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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.

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.

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.