

# Anita Anderson

Hello-

I am not in support of the site-specific sulfate standard framework. MPCA must enforce Minnesota's current 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.

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.

These wild rice stands are important to all Minnesota citizens, especially Native Americans. Wild rice is one of our state's prized possessions and we need to put the highest priority on protecting it, especially as a food source for those who truly depend on it.

Sulfate pollution also 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.

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 will at some point be approved.

Thank you,  
Anita Anderson