



Capitol Region Watershed District

595 Aldine Street
Saint Paul, MN 55104
(651) 644-8888 • capitolregionwd.org

January 21, 2026

Amy Hadiaris
Minnesota Pollution Control Agency
520 Lafayette Road N
St. Paul, MN 55155-4194

Re: Comments on Revised Focused Feasibility Study for Ford Area C

Dear Ms. Hadiaris:

Capitol Region Watershed District (CRWD) appreciates the opportunity to provide comments on the Revised Focused Feasibility Study for Ford Area C, dated October 2025 (Feasibility Study). It is encouraging that after several years of monitoring and assessment, the project has progressed to a point of determining a path forward for addressing the industrial and construction waste that was placed adjacent to the Mississippi River. Based on significant monitoring and assessment, the Minnesota Pollution Control Agency (MPCA) and the Minnesota Department of Health have determined the environmental and human health risks are low for the site. The Feasibility Study evaluates a wide range of potential solutions for dealing with the waste and recommends Alternative 3, which includes targeted removal of waste and slope stabilization.

We understand that the MPCA has selected Alternative 4, which goes a step above Ford Motor Co.'s (Ford)'s preferred alternative and includes removal of all reasonably accessible industrial waste and slope stabilization.

The remedial planning process has reached a critical point in the process to determine the best possible environmentally sound outcome that is protective for future generations. Not achieving an effective long-term cleanup solution now will almost certainly result in increased future risk to the environment and subsequently increased costs for future generations. With these considerations in mind, CRWD offers the following recommendations:

1. *Recommendation: The slopes on the site proposed for Alternative 4 should be reduced for more certain long-term stability.*

Some of the steep slopes at Area C are not stable and have failed. Alternative 4 allows very steep slopes to remain at the site. CRWD believes leaving the slopes at the proposed grade involves on-going risk for the Mississippi River, the community and Ford. This risk becomes magnified under changing climate conditions with more frequent, higher volume, intense rainfall events that are more erosive and could lead to more frequent and severe slope failure. Slope failure

would deliver sediment directly to the Mississippi River and potentially expose more of the industrial waste. Of most concern is the southern portion of the site where the slopes are the steepest, the industrial waste is closest to the surface, and slope failures have already occurred. The revised feasibility study indicates geotechnical analysis was completed suggesting the proposed slopes will be stable after project completion. CRWD has requested this analysis for review and thus far has not received that analysis. This information is critical and should be confirmed given its importance for the basis of the remedial decision.

CRWD remains steadfast in its recommendation that Ford should evaluate an additional alternative that lessens the slopes of the site. This was not done in the revised Feasibility Study as CRWD previously requested. Lessening the slopes on the south side of the site would require extending the toe of the slope and/or pulling back the top of the slope. We understand that extending the toe of the slope into floodplain areas not owned by Ford is likely a non-starter. However, it is unclear why Alternative 4 does not pull the top of the slope back further than the extent of the existing parking lot. CRWD recommends that removal of a portion of the parking lot be evaluated to reduce slopes and potentially increase the accessible waste removal volume. In summary, CRWD believes more investment now to reduce slopes on the site will minimize financial risk in the long term and protect stakeholders, the community and Ford into the future.

2. *Recommendation: An evaluation of the system's performance under intense, large magnitude rainfall events, including the 500-year storm events should be completed.*

The 500-year event is a surrogate for future climate conditions. Alternative 4 relies on the existing parking lot and its associated drainage system to manage much of the runoff at the site. As such, this infrastructure is critical to the stability of the site. CRWD appreciates the additional Stormwater Evaluation included in the revised Feasibility Study to address some of our previous recommendations. Unfortunately, an evaluation of the system's performance under intense, large magnitude rainfall events including the 500-year storm event was not completed. Since the performance of potential solutions is being evaluated over a very long time period, we believe this analysis is critical to ensure success of the selected alternative.

3. *Recommendation: Require that Ford obtain a surety bond, the terms of which should be approved by the State, guaranteeing its financial commitment.*

CRWD understands that Ford will be required to monitor and maintain the site in perpetuity. It is uncertain that Ford will exist in perpetuity. CRWD recommends requiring a financial assurance or similar mechanism to protect the public from bearing future costs should Ford cease to exist.

CRWD believes it is critical to incorporate the recommendations detailed above into Alternative 4 to ensure long-term success, reduce the risk of further negative impacts to the Mississippi River, and decrease long-term maintenance costs. If the MPCA will not require Ford to address these concerns with Alternative 4, CRWD recommends that Alternative 6 (full waste removal) be selected as the cleanup plan.

Thank you for including CRWD in the review process for this important study. We hope you strongly consider requiring the recommendations described above and look forward to continued work in addressing the environmental concerns associated with Area C of the Ford property. Please contact Bob Fossum, Deputy Administrator, from our office to discuss further.

Sincerely,

A handwritten signature in cursive script that reads "Joe Collins".

Joe Collins

Board President

cc: CRWD Board of Managers

Andrew Hogg, Water Resource Coordinator, City of St. Paul

Colleen O'Connor Toberman, Friends of the Mississippi River

Bob Fossum, CRWD

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