September 1st, 2023

 The Rural Utility Service (RUS) should refuse to finance the Nemadji Trail Energy Center (NTEC) and reject the application of Dairyland Power, Minnesota Power (Allete), and Basin Electric (the owners). The project risks serious harm to the health, safety, economy, and cultural heritage of the city of Superior while increasing utility rates for our citizens. It is not necessary to meet the energy demands of a society that is rapidly converting to renewable energy. Because I firmly believe that this project cannot benefit, and will most likely harm, the interests of the people of Superior, I will direct my administration to resist the construction and operation of the project using the full powers available to us under the law and I intend to ask the Superior City Council to support and join these efforts.

 NTEC will release harmful pollutants into Superior’s East End neighborhood and along the Nemadji river, a heavily used waterway providing recreation to citizens and visitors year round. While these toxic emissions are regulated by the Wisconsin Department of Natural Resources, who permit only limited amounts of airborne pollutants, NTEC will likely release nearly the maximum amount of pollution allowed under the law. While the DNR and the owners may find this acceptable, the people of Superior do not. This neighborhood already suffers from increased pollution from heavy auto and truck traffic generated by the highway less than a mile from the recommended site of NTEC as well as from rail traffic throughout the neighborhood and city. In recent summers, Canadian wildfire smoke has dangerously eroded air quality for the entire city. These pollutants are not regulated by any state or federal agency and are not considered by the DNR when it permits pollution from industrial sources such as gas plants. Further degradation of the air quality from a major industrial polluter presents a very real threat to the health of this neighborhood and the city at large, especially for the children and senior citizens living just a few blocks away.

 Natural gas is not safe. It is a highly explosive chemical that threatens the safety of workers and neighbors. In 2010, the Kleen Energy natural gas power plant, similar in size to the proposed NTEC plant, exploded during construction, killing 6 and injuring over 50 people. Natural gas explosions kill and injure dozens of people annually. While accidents, injuries, and deaths may seem statistically low, this risk is not present with renewable energy. Superior is an industrial city hosting expansive rail yards, an oil refinery, and large petroleum storage and transmission. Our citizens already endure significant risks to their lives and their safety. The city has endured two large scale evacuations in the last 30 years due to industrial accidents, the most recent during the Husky refinery explosion in 2018. While this industry has defined our economy for most of the last century, we cannot expect our citizens to endure any further risk to their wellbeing.

 Most of the support for NTEC will argue that it will improve the economy of Superior. It will not. This project is a significant threat to Superior’s future growth and contributes no economic benefit to Superior or the surrounding area. While construction might provide some temporary economic benefits in the short term, the plant would raise utility rates on all residents and businesses for the foreseeable future. Those people and institutions that are already struggling to pay high energy bills would be forced to pay the full cost of a plant that provides them no benefit whatsoever. Due to the plant’s size, pollution, noise, light, and industrial aesthetic, it will be difficult or impossible to encourage development of housing or retail in the area, inhibiting our economic growth and permanently scarring a peaceful neighborhood.

 Other commenters will better describe the lack of need and very real environmental impact of NTEC. I strongly encourage RUS to take note of the changing landscape of renewable energy in the state of Wisconsin and across the United States. During their initial application and subsequent public promotion of NTEC, Dairyland Power frequently described the plant as essential to filling gaps in the electrical grid caused by dips in access to renewable energy. Their predictions for these gaps have consistently proven inaccurate. Several studies now show that Wisconsin and our neighboring states are capable of meeting 100% of our energy needs through renewables.

 Natural gas is not clean energy. While the burning of natural gas releases less potent greenhouse gasses than the burning of coal, gas plants consistently leak significant amounts of methane, a highly explosive greenhouse gas nearly ten times as potent as CO2. The RUS must recognize the significant public safety and environmental risk posed by these leaks, which are nearly always unreported and which NTEC fails to address in their application and responses. Furthermore, as the Environmental Protection Agency has pointed out in its comments to the RUS, the mining of natural gas through fracking releases significant amounts of greenhouse gasses into the atmosphere. The continued use of natural gas provides no significant benefit over coal.

 The several environmental assessments prepared by Dairyland Power and the RUS typically describe the preferred NTEC site as “industrial”. This is false. While several industrial sites exist beyond the proposed NTEC site, those sites are set well back from residential areas. The NTEC site lies within a residential neighborhood. Construction of the plant would be an unacceptable incursion of heavy industry into a quiet, riverfront neighborhood and would take place on a site zoned exclusively for residential development. Construction would require re-zoning the property and vacating a platted street. I intend to oppose both the rezoning and vacation as a member and Chair of the City’s Plan Commission. The project cannot proceed at the preferred site under current law and the city is very unlikely to change the law and allow the project to proceed.

 The environmental assessments fail to consider the environmental risks posed by the site itself. The plant will displace flood mitigating wetlands, which will exacerbate flood concerns on the Nemadji river. The Nemadji runs beneath a major highway half a mile downriver from the preferred NTEC site and has overflown its banks and flooded the highway at least twice in the last ten years. Further removal of wetlands in the river’s watershed can make these events more frequent and longer lasting.

 The most alarming and offensive omission in the environmental assessments so far has been the disregard for the cultural significance of the adjacent cemeteries along the Nemadji River. The Nemadji Cemetery, located less than 1/4 mile from the site, is Superior’s oldest cemetery and contains the remains of many of the city’s founders and earliest residents. The St. Francis Cemetery, which directly borders the NTEC site, is an active cemetery that hosts burials and funerals on a regular basis and almost daily comforts visiting mourners who tend the graves of their lost loved ones. Along the river, located at the edge of the St. Francis Cemetery, a mass grave holds the remains of many of the Lake Superior Ojibwe people. More than a century ago, the City of Superior exhumed the Ojibwe burial ground from nearby Wisconsin Point to make room for another large industrial project. Hoping to find a peaceful place to lay these remains, they selected a quiet site along the Nemadji River in the hopes they would not be disturbed again. Last summer, less than two months after RUS released their revised environmental assessment, the City of Superior formally returned this burial ground, as well as the original burial ground on Wisconsin Point, to the Fond du Lac Band of Lake Superior Ojibwe. In doing so, we promised to protect the peace and sanctity of that site. Permitting the construction of a large industrial plant a few feet away would break that promise.

 Superior is a developing and growing city. Over the last six years, we have invested millions of dollars into the improvement of our community. We have finally begun to shed our reliance on heavy industry as the sole driver of our economy. We deserve a safe, quiet, and beautiful city. The Nemadji Trail Energy Center will not improve the economy, environment, or even the energy grid in Northern Wisconsin. It brings real risk to the people of Superior and will degrade the quality of life of our residents. It asks the people of Superior and Northern Wisconsin and Minnesota to directly fund the profits of major utilities without any discernible benefit in exchange. I strongly oppose the construction of this plant and ask the Rural Utility Service to deny financing to this project.

Jim Paine

Mayor

City of Superior, Wisconsin