Jennifer Hengelfelt

I am writing to ask the MPCA to uphold strong standards to protect our wild rice ecosystem from sulfate harm.

I'm especially concerned that our low-sulfate waters not be degraded, with consequent harm to wild rice viability, especially when allowing so called "site specific standards". These special standards are not vetted by science or history to prove that there will be no harm to wild rice habitat.

The degradation of water quality in lakes, streams, and wetlands in Minnesota is prohibited by both the Clean Water Act and state law. It is imperative that the MPCA takes stringent measures to prevent any deterioration of high-quality, low-sulfate wild rice waters.

The MPCA must adhere to the 10 ppm wild rice sulfate standard when establishing and enforcing permit limits, as well as when conducting TMDL studies and developing implementation plans to facilitate the restoration of wild rice waters categorized as impaired due to excessive sulfate. It is important for the MPCA to not delay or presume that a less stringent standard will eventually be approved, until a "site-specific standard" is officially sanctioned in compliance with solid science, state law and the Clean Water Act.

MPCA and potential polluters must prove that allowed sulfate standards will not cause harm to wild rice abundance, seed productivity, genetic diversity, and nutritional quality.

In addition to harming our sacred wild rice, higher sulfate standards will continue to create a rise in mercury contamination in fish, which will have severe consequences on the brain development of Minnesotans dependent on fish for subsistence.

This negligence will also obstruct the exercise of treaty-reserved rights held by tribal communities. The MPCA should not approve any "site-specific standard" for sulfate discharge in wild rice waters without engaging in tribal consultation and obtaining tribal consent, while also following a formal and transparent rulemaking process.