAA). For the West Ash Pond, the estimated cost difference between closure by removal and closure in place is 1% -- \$16,190,074 for closure by removal and \$16,425,940 for closure in place. For the East Ash Pond, the proposed closure method (in place with intermediate grading and an engineered turf cap) is estimated to be 20% more expensive than closure by removal in the CAA -- \$16,209,015 for closure by removal and \$19,497,113 for closure in place. MWG did not use cost as a determinative factor in selecting the closure methods – there is essentially no difference in the estimated costs of closing by removal and in place for the West Ash Pond and closing the East Ash Pond in place is estimated to be more expensive than closure by removal.

Drinking Water

Several questions were asked about the proximity of the CCR surface impoundments to Lake Michigan and potential impacts to the City of Waukegan's drinking water. MWG's analysis of the groundwater on the eastern edge of its property shows that there is little risk to Lake Michigan by the CCR surface impoundments, because the concentrations are below the Lake Michigan surface water standards. The design of each closure alternative is structurally stable, eliminating the risk of a breach into the Lake. Additionally, the City of Waukegan's 2021 Annual Water Quality Report states that its system and drinking water "had no violation of a contaminant level." The City further states that "since the water supply's intake is 6,200 ft into the lake there is low susceptibility to shoreline contaminants due to mixing and dilution." The full report, and prior year's reports, can be found here: <https://www.waukeganil.gov/555/Reports>.

Future Use

Several members of the public commented upon or questioned the future use of Waukegan Station, including converting Units 7 and 8 to gas-fired electric generating units and making the space accessible for public access. MWG is currently planning full retirement of Units 7 and 8 since market conditions and state law do not support conversion of Units 7 and 8 to natural gas fired units. In the near term, Waukegan Station will continue to operate as a power plant; the Station operates two ultra-low sulfur diesel fired peaking units. That said, MWG has taken initial steps to consider the potential for sustainable redevelopment related to solar and battery storage. The passage of the “Coal-to-Solar” program by the Illinois legislature under the Energy Transition Act in September 2021 is a positive outcome in support of pursuing a meaningful battery storage project at Waukegan and has the potential to jumpstart the beneficial reuse of this site. MWG is currently not able to suggest or predict other potential future uses for the facility.

SUMMARY OF REVISIONS, CHANGES, AND CONSIDERATIONS

Public engagement is an important part of the permitting process. Midwest Generation valued the opportunity to hear and consider the comments of individual community members and others who participated in the public meetings. We are proceeding with our proposal for closing the East Ash Pond in place by installing an alternate final cover system (ClosureTurf®) and close the West Ash Pond by removing and disposing of the remaining CCR, decontaminating the geomembrane liner, and repurposing the pond to treat station stormwaters as presented at the public meetings. Taking public comments into consideration, and with additional deliberations after the public meetings, our full analysis continues to indicate that our proposed plan – which remains subject to regulatory review and approval – prioritizes the environment and community well-being.