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As someone who eats wild rice on a consistent basis, I understand that degradation is prohibited. 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.

Also, there is a health threat of sulfate and mercury. 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.

MPCA's "equation" is not valid science. 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.

Talking about science, who came up with the high iron does 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.

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. No moving the "goalposts" when it comes to what we are putting into our bodies.

Thank you.