

Wilbert Koskiniemi

To Whom It May Concern at the Minnesota Pollution Control Agency,

As a resident of Northeast Minnesota, I am writing to express concern regarding the proposed enforcement of the 10 mg/L sulfate standard in the draft permit for Keetac. This standard, originally adopted in the 1970s based on research from the 1940s, does not reflect current scientific understanding of wild rice ecology or sulfate behavior in aquatic systems.

From a scientific perspective, requiring sulfate compliance at each individual outfall—when all discharges enter a single receiving water body—does not yield representative environmental data. A downstream compliance point would more accurately capture cumulative impacts and better inform ecological risk assessments.

Moreover, the MPCA's rejection of two site-specific sulfate standard (SSS) applications for Hay Lake, despite adherence to agency guidance and evidence of sustained wild rice health over nearly 60 years of discharge, raises concerns about the integration of empirical data into regulatory decisions. Research from the University of Minnesota and the 2018 Governor's Task Force on Wild Rice confirms that wild rice resilience is influenced by multiple factors—including iron and organic carbon content—and that no single sulfate threshold is universally applicable.

Beyond environmental science, this issue carries significant economic implications for our region. Mining is a cornerstone of Northeast Minnesota's economy, contributing over \$1.8 billion annually and supporting more than 4,000 family-sustaining jobs. These positions offer wages significantly above the regional average, with mining workers earning approximately \$1,708 per week, nearly \$950 more than the average across all industries. The sector also accounted for over one-third of net new jobs in the region during recent growth periods.

The enforcement of an outdated sulfate standard threatens not only environmental integrity but also economic stability. Without a modern, site-specific, and scientifically defensible approach, Minnesota risks undermining industries that provide high-quality employment and economic resilience to rural communities.

I respectfully urge the MPCA to:

- Refrain from including sulfate limits in Keetac's permits. If limits are retained, revise the permits to include a single downstream compliance point and allow sufficient time for compliance.
- Fulfill the 2011 legislative mandate to update the sulfate standard using current ecological science and site-specific data.

Minnesotans deserve a regulatory framework that supports clean water, healthy ecosystems, and thriving communities. I encourage others to attend the upcoming public meeting and submit comments to ensure our voices are heard.

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