Tess Dornfeld

My family has harvested wild rice in Minnesota for decades; it is a staple of our shared meals and I just received two more bags as a gift. I appreciate the work of the PCA to identify nearly 2400 wild rice producing waters, and I'm glad to see 20 more of these added to the impaired for sulfate list, although of course I wish it weren't needed.

However, listing these waters as impaired should only be the first step, not the endpoint. Just putting waterbodies on a list and then not doing anything about it is all but pointless. If a TMDL study is needed for impaired waters, then PCA must commit to carry out this study to determine the needed sulfate reduction for wild rice waters, and also IMPLEMENT these reductions to meet the sulfate standard set in law.

The 10mg/L limit is not a goal, it's not a suggestion or even just a recommendation, it is a legal standard that must be met, and PCA must take action to restore the waters that exceed the sulfate standard.

Furthermore, PCA must use its permitting authority to prevent future sulfate impairment of these or any other waters, by including and ENFORCING stringent sulfate limits in permits for mining and other polluting activities.

Mercury impairment is also a serious and urgent toxic threat to the health of ecosystems and of people, especially those who consume contaminated fish and may even rely on this food source, and PCA's current plans to address mercury are also inadequate.

Sulfate pollution exacerbates the impacts from air deposition of mercury, so TMDL studies and restoration plans for mercury impaired waters must all consider these effects as well. Firm deadlines must be set to analyze and reduce watershed mercury levels.

Finally, Dark Lake should be included in the wild rice waters being added to the sulfate impairment list.

PCA seems to be getting the message that it can't just coast when it comes to harmful pollution and ask for forgiveness rather than doing its job proactively. This should be just as true for the waters that sustain us with wild rice and fish as it is for the air we breathe. These are our namesake and our pride, and we must take care of these waters so they can continue to take care of us.