

United Way of Northeastern Minnesota (Erin Shay)

Good evening,

I am writing to provide comments on the draft NPDES permits MN0055948 and MN0031879 for the U. S. Steel Keetac tailings basin and mining area. Like many Minnesotans, I value a strong, healthy environment and understand the importance of supporting good jobs and vibrant communities. The organization I proudly work for and represent, United Way of Northeastern Minnesota, exists to help people and communities thrive across the Iron Range, Koochiching County, and Lake of the Woods County. We do so almost entirely with the support of local people, companies, and municipalities. But when the foundation of our region's economy is threatened, our ability to meet those community needs begins to crumble right alongside it.

Mining contributes over \$1.8 billion to Minnesota's economy each year and supports more than 4,000 family-sustaining jobs in Northeast Minnesota - jobs that pay nearly \$950 above the regional average. These are not just numbers on a page; they are parents able to put food on the table, children able to grow up with opportunity, and small towns able to survive. The taconite tax alone keeps schools strong, maintains infrastructure, and funds essential local government services. When mining falters, the ripple effect is devastating: classrooms lose resources, communities face impossible budget gaps, nonprofits like ours lose critical funding, and families are left with heartbreaking choices.

The mining industry - at both the corporate and individual level - represents the single largest group of contributors to our United Way's local work. Without these jobs and without this support, the safety net for our neighbors quickly unravels. We see it firsthand: when a mine closes its doors, even temporarily, food shelf demand spikes, children lose stability, and mental health crises rise. These effects stretch far beyond the Iron Range; they ripple across the entire state, touching the very heart of Minnesota's economy and identity.

The proposed compliance schedule for Keetac is simply not realistic. No proven, cost-effective sulfate treatment options exist today, and more time is needed to research and develop solutions that protect both natural resources and economic stability. Additionally, Keetac's discharges all flow to a single water body. The permits should use one compliance point that reflects these combined discharges, rather than requiring separate limits at each outfall. MPCA should also reconsider the site-specific standard applications submitted for Hay Lake, where healthy wild rice has grown for decades despite Keetac's discharge.

I am concerned about the Minnesota Pollution Control Agency's (MPCA) sulfate water quality standard of 10 mg/L for wild rice waters. This outdated rule, which MPCA was directed to review and update in 2011, has yet to be revised to reflect modern science or site-specific conditions. Enforcing this 10 mg/L standard has serious consequences for Minnesota mines, local governments, and businesses across the state.

Wild rice health is influenced by multiple factors including water depth, fluctuation, competing vegetation, and predation — not just sulfate levels. In fact, wild rice has been shown to thrive in waters with much higher sulfate concentrations. Compliance with the 10 mg/L standard is not attainable with current technology and would place enormous costs on wastewater facilities, small

businesses, and mines that provide thousands of good-paying jobs. A modern, science-based standard is needed.

We all want clean water, healthy wild rice, and strong communities. But we cannot ignore the human cost of outdated regulations. With the right science-based approach, we don't have to choose between protecting natural resources and protecting Minnesota families.

In summary, I urge the MPCA to:

- Refrain from including sulfate limits in Keetac's permits, or if limits remain, adjust the permits to include a single downstream compliance point and a realistic compliance schedule.
- Update the 10 mg/L sulfate standard as required by law, ensuring it reflects modern science, site-specific conditions, and practical implementation.

Minnesota's future - its schools, its communities, its economy - is intertwined with mining. If this foundation is weakened, it is not only the Iron Range that suffers, but every corner of our state that feels the impact. When our classrooms shrink, when families are forced from their hometowns - the consequences do not stop at the county line. They ripple outward, eroding the very stability that allows Minnesota to thrive.

I urge you to recognize what is at stake here. The decisions made in this permit process will help determine whether we can continue to provide good jobs, strong schools, healthy communities, and a future where both our environment and our people can flourish together.

Thank you for listening to the voices of our region and for your consideration of these comments.