

To: Minnesota Pollution Control Agency (MPCA)

Attn: Sign-on Letter from Environmental Organizations, Community Organizations, and Individual Citizens

Re: Enforcement of the 10 mg/L Sulfate Standard in the Keetac Permit and Beyond

The Great Lakes region is home to most of the world's wild rice. In Wisconsin and Michigan, where there is no sulfate standard, wild rice has suffered greatly and is far less abundant than here in Minnesota. That shows us what is at stake. The 10 mg/L sulfate standard is a critical safeguard for wild rice (manoomin), clean water, and public health. We write to thank the MPCA for your commitment to upholding this law and to urge you to remain steadfast in enforcing this standard in the Keetac permit and in all future permitting decisions.

By upholding Minnesota's sulfate standard, we hold companies accountable for their pollution and protect a food that has nourished people here for generations — and, if cared for, will continue to feed generations to come.

Why Enforcement Matters

The 10 mg/L sulfate standard, adopted in 1973, is the only numeric water quality standard in the United States designed specifically to protect wild rice waters ([MPCA, Wild Rice Standard, 2011](#)). Courts and the EPA have repeatedly reaffirmed that Minnesota must enforce this standard under the Clean Water Act. The MPCA has no discretion to delay or weaken its application ([WaterLegacy, 2024](#)). Scientific evidence shows that sulfate pollution harms wild rice and contributes to methylmercury formation. That, in turn, contaminates fish and endangers human health, especially the health of children ([Myrbo, Et Al. 2017](#); [WaterLegacy](#)).

Treaty Rights and Legal Obligations

Minnesota's protection of wild rice is not accidental. In 1837 in exchange for ownership of much of the land that would become Minnesota, the United States "guaranteed" to the Ojibwe their reserved right of "gathering the wild rice, upon the lands, the rivers and the lakes included in the territory ceded," in perpetuity ([1837 Treaty with the Chippewa, Art. 5](#)). Wild rice, the only species protected in the treaty by name, is a sacred element of Ojibwe cultural identity. Its protection is central to Indigenous lifeways ([Tribal Task Force on Wild Rice](#)). The United States Supreme Court has reaffirmed that this right is federally protected and cannot be infringed by the State of Minnesota because under Article VI of the U.S. Constitution, the treaty is the "supreme law of the land" (U.S. Constitution, Art. VI; *Minnesota v. Mille Lacs Band of Chippewa Indians*, 526 U.S. 172 (1999)). Minnesota's sulfate standard honors the United States' promise by protecting the rice. Granting sulfate variances known to harm the rice undermines these treaty guarantees ([EPA, Stateline, 2024](#)).

Health and Environmental Protection

Elevated sulfate levels do not just harm wild rice. They increase methylmercury in fish, poisoning the fish *and* the people who depend on those fish as a food source. This risk is especially severe for pregnant women and young children ([EPA](#); [Water Legacy](#)) Mining has already caused widespread mercury contamination in Minnesota lakes and rivers. Allowing sulfate pollution from mining to continue to add to this burden would deepen harm to both ecosystems and public health. And respect for the land means respect for our own health. What happens to the land happens to the people who depend on it.

Sustainable Economies

The Minnesota Pollution Control Agency is responsible for controlling pollution in Minnesota, not for protecting the profitability of out-of-state corporations and international conglomerates. U.S. Steel did not provide written evidence that treatment costs to comply with Minnesota law would cause a slowdown or shutdown at Keetac, so the MPCA cannot consider profit impacts as grounds for a variance. Moreover, the idea that mining creates jobs is a myth. Even in the Arrowhead, mining accounts for only 6% of employment– just over 4,000 jobs ([Minnesota Employment and Economic Development, Region 3: Northeast Minnesota 2024 Regional Profile](#)). In contrast, leisure and hospitality– industries that depend on clean water for fishing, wild rice stands for fowl habitat, and a steady flow of visitors who want to see the beauty of Minnesota– account for 11.9% of jobs in the region ([Minnesota Employment and Economic Development, Current Employment Statistics](#)).

There is more than one way to feed our families. By requiring U.S. Steel to follow Minnesota law and clean up after itself, we can create lasting jobs that protect our communities from pollution rather than deepening harm. And by protecting wild rice, the MPCA also protects the significantly larger portion of hospitality and recreation jobs that depend on clean water for fishing, wild rice stands for fowl habitat, and a steady flow of visitors who want to see the beauty of Minnesota, not poisoned landscapes and tailing ponds.

