



GREAT LAKES COALITION
Michigan/Lake Michigan Chapter
For Shoreline Preservation

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November 15, 2012

Cook Energy Center
One Cook Place
P.O. Box 850
Bridgman, MI 49106

Attention: Bill Schalk, Community Relations
John Ellegood, Chief Inspector, Nuclear Regulatory Commission

Gentlemen:

The Michigan/Lake Michigan Chapter of the Great Lakes Coalition is a public interest group of shoreline property owners just like American Electric Power.

Since we have no public information to the contrary, we conclude that Hurricane Sandy, thankfully, did not blow your shore protection even though your sheet piling seawall tops out at 585 feet above sea level. This is based on your permit of 1970 issued by the U.S. Army Corps of Engineers. Your 2011 brochure *Safe Strong Secure Prepared: Your Safety Is Our Number-One Priority* states "The Cook Plant is protected from flooding to a level of 11 feet above the highest-ever recorded lake level." The highest recorded lake level is 582 feet. Our best available information is that: Data Buoy #45007 recorded wave heights of 22+ feet. Adding 11 feet above that gives 593 feet.

The lake level on October 30, 2012 when Sandy struck was about 576.5 feet. 22-foot waves put that water at about 598.5 feet, which is overtopping your wall by 13.5 feet. If the lake was up 10 feet, you would be swamped by almost 25 feet (6'5" normal range + 2-foot set-up + 20" Georgian Bay restoration proposal).

The 1997 U.S. Army Corps of Engineers Waterways Experiment Station studies of the St. Joseph, Michigan shore showed that over 800,000 cubic yards of sand per year are being trapped or diverted from the natural alongshore transportation system by the piers at the St. Joseph River mouth. In addition, recent dredging from that river upstream of the mouth indicates that despite the prolonged 14-year drought and river slow flow, the St. Joseph produced over 200,000 cubic yards per year of clean, beach quality sand. This combines with the trapping and diverting for a potential 1,000,000 cubic yards (27,000,000 cubic feet) of sand lost offshore beyond the depth of closure (+/- 20 feet) each year.

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You may have visible, so-called subaerial, sand which helps protect from floods. But that sand you can see is extremely ephemeral and may be largely gone – especially after Sandy’s blow from the north.

We are asking that you please sit down with us and explain how we are wrong.

Sincerely,

Larry J. Robson, M.D.
President
Michigan/Lake Michigan Chapter for Shoreline Preservation
Great Lakes Coalition

Enclosures: 1997 WES Report on Effectiveness of Beach Nourishment, pages 17 & 18
NOAA Data Buoy #45007 Wave Heights – 22 feet
7/31/01 Testimony of Guy Meadows, Ph.D.

Copy with enclosures to:
Lana Pollack, International Joint Commission
Swetha Shah, Nuclear Regulatory Commission, Region 3
Scott Aiken, The Herald Palladium
Paul Sax, U.S. Army Corps of Engineers, Detroit District