

Susan Raffo

It's hard to write a comment to a large-scale institution. Everything about this issue is about competing world views on the relationship between the economy, the environment, culture and what it means to ensure a safe and thriving world for future generations. This is not really a rational conversation that can be assessed as though it is a math problem, but I know that is part of what the Minnesota Pollution Control Agency needs to do. So, if I were to turn this into a math-based assessment, I would lay things out like this: first, there is the cultural truth of what it means that manoomin is central to Anishinaabeg culture and has its own right to exist and that anything that threatens the livelihood of manoomin threatens the cultural interconnection between manoomin and Anishinaabeg people. Much of the treaty provisions made by the federal government with the Ojibwe people were written at a time before current technology. Part of our treaty agreement is that we honor and protect Ojibwe land that was ceded to the US government through a range of treaty agreements. By making choices that will inadvertently impact treaty land, in this case by impacting the wild rice that is central to Ojibwe life, we are breaking treaty. In 1837, the United States "guaranteed" Anishinaabe people the right of "gathering the wild rice, upon the lands, the rivers and the lakes included in the territory ceded," forever, in exchange for title to that territory (1837 Treaty with the Chippewa). An 1855 Treaty transferred title of more Anishinaabe land to the United States— including the land holding the Keetac mine— but again retained the right to gather rice from the land and waters (1855 Treaty with the Chippewa; *Minnesota v. Mille Lacs Band of Chippewa Indians*, 526 U.S. 172 (1999)). More than a generation ago, in 1973, Minnesota made good to protect that promise when it passed the 10 mg/L sulfate standard. Wild rice is of spiritual and cultural importance to Ojibwe people and that doesn't have to make sense to non-native people any more than Christianity has to make sense to non-Christians.

Second, western cultural economies have mostly not focused on the importance of biodiversity when assuming a future for those to come. Manoomin is at the center of an ecosystem in northern Minnesota and has to be protected so that the land itself is also protected.

And third, struggling economies in rural areas are real. I just completed a year long walk across the United States in order to talk with folks about how all of this fits together: honoring indigenous right to land, environmental protections, agricultural policy and economic struggles. Again and again I had conversations with people who were willing to think through how all of these pieces can fit together but it depended on not being set up as a power struggle between disparate interests. The only way to do that is to have this be a conversation among people impacted and not corporate interests.

Please protect the rice.

Susan Raffo