Precedent for the Future

Minnesota faces multiple new mining proposals that would further threaten critical ecosystems and treaty-reserved resources. Enforcing the sulfate standard now makes clear that the MPCA will enforce the will of Minnesota's elected leaders expressed in state law. And it teaches that corporations must meet state environmental standards, not sidestep them through administrative loopholes. Respecting the standard that the legislature set more than a generation ago respects the democratic will of Minnesotans. It implements the protections that the legislature set to protect the only plant that is named in the treaties that allowed its formation and that is core to so many of our understandings of what it is to be Minnesotan.

Our Call

We call on the MPCA to:

- Follow the 10 mg/L wild rice sulfate standard in the Keetac permit and all future permits.
- Reject variances that allow out-of-state corporations to pollute for profit at the expense of Minnesotans' treaty rights and public health.
- Honor treaty obligations by protecting wild rice, waters, and ecosystems central to Indigenous lifeways.
- Demonstrate leadership by holding polluters accountable, ensuring clean water and a healthier future for all Minnesotans.

Sulfate enforcement is not just a matter of environmental protection; it is a matter of law, justice, and respect for both Indigenous Nations and future generations.

Signatures of Organizations and Individual Citizens of Minnesota

- 1.) Avonna Stark | State Director | Clean Water Action
- 2.) B. Rosas | Policy Manager | Climate Generation
- 3.) Clara Sanders | Membership Organizer | Land Stewardship Project
- 4.) Dawn Goodwin | Co-Founder | R.I.S.E Coalition
- 5.) Deanna Standing Cloud | Ziigwan Indigenous Wellness
- 6.) Dr. Karen E. Willis | Co-Leader | Indivisible South Metro Minnesota
- 7.) Erica Crazy Hawk | Indigenous Earth Protectors-Twin Cities
- 8.) Ernest Oppegaard-Peltier | Co-Executive Director | Mukwa Miikana
- 9.) Fran Ludwig | Co-Chair | Laudato Si' Movement
- 10.) Jean Ross | Vote Climate
- 11.) Jessica Intermill | Intermill Land History Consulting
- 12.) Judy Gibbs | Board Member | McCabe Chapter of the Izaak Walton League
- 13.) Kate Winsor | Northeast Climate Action
- 14.) Kathleen Harder | Mountain Lake Repair Community
- 15.) Maggie Shcuppert | Director of Strategic Initiatives | CURE

- 16.) Matt Norton | Policy & Science Director | Save the Boundary Waters
- 17.) Margot Munson | Pollinator Friendly Alliance
- 18.) Pouya Najmaie | Policy and Regulatory Director | Cooperative Energy Futures
- 19.) Rich Harrison, PLA, Co Director of Design | Metro Blooms Design + Build
- 20.) Rev. Dr. Ry Siggelkow | Leadership Center for Social Justice
- 21.) Patty O' Keefe | Midwest Regional Director | Vote Solar
- 22.) Lynn Sue Mizner | Owner-operator Chengwatana Community Farm
- 23.) Mary Davidson | UU Fellowship of Northfield
- 24.) Ole Olson | United Faith Community | UCC
- 25.) Rachel Wagner | President | Just Housing SBC
- 26.) Rev. John Sippola | Creation Care Team of Lutheran Church Duluth
- 27.) Rev. Dr. Rebecca Voelkel | Director | The Center for Sustainable Justice at Lyndale UCC
- 28.) Rev. Lisa Friedman | Unitarian Universalist Church of Minnetonka
- 29.) Tammy Flemming | Maple Grove Citizens for Sustainability
- 30.) The Rev. Lindsey Briggs | Saint Mary's Episcopal Church
- 31.) Sister Carolina Pardo | Sisters of Saint Francis, Rochester Minnesota
- 32.) Elizabeth Kittleson | Creekside Church UCC
- 33.) Kelly Skumautz | Health Professionals for a Healthy Climate
- 34.) Emily Levang | Waankam People for the Estuary

