

On behalf of the Area Partnership for Economic Expansion (APEX), I am writing to express concern regarding the continued enforcement of Minnesota's 10 mg/L sulfate standard for wild rice waters. APEX is a private sector-led business development organization serving Northeast Minnesota and Northwest Wisconsin. We are committed to advancing policies that support sustainable economic growth, environmental stewardship, and regulatory clarity.

The current sulfate standard does not reflect modern scientific understanding or site-specific ecological conditions. Wild rice health is influenced by many factors, including water depth, sediment composition, and competition from invasive species. Sulfate levels alone do not determine viability. In fact, wild rice has been observed thriving in waters with sulfate concentrations far above the current limit.

From an economic standpoint, enforcing this outdated standard presents serious risks. According to 2024 EPA guidelines for economic impact analysis, regulatory decisions must consider not only environmental outcomes but also the distribution of economic burdens across industries, workers, and communities. Mining is a cornerstone of Northeast Minnesota's economy. It contributes more than \$1.8 billion annually and supports over 4,000 high-wage jobs. These jobs are often located in communities with limited alternative employment options.

While US Steel's Keetac facility is the focus for this particular enforcement, maintaining this standard will have vast economic ramifications beyond one iron mine or just the iron mining industry. Compliance with the 10 mg/L standard would impose significant costs on nearly the entire state, including municipalities, small businesses, and industrial operators across a variety of business sectors. These costs are not supported by commercially viable treatment technologies. The result could be reduced production, statewide job losses, and even facility closures. Smaller and older operations would be especially vulnerable. EPA guidance emphasizes the importance of evaluating such impacts, particularly when they disproportionately affect specific regions or economic sectors.

We respectfully urge the MPCA to take the following actions:

- Refrain from including sulfate limits in current and future permits until a revised, science-based standard is adopted, as advised by the 2018 Governor's Task Force.
- Reevaluate site-specific standard applications using updated ecological data and stakeholder input.
- Consider the cumulative economic impacts on regional employment, tax bases, and community stability.

Minnesota has a strong tradition of balancing environmental protection with economic opportunity. A modernized approach to sulfate regulation, grounded in current science, economic reality, and prior government work on this specific subject, will better serve our state's long-term interests.

Thank you for your consideration.

Sincerely,

Rachel Johnson

President & CEO, APEX

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