



MESERB

Minnesota Environmental Science
and Economic Review Board

Using science and economics to improve environmental regulations

November 2, 2018

Katie Pratt
Minnesota Environmental Quality Board
520 Lafayette Road
St. Paul, MN 55155

Re: Governor's Task Force on Wild Rice

Dear Ms. Pratt and members of the Governor's Task Force on Wild Rice,

Thank you for the opportunity to comment as you work toward your recommendations for protecting wild rice. The following comments are offered on behalf of the Minnesota Environmental Science and Economic Review Board (MESERB), a joint powers organization of 50 cities, public utilities commissions and sanitary sewer districts. MESERB is made up of operators, technicians and directors at municipal wastewater facilities and has worked since 1997 to ensure that regulations affecting wastewater treatment are reasonable, effective and based on sound science.

Our members take their role as stewards of our state's waters seriously. Because of their role in protecting Minnesota's waters at their wastewater facilities, MESERB members are among those who will be most affected by the work of the wild rice task force.

As you make your recommendations, we urge you to propose solutions that will result in the actual long-term protection of wild rice. The status quo, the old 10 mg/l standard, is not the answer. From a municipal wastewater perspective, complying with the standard is not technologically or economically feasible. A water quality standard that relies immediately on variances is not sound and will not result in the protection of wild rice. Moreover, from a scientific perspective, there is no evidence that the current standard—even if it could be achieved—would offer wild rice protection.

It is also essential that any recommendations strive to avoid unintended consequences. For example, adding reverse osmosis at wastewater facilities to remove sulfate would usher in other environmental problems. The sludge left over from the process is difficult and expensive to safely dispose of. Similarly, any solution that requires municipalities and the state to spend tens or hundreds of millions of dollars on treatment that may not protect wild rice would divert scarce resources that could be deployed to address other water quality problems in a more effective manner.

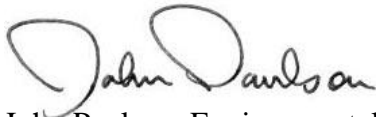
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We understand that finding solutions is not easy. The most immediate next steps likely require digging deeper into recent studies and developing a better understanding of the water conditions that allow wild rice to thrive. The task force should also consider setting goals for protecting wild rice that are attainable. A standard or goal that is perfect in theory, but that cannot be achieved does nothing to advance the protection of this important resource.

Thank you for your consideration. If we can provide any further assistance, please contact me at JPaulson@ci.hutchinson.mn.us.

Yours truly,

MINNESOTA ENVIRONMENTAL SCIENCE AND ECONOMIC REVIEW BOARD

A handwritten signature in black ink, reading "John Paulson". The signature is fluid and cursive, with the first name "John" and last name "Paulson" clearly distinguishable.

John Paulson, Environmental and Regulatory Manager, City of Hutchinson
MESERB Vice-President

cc: MESERB members