35.) Janet Tripp

36.) Laruen Buxton

37.) Linda Mofle

38.) Patrick Dougherty

39.) Penelope Tower

40.) Renee Carey

41.) Susan Lampe

42.) Sarah Campbell

43.) Ann Bourg

44.) Rev. Susie Hayward

45.) Alice Madden

46.) Bill Konrardy

47.) Bob Nesheim

48.) Carol Shimek

49.) Craig Rymer

50.) Denise Marlowe	77.) Amy Grace	105.) Cindy Angerhofer
51.) Duane Franz	78.) Andrea Kuenning	106.) Claire Cooke
52.) Shella Franz	79.) Ann Pannier	107.) Connie Ford
53.) Erica Graen	80.) Barb Gacek	108.) Corey Friend
54.) Fletcher Wolfe	81.) Barbara Akre	109.) Corinne D.
55.) Gail Mulcahey	82.) Barbara Clark	110.) Dan Vogel
56.) Great Grandmother Mary Lyons	83.) Barbara Spies	111.) Dana Jackson
57.) Harry Greenberg	84.) Beatel Iliff	112.) Daniel Dahm
58.) Janet Tripp	85.) Berri Reiser	113.) Danielle Indovino Cawley, disability self-advocate
59.) Jona Peters	86.) Beth Feckter	114.) Darnell Barsness
60.) Julie Boada	87.) Beth Tamminen	115.) David Bowman
61.) Kim Sutton	88.) Betsy Leighton	116.) David Councilman
62.) Mark R Safford	89.) Beverly Arro	117.) David Engelstad
63.) Mark T. Lundholm	90.) Blaishia Lee	118.) David Leppik
64.) Matt Brown	91.) Brett Cease	119.) Dawn Blomgren
65.) Mr. Thomas Young	92.) Brett Ostby	120.) Deb Heuwinkel
66.) Peter Schulze	93.) Bruce Garbisch	121.) Debby Evans
67.) Richard VandenDolder	94.) Buff Grace	122.) Dennis Olsen
68.) Tanya Beyer - wildlife artist	95.) Caitlin Callenson	123.) Diana Cumming
69.) Alexis Racciatti	96.) Cali Jirsa	124.) Diane Bearman
70.) Thomas Mrotz	97.) Cameron Roberts	125.) Diane Haines
71.) Pastor Richard Magnus	98.) Carol Frechette	126.) Diane Peterson
72.) Adam Moore	99.) Carol Heckmann	127.) Don Schuld
73.) Aleta Borrud, MD MPH	100.) Caroline Miesle	128.) Donna E. Clark
74.) Alex Carroll	101.) Christina Daniel	129.) Dorothy' Kress
75.) Allan Campbell	102.) Christine A Kwong	130.) Douglas Heuer
76.) Allen Gibas	103.) Christine Baeumler, Professor, University of Minnesota	131.) Dr. Cia Sautter
	104.) Christine Osman	132.) Dr. Emily Hagen

133.) Elizabeth Jarrett
Andrew
134.) Ellie Schmidt
135.) Esther Ouray
136.) Gail Morrison
137.) Genevieve
Radniecki
138.) Ginger Sisco
139.) Ginny Rudloff
140.) Greg Fynboh
141.) Gretchen Griffin
142.) Gwendolyn Werdin
143.) Henry Walker
144.) Holly J Kellar
145.) Jack Kattner
146.) Jackie Smolen
147.) James Ludowese
148.) Janet Magree
149.) Janice Hallman
150.) Jean A Cleary
151.) Jean Walsh
152.) Jeanne Hoecker
153.) Jeanne Wright
154.) Jeff Stromgren
155.) Jennifer Manner
156.) Jim Niland
157.) Jodi Peterson
158.) Joe Stanley
159.) Juanita
Reed-Boniface
160.) Judy Gronquist
Grant

161.) Judy Harder
162.) Kaitlyn Walter
163.) Karen Alexander
164.) Kathleen
McDonough
165.) Kathryn Gilje
166.) Kathy Brynaert
167.) Katie Gant
168.) Kay M. Randall
170.) Kay Slama
171.) Linda Jokela
172.) Linda Ruetz
173.) Luisa Cichowski
174.) Maggie O'Connor
175.) Malini Basu
176.) Marc Markell
177.) Marcy Leussler
178.) Margaret
Michaelson
179.) Marian McKone
180.) Marian Nichols
181.) Marijo Hickok
182.) Mark Holm
183.) Marvin Napgezek,
md
184.) Mary Adair
185.) Mary Beckman
186.) Mary Harrison
187.) Mary Jean Mulherin
188.) Mary Krick
189.) Mary Lillo

