

## Jordan Olsen

I am writing in concern about the MPCA's proposed changes to regulation of Minnesota waters used for the production of wild rice by adopting site specific standards (SSS) for acceptable levels of sulfate pollution to replace the statewide standard of 10 ppm sulfates. This proposal sets the dangerous precedent of explicitly allowing increased pollution that may negatively impact precious natural resources and it should therefore be opposed and rejected.

The proposal appears sound in its reasoning that the requirements for maintaining ecological health may be dependent on specific location and a variety of environmental factors. Thus, a uniform standard for acceptable sulfate levels across the state may be inadequate for addressing the needs to maintain health and productivity of streams, lakes, and wetlands based on regional variations in ecology. While the proposal goes to some lengths to apply standards by which to evaluate the impacts of sulfate contamination on the health and productivity of wild rice, it is clear that the highly complex nature of sulfate interactions with wild rice-bearing ecologies is, at best, difficult to qualify and may be speculative with opportunity for error. An assessment of the predicted impacts of a newly adopted SSS that increases allowable sulfate levels is a gamble that, if lost, will result in irreparable harm to the environment and the people who rely on wild rice for their livelihoods. Why should we take such a risk? Furthermore, the applications for new SSS designations that expand allowable pollutant levels will undoubtedly be brought forth by parties who's vested interest is in polluting more, rather than those who seek primarily to preserve the environment and maintain ecological health and viability. This interest necessarily means that applications will be biased towards construing the impacts of sulfate contamination as less significant or harmful to the health and productivity of wild rice in the sites under consideration.

At a time when the Clean Water Act is under national attack and has suffered major erosion by the ideological, anti-science rulings of the Supreme Court of the United States, it is more important than ever that the state of Minnesota stands strong as an example of leadership in environmental policy and the protection of our waters. Moreover, wild rice is a fragile natural resource that must be protected and carefully stewarded to be maintained. This is critical to ensuring the health of Native populations who rely on it as a food source, preserving and respecting Native culture, and to fulfilling the state's moral and legal obligation to uphold tribal sovereignty and treaty rights.

Please reject this proposal for the door it opens to harming precious wild rice resources and the bad environmental policy precedent it sets. More robust policy should be aimed at reducing pollutants that already exceed allowable levels rather than giving polluters a way out of legal responsibility for the damage they may be inflicting. We should be focusing our efforts on better enforcement of current standards and holding those accountable who choose to ignore them. Thank you for your time and consideration of this important issue.

Regards,  
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