

Lori Erickson

Thank you for hearing my comments!

First and foremost, 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 period.

Further, 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. We need to keep our pristine or near pristine waters where we can!

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. This is unacceptable.

Adding iron to the areas is not a fix. Peer-reviewed scientific evidence does not support allowing more sulfate when there is also a high level of iron in sediments. Adding sulfate to water bodies with high levels of iron coats wild rice roots with iron sulfide and interferes with wild rice seed quality, production, and sustainability. MPCA's "equation" method to determine if wild rice production would be protected without the 10 ppm standard was debunked in contested case proceedings in 2018. The "site-specific standards" loophole should not be used to resurrect this scientifically unsupported theory.

I firmly believe that no "site-specific standard" for discharge of sulfate to wild rice should be approved by MPCA without tribal consultation and tribal consent and a formal and public rulemaking process.

Finally, unless and until a "site-specific standard" has been formally approved as required under state law and the Clean Water Act, the MPCA must apply the 10 ppm wild rice sulfate standard in setting and enforcing permit limits and in preparing TMDL studies and implementation plans to restore wild rice waters listed as impaired due to excessive sulfate. MPCA must neither delay or assume a less stringent standard will at some point be approved.

Enforce the 10 ppm standard now!

Thank you,
Lori Erickson