



RE: Ford Twin Cities Plant, Area C – Feasibility Study – Remediation

Dear Ms. Hadiaris,

On behalf of Owámniyomni Okhódayapi, a Dakota-led nonprofit in Minneapolis, I write in response to the Minnesota Pollution Control Agency's (MPCA) proposed cleanup plan for Area C of the former Ford Twin Cities Plant. **We respectfully urge the MPCA to select Alternative 6 — removal of all wastes, and site restoration as the final remedy.**

Owámniyomni Okhódayapi is leading the restoration of a five-acre site at Owámniyomni (St. Anthony Falls), adjacent to the Upper Lock on Ĥaĥa Wakpá (Mississippi River) in Minneapolis, along with three additional acres managed by the Minneapolis Park and Recreation Board. The site at Owámniyomni and the entire Mississippi River is a place of deep cultural, spiritual and ecological significance for the Dakota people. However, through industrialization and commercialization, much of the original land was destroyed. We are restoring this sacred place for ecological renewal, cultural education, healing and reconnection. Allowing hazardous industrial waste to remain in or near this landscape undermines Dakota people's fundamental understanding of our relationship with the land as kin.

While we appreciate that the MPCA has taken steps toward cleanup and has proposed Alternative 4 as an improvement over Ford Motor Company's preferred Alternative 3, we are deeply concerned that Alternative 4 may still leave significant volumes of contaminated material in place. A remedy that relies on partial removal, stabilization and long-term containment does not adequately protect the environment, public health or culturally significant lands. In contrast, **Alternative 6 is the only option that fully removes the waste and restores the site, addressing the root cause of contamination rather than managing its continued presence.**

As climate-driven flooding becomes more frequent and severe, leaving hazardous waste in place poses increasing risks to the Mississippi River and surrounding areas, including at Owámniyomni. Complete removal offers the most durable and protective solution in the face of these changing conditions, ensuring the health and strength of the River for generations to come.

Selecting Alternative 6 is also a critical environmental justice decision. The MPCA has publicly committed to addressing inequities in pollution exposure and ensuring fair treatment and meaningful involvement for Black, Indigenous, communities of color and low-income residents. Dakota people have endured disproportionate harm from industrialization and commercialization along the River. Choosing a remedy that leaves

toxic materials behind perpetuates these historic injustices. Selecting Alternative 6 would demonstrate the MPCA's commitment to listen to Indigenous voices and act in alignment with its environmental justice mission.

Although Alternative 6 carries a higher upfront cost, it is the most fiscally responsible option over the long term. Partial remedies shift risk and potential future cleanup costs to taxpayers and future generations, particularly as environmental conditions change – a burden they should not have to carry. The extensive and long-standing damage to Area C requires an equally comprehensive solution.

For these reasons, Owámniyomni Okhódayapi respectfully urges the MPCA to adopt Alternative 6 as the final cleanup plan for Area C and to require full funding and accountability for cleanup and restoration. We also encourage the agency to continue meaningful consultation with Dakota Nations, ensuring that cultural values, ecological integrity and public safety guide decision-making at every stage.

Thank you for the opportunity to comment on this important issue and for considering a path forward that fully restores the land, protects the River and honors Dakota homelands.

Pidámayaye ye (thank you in Dakota),



Shelley Buck

President

Owámniyomni Okhódayapi