190.) Matt Rohn
191.) Megan Reich
192.) Melissa Bergstrom
193.) Michelle Hensley
194.) Micki Rasmussen
195.) Misty Butler
196.) ML Wilm
197.) Moe Sadique
198.) Mr David Wee
199.) Mr. James Herther
200.) Ms JL Angell
201.) Nancy Hauer
202.) Nancy K Metz
203.) Nancy Stutzman
204.) Natali
205.) Pam Hauer
206.) Pam Roiger
207.) Pastor Kate Reuer
Welton
208.) Patricia Olson
209.) Pattymipl McGrath
210.) Paul Englund
211.) Paul Tuveson
212.) Peder Otterson
213.) Rev Dwight
Wagieniwi
214.) Rev. Clara Sanders
215.) Rev. Deborah
Braun
216.) Rev. Denise
Stahura
217.) Rev. Diana McLean

218.) Rev. Dr. Anita L. Bradshaw	243.) Susie Petra	270.) Cathlin Mahal
219.) Rev. Dr. Karen Smith Selers	244.) Talitha Anderson	271.) Alexis Lathrop
220.) Rev. Jane McBride	245.) Tamar Rubin-Calvert	272.) Tom Griffin
221.) Rev. Karen R. Larson	246.) The Rev. Pamela Fickenschner	273.) Anya Stupar
222.) Rev. Mark Schlasner	247.) Thom Haines	274.) Helen Nikiel
223.) Rev. Paula Bidle	248.) Timothy Leary	275.) Teena Bolin
224.) Rev. Richard Sellers	249.) Tom Houle	276.) Susie George
225.) Reverend Roberta M Haskin	250.) Tom neilson, Ed.D.	277.) Heidi Voss
226.) Robert Brown	251.) Trish Grose	278.) Judy Jungwirth
227.) Roger Miller	252.) Vernita Kennen	279.) Torey
228.) Sam Blackwell	253.) Wallace Wadd, PharmD	280.) Richard McCormick
229.) Sam Tindall	254.) Wesley Sisson	281.) Kelsie Marie
230.) Sarah Gettel	255.) Zoe Bird	282.) Dorothy Williams
231.) Sarah McCarthy	256.) Rabbi Arielle Lekach-Rosenberg	283.) Hannah Jensen
232.) Scott Tower	257.) Jean M. Gilruth	284.) Hannah Campbell Gustafson
233.) Sean MacManus	258.) John Bankson	285.) Grant Tillery
234.) Sidney Brown	259.) Kathryn Guimaraes	286.) Sydney Petersen
235.) Sister Brenda Lisenby	260.) DeeDee Edlund	287.) Julie A. Sanders
236.) stephanie johnson	261.) Gloria Englund	288.) Sandra Hoffman
237.) Stephanie Putzier, MD	262.) Kristi Lentz	289.) Shelly Zuzek
238.) Steven Besser	263.) Don Rideaux-Crenshaw	290.) Kaydelle Kvarnlov-Leverty
239.) Steven Reiser, Pastor	264.) Jonathan Swoyer	291.) Brian Buxton
240.) Susan Cortilet Jones	265.) alexzandra lucia	292.) Denise Marlowe
241.) Susan S. Austin	266.) Gina Peltier Eele	293.) Susan Macpherson
242.) Susie Osaki Holm	267.) Peggy Thompson	294.) Jeff Richards
	268.) Jane Wagner Murphy	295.) Dan Krivit
	269.) Alice West	296.) Lynn Indihar
		297.) Rachel Geissinger

