

Major Differences of Opinion

Wild Rice

Wild rice is the reason that Ojibwe people live here.

- Ojibwe oral tradition explains that centuries ago the people were instructed in a vision to find the place where "the food grows on the water." Their long migration from the eastern seaboard lead them around the Great Lakes and ultimately to the shores of Lake Superior and inland lakes and rivers of northern Michigan, Wisconsin and Minnesota where manoomin or wild rice ("the food grows on the water") was found in abundance. Wild rice is seen as a special gift from the Creator and became a staple of the Ojibwe diet. Wild rice is basic to the traditional diet and important culturally and spiritually and is a central element in feasts and ceremonies.

Wild rice grew in every tributary to the St. Louis River in 1899.¹

- Wild rice waters have significantly declined in the St. Louis River watershed due to pollution and hydrologic modifications.
- Both the Tribes and State have significant concerns about maintenance of natural stands of wild rice due to loss of genetic diversity².

Wild rice areas are not only protected under the 1854 Treaty but under Minnesota State law.³

- 1997 amendments to Minnesota's 7050 wild rice protection rule include language about the importance of wild rice to Indian tribes⁴.

Prior to discharges from the LTV tailings basin and Area Pit 5 NW wild rice grew in the Project area in the Embarrass River.

- Wild rice was harvested by Tribal Elders in the upper Embarrass River.⁵
- Wild rice (paddy rice) was grown at a rice farm between the old LTV tailings basin and the Embarrass River from 1957-1993.

Wild Rice Water Quality Standard will not be achieved through proposed engineered controls.

- Wild rice growing in the Partridge River and Second Creek has been documented by Tribal staff and MPCA. The wild rice water quality standard is exceeded in Second Creek, the Embarrass and Partridge Rivers.⁶

¹ A.E. Jenks, *The Wild Rice Gatherers of the Upper Lakes*, 1901.

² SONAR, 1997, *supra*, p. 23

³ See Minn. R. [7050.0224](#), subp. 1. which states: In recognition of the ecological importance of this resource, and in conjunction with Minnesota Indian tribes, selected wild rice waters have been specifically identified [WR] and listed in part [7050.0470](#), subpart 1. The quality of these waters and the aquatic habitat necessary to support the propagation and maintenance of wild rice plant species must not be materially impaired or degraded...

⁴ SONAR, 1997, *supra*, p. 40

⁵ Rose Berens, Bois Forte THPO, 2010

⁶ MPCA, What's in My Neighborhood, DMR data, can be found at:

<https://www.google.com/#q=mPCA+what%27s+in+my+neighborhood>

Information prepared by staff from the tribal cooperating agencies and supporting intertribal agencies: Fond du Lac Band of Lake Superior Chippewa, Grand Portage Band of Lake Superior Chippewa, Bois Forte Band of Chippewa, Great Lakes Indian Fish & Wildlife Commission and the 1854 Treaty Authority

- To comply with the wild rice sulfate standard, the Polymet project relies on engineering controls that capture and treat mine related effluent. These controls must function perfectly for hundreds of years. The assumption that this will occur is neither reasonable nor realistic.
- Engineering controls include the seepage capture system at the flotation tailings basin, the cap and liner system at the hydrometallurgical tailings basin, and the discharge control feature for the west pit lake. Failure or under-performance of any of these features will result in water quality impacts that are not described in the SDEIS.
- The assumed performance of water capture systems in the SDEIS is of 90% or greater. This high level of performance is not realistic based on other capture systems installed at a similar tailings facility.
- The assumption that human constructed water capture and treatment facilities will operate for hundreds of years is not believable.

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