

February 3, 2026

Ms. Hadianas,

Thank you for the opportunity to learn about and comment on the Revised Feasibility Study for Ford Area C site remediation and Minnesota Pollution Control Agency's recommended course of action.

While I appreciate that risk assessment frameworks are standardized and understand that they cannot account for complex and uncertain futures, the waste site at Ford Area C faces instability and/or uncertainty on many fronts, limiting the likelihood that Alternative 4 will be an adequate long-term solution. First, river environments are, by nature, seasonal, variable and ever-changing, constantly experiencing changes in water level, erosion and deposition. The industrial waste sits a mere 5 feet above the water table on top of sand deposited by the river, in a narrow river gorge cut through limestone and soft sandstone bluffs. Second, climate change has already led to increased frequency of heavy rain events and increased magnitude of heaviest rainfalls in the state, trends which are expected to continue and which will impact river water levels and severity and frequency of floods. Third, a disposition study which considers the removal of Lock and Dam No. 1 is in progress by the U.S. Army Corps of Engineers. If the site in question was not subject to these uncertainties, I might agree that the risks of complete remediation outweigh the benefits and that Alternative 4 appropriately balances risk.

By completing a partial cleanup on a site facing geologic, climatic and adjacent infrastructural uncertainty, it is all but guaranteed that further remediation will be required in the future. Repetitively re-opening Area C for additional remediation will strain public infrastructure, repeat risk to workers (or expose additional workers), drain state resources required to monitor and manage the remediation, extend traffic closures and disruptions and increase the opportunity for contamination due to human error and equipment failure. It is in our best interest to require Ford to clean up their pollution as thoroughly, swiftly and safely as possible.

Reading between the lines at the January 15th meeting, it is my understanding that the only reason MPCA is choosing to not enforce Alternative 6 is due to real or perceived threat of litigation from Ford Motor Company and concern that Alternative 6 would not be defensible should Ford take legal action. I am confident that the State of Minnesota is well-equipped to hold private companies accountable in the court of law for unremediated hazardous waste dump sites.

I urge MPCA to carefully consider the concerns and recommendations submitted by local government units, non-profits, professionals and community members during this public

comment period. While we hope that MPCA will, at minimum, revise Alternative 4 if not enforce Alternative 6, I ask MPCA to consider the following regardless of the recommendation:

- 1) Marginalized communities are disproportionately exposed to pollution and environmental hazards which adversely affect health outcomes. Care must be taken to dispose of any waste removed from this site as safely as possible to ensure the benefits of clean up at Ford Area C do not come at the cost of another communities' well-being. Our public agencies must also ensure that safety standards and protections are met for the well-being of staff involved in the clean-up.
- 2) Riprap is a widely used and accepted substrate to stabilize erosion-prone shorelines but it does not mimic the river's riparian zone or bluff structure. While I understand that Area C is under private ownership by Ford Motor Company and there are limits to what state agencies can require of private landowners, MPCA must carefully consider what it can and will require of Ford to stabilize and restore the site post cleanup. Legitimate alternative methods of site stabilization (of a slope of appropriate angle) paired with restoration of trees and understory are crucial to ensuring this property bordered by City of Saint Paul property to the south and a narrow sliver of Twin Cities Hydro LLC property to the north serves its role as an integral component of the Twin Cities Mississippi River corridor.

Thank you for your time and consideration,
Anneliese Tatham
Saint Paul, MN