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Dear Jon Simonsen,

Thank you for the opportunity to comment on the Draft Strategic Analysis of Wild Rice Management in Wisconsin. The League of Women Voters of Ashland and Bayfield Counties (LWV/ABC) has a long history of interest and involvement in natural resource issues. Among our members are those who gather, process, and consume wild rice.

We appreciate the inclusion of topics such as mining and climate change in the draft Strategic Analysis, as well as the general overall depth and breadth of topics. Lacking, however, is any mention of fossil fuel infrastructure. We recommend the DNR add fossil fuel infrastructure to the Strategic Analysis as a specific industrial threat to wild rice management based on our support of the Treaties with Indigenous citizens, and the concerns outlined below.

Fossil Fuel Pipelines are extensive across Wisconsin, with many crossing wetlands and waterways where wild rice grows. Current pipelines and any further expansion threaten intact ecosystems on which wild rice depends. These threats are defined at 3 levels.

From preconstruction work through retirement and abandonment, pipelines pose decades of opportunity for ecological damage. Wisconsin has already seen the results of violations in operations of fossil fuel pipelines. Several of the most recent events include:

- Enbridge Line 5's operations through the Bad River Reservation (expired contracts) have resulted in findings of an unsupported exposed pipeline in an eroded area resulting from extreme weather events. These increasingly frequent storm events have also narrowed the meander on the Bad River where the pipeline crosses the river and threatens damage to Line 5 in the next extreme weather event.
- Enbridge Line 13 spill and delay in reporting of 1200 gallons of highly toxic diluent near Fort Atkinson.

- Enbridge (2009) was fined \$1.1 million for 115 waterway/wetlands environmental violations across 14 counties on their pipeline from Superior through central Wisconsin to their refinery in Illinois.

The direct correlation of fossil fuels with climate change is an even greater threat. The U.S. EPA website cites research indicating that oil-based transportation contributes to 28% of the anthropogenic U.S. greenhouse gas emissions.

A legitimate concern is the capacity of the fossil fuel industry's financial ability to adequately monitor, maintain, and retire pipelines in the future. In the case of a spill, the industry's ability pay for clean-up, rehabilitation, and compensation is also questionable. As climate change threats receive more global attention, the economic market is shifting. Globally, banks are being pressured to divest and defund fossil fuel infrastructure, and the fossil fuel industry is being pushed toward a new business model based on a rapid move to sustainable energy sources. In response, the industry has begun divesting of fossil fuel assets and investing in sustainable energy.

The LWV/ABC urges the DNR to work in collaboration with the Great Lakes Indian Fish and Wildlife Commission in the overall management of the wild rice resource. Additionally, we would like to see the threat posed by fossil fuel infrastructure included in the Strategic Analysis. We support the ongoing work of the DNR in applying science to the Strategic Analysis. Further, we encourage DNR's efforts to render expert advice to the Administrative, Legislative and Judicial branches of our Wisconsin Government in pursuit of policies that support the full intent of the Public Trust Doctrine and protect the rich and diverse ecosystems of Wisconsin.

Respectfully submitted,



Sue Niemi

President

League of Women Voters of Ashland and Bayfield Counties