298.) Hannah Logan	326.) Marcia Lewis	352.) Janice Wiechman
299.) Lois Norrgard	327.) Terry Hokenson	353.) Janet Tripp
300.) Tara Fahey	328.) Emily Krumberger	354.) Maren Solheim
301.) Steve Clemens	329.) LeEtta Flicker	355.) Mary Ellen Kavanaugh
302.) Allan Malkis	330.) Margaret Rozycki	356.) Amy Orecchia
303.) Ellen Mueller	331.) Carolyn Hendrixson	357.) Evelyn Kent
304.) Mary Schiltgen	332.) Miranda Bryan	358.) Nicole Hill
305.) Orren Fen	333.) Gary Adams	359.) Emily Thompson
306.) Finley Anderson Newton	334.) Terry McAnnany	360.) Rachel Crippe
307.) Tim Wulling	335.) Linda Nelson	361.) Candace Linares
308.) Margie Hake	336.) Tracy van der Leeuw	362.) Bruce Eldevik
309.) Minnow Whaley	337.) Rebecca Cramer	363.) Diane Hirigoyen
310.) Deacon Alex Theship-Rosales	338.) Sonja Peterson	364.) Elizabeth Andrews
311.) Teresa Wasick	339.) Leah	365.) John Kearney
312.) Rev. Catherine Malotky	340.) Dawn M Nothwehr, OSF, Ph.D.	366.) Meg Arnosti
313.) O Stremple	341.) Elizabeth Raasch-Gilman	367.) Jennifer Rome
314.) Janet Groenert	342.) Alexandra Boese	368.) Anna Ebbers
315.) Christine nelson	343.) Dr.Tom Small	369.) Deb Frank
316.) Patricia Eliason	344.) Kathleen Harder	370.) Karen Wiebe
317.) Christine Popowski	345.) Rev. Onryu Kennedy	371.) Bronwen Lu
318.) Sandra Spieler	346.) Beth Aune	372.) Isaiah Wanbli Friesen
319.) Kathy Haskins	347.) Hannah H Mississippi	373.) Jane Carlson
320.) Rachael Hanson	348.) Sue Lyback LSW Emeritus	374.) Leah Grunzke
321.) Dr Lyn Pegg	349.) Kateri Krantz-Odendahl	375.) Sarah Weaver
322.) Kathryn Palmer	350.) Dr. Paula Thomsen	376.) Sally Nankivell
323.) Jerry Blume	351.) Stephani Schmidt	377.) sally downing
324.) Barbara Peterson		378.) Leah Fifield
325.) Gretchen Goodman		379.) Ava Corey-Gruenes

380.) Gail Irish	406.) Gina Eele	432.) Heather Olson
381.) Rev. Chris Bohnhoff	407.) Donna Perleberg	433.) Christi Kaehn
382.) Elizabeth Andress	408.) Nancy Ott-Pinckaers	434.) Claudia Poser
383.) Justine Wuebold, individual	409.) Max Gries	435.) Mr. Thomas Young
384.) Peggy Roeske	410.) Dina Johnson	436.) Deb Klein
385.) mary pettigrew	411.) Rabbi Jessica Rosenberg	437.) Ronald Lanham
386.) Gloria Karbo	412.) Sherri Knuth	438.) Larry Goose
387.) Alice Meadow	413.) Mary Ann Van Curs	439.) Lenae Butcher
388.) Sara Barsel, Ph.D.	414.) Cris Nelson	440.) Amber Whitebird
389.) Mary Burger	415.) Alice Madden	441.) Pat Goodwin
390.) Brian Moe	416.) AP Looze	442.) Savanna Antell
391.) Nash Edgerton Hall	417.) Nathan Hofstad	443.) Stephanie Kelley
392.) Susan Keller, Environmental Activist	418.) Carrie Garcis	444.) Nakita Nicazio
393.) Kurt Schultz	419.) Jeanne Landkamer	445.) Faron Jackson
394.) Lauren Kofsky	420.) Elyria Grote	446.) Paris Nicazio
395.) Debra Avenido	421.) Dr. Kris Gebhard	447.) Ryan White
396.) Pastor Richard Magnus	422.) Rachel Bly	448.) Kelly Goose
397.) Pr Natalia Terfa, Edina Community Lutheran Church	423.) Maggie Pastarr	449.) Rebecca Keillor
398.) Deacon Lauren Morse-Wendt	424.) Sarah Stevenson	450.) Nell Schaefer
399.) Mary Vlazny	425.) Ronna Vinge	451.) Shannon Kubenez
400.) Keith H. Olstad	426.) Susan Roedl	452.) Shannon Young
401.) Lawrence Edlund	427.) Arlene Mathison Legislative Team Member	453.) Leanna Goose
402.) Karen Boyum	428.) Lynn Shuck	454.) Besty LePlatt
403.) Tess Dornfeld	429.) Trevor Roark	455.) Dorothy Hammer
404.) Ariella Tilsen	430.) Leroy Staples Leech Lake Band of Ojibwe District 3 Representative	456.) Leslie Forman
405. RJ Lawrence	431.) Amy Elliot	457.) Kris Jacobson
		458.) Marjorie Huebner
		459.) Joshua Spitzner
		460.) Rebecca Tkachuk

461.) Margaret Jackson

462.) Roya Damsaz

463.) Adele Lennig

464.) John Byom

465.) Ruth Hiland

466.) Harvey Benson

467.) Claren Sellner

468.) Paula Mohan

469.) Valarian Kingbird