Bruce Johnson

I am a retired environmental scientist with 30 years of experience in Minnesota water quality. I fully support MPCA's identification of 2,395 wild rice producing waters. I would also support listing of 20 additional wild rice waters impaired due to sulfate including Dark Lake, just west of the Minntac tailings basin.

Listing impacted waters is a merely a start. It is critical NPDES permits now modify all existing permits to set limits for both concentrations and mass loadings for sulfate in impaired waters, and enforcing those limits. These steps could restore about half of Minnesota's 55 wild rice waters listed as impaired due to sulfate.

Sulfate is directly tied to the both clinical and non-clinical human mercury impairments in NE Minnesota. One source of mercury is the increases in contaminated fish. MPCA's St. Louis River mercury TMDL, for example, must reflect this fact and the relationship to sulfate.

MPCA must validate its decades-old assumption that mercury air emissions reductions alone will make Minnesota fish safe in 75 percent of mercury impaired waters by 2025. MPCA must reassess mercury in fish, especially in waterbodies threatened by mining and last tested in 1998.