

## Tracy Sides

MPCA must enforce Minnesota's wild rice sulfate standard of 10 parts per million (ppm) under the Clean Water Act and decisions of the Minnesota courts. MPCA has no discretion to continue to delay or deny enforcement. The 10 ppm sulfate standard is the "effects threshold" for wild rice impairment.

Both the Clean Water Act and Minnesota law prohibit degradation of water quality in Minnesota lakes, streams, and wetlands. MPCA must not allow polluters to degrade high quality, low-sulfate wild rice waters.

Protect low-sulfate waters. Many of Minnesota's most abundant wild rice stands in the Boundary Waters, the Lake Superior watershed, and north central Minnesota (including the Big Sandy Lake area) have far less than 10 ppm of sulfate. MPCA permitting should not allow sulfate in these wild rice waters to increase even if the degraded level of sulfate remains just below the standard.

Sulfate pollution increases toxic mercury contamination of fish due to release of mercury from sediments and increased mercury methylation. MPCA must consider the effects of lax sulfate standard enforcement on mercury and methylmercury.

MPCA lax enforcement of the wild rice sulfate standard and increased mercury contamination of fish will damage the developing brains of fetuses, infants, children, and people who rely on fish for subsistence, and will impair the exercise of tribal Treaty-reserved rights.

Need proof to consider "site-specific standard." The wild rice sulfate standard is not advisory. Any discharger asking for MPCA even to consider of a "site-specific standard" sulfate standard must prove that wild rice beneficial use will be protected long-term.

High iron does not protect wild rice. Peer-reviewed scientific evidence does not support allowing more sulfate when there is also a high level of iron in sediments. Adding sulfate to waterbodies with high levels of iron coats wild rice roots with iron sulfide and interferes with wild rice seed quality, production, and sustainability.