

Citizen Petition to the Wisconsin Natural Resources Board for the Wisconsin Department of  
Natural Resources to conduct a  
***Strategic Analysis of Frac Sand Mining in Wisconsin***

*What is a strategic analysis?*

It is a DNR study of complex and contentious natural resource issues or policies. Through the strategic analysis process, the DNR evaluates potential alternative approaches to its current regulation, identifies potentially affected natural resources and likely effects of various alternatives on those natural resources.

The purpose is to develop the best information to aid decision-makers in dealing with a controversial resource issue such as frac sand mining. The DNR won't create any new regulation through the strategic analysis process, but the information developed may lead the DNR to revise its regulations, permits, or policies, and could also be used by the legislature or local governments to create more effective and protective laws.

*Why should DNR conduct a strategic analysis of frac sand mining?*

The frac sand mining industry is growing at a frantic pace with citizens and our government struggling to keep up. Unlike the Minnesota legislature, our state government has not required in-depth study of this industry's impacts or the adequacy of current regulations. The DNR's past decisions to maintain the status quo have deferred to the lack of data or research regarding the scope of impacts from frac sand mining. The number and concentration of frac sand mines has greatly increased since the DNR last examined the frac sand industry. New developments in research, data collection, and regulation, as well as several documented instances of noncompliance and pollution by frac sand mines and processing facilities support the need for a strategic analysis now. Decisionmakers and Wisconsin citizens need a detailed study of the environmental and public health impacts of frac sand mining and alternative ways to manage this natural resource extraction industry.

*What role do citizens play?*

Citizens play a critical role. Wisconsin citizens are coming together to request this study of frac sand mining's impacts. The strategic analysis process allows for citizens to be involved, so comments from members of the public and their input on the scope of the study will be valuable and encouraged. We will need citizens to stand together and participate in meetings and opportunities for comment.



## *What are some of the potential impacts of frac sand mining in Wisconsin?*

### Air and Public Health Impacts

- Frac sand mines and processing facilities emit air pollutants such as fine particulate matter that may include crystalline silica dust. Fine particulate matter travels deep into the lungs and causes serious respiratory and cardiovascular problems and studies show that this dust causes cancer in mine workers. Particulate matter made of crystalline silica causes silicosis, a deadly and incurable lung disease.
- The DNR currently does not require facilities to monitor for the smallest and most dangerous particulate matter, including silica dust, and has refused to set more stringent limits.

### Water Impacts

- Frac sand mines and processing facilities pump and use large quantities of groundwater for mining and processing sand. This groundwater use can lower water levels in nearby wells and surface waters.
- These facilities also may cause surface water and groundwater pollution.
  - They use chemicals like polyacrylamide in the sand washing process.
  - Water from these sites also has clays and sediment that can affect water quality and aquatic life.
  - Recent stormwater pond sampling at several facilities indicates that there may be high levels of metals in water that is released either to surface water or groundwater.

### Threatened and Endangered Species Impacts

- As a high-impact, landscape-scale industry, frac sand mining can impact a variety of threatened and endangered species. The primary species of concern is the Karner blue butterfly. Its habitat overlaps a great deal with land used for frac sand mining. The majority of facilities are not participating in the state plan to prevent harm to this species.

### Wetland Impacts

- Wetlands are common throughout our water rich state and are critical to protect water quality, prevent flooding, and provide habitat for numerous species. Frac sand mines may fill in wetlands for construction or harm water quality in wetlands.

### Long-term Impacts – Limitations of Reclaiming Mine Sites

- It is unclear whether reclamation plans will result in sites that are suitable for other uses and that will not continue to pollute the environment.

### Tribal Impacts

- Tribal nations and its members have a long history with the land of western Wisconsin. As out-of-state frac sand mining companies are leveling bluffs and hills in close proximity to Tribal territory, the members and leaders of Tribal Nations have sovereign power to protect its land and people from exploitation

### Economic Impacts

- Frac sand mining brings questionable boom-and-bust economic benefits to communities and creates numerous negative economic impacts for the tourism industry.

### Quality of Life Impacts

- Frac sand mines and processing facilities dramatically affect life in rural areas. Constant noise, light, train and truck traffic, vibrations from blasting, dust and water pollution turn quiet rural communities into industrial areas.