

Brett Smith

I support Option 7, Full Cleanup. All of the other options leave industrial and potentially hazardous waste in the ground beneath the river. These options are unacceptable for the protection of a river as economically, recreationally, historically, and culturally as important as the Mississippi. This is a blot on our history and reputation as a state that cares. We should not leave garbage under the river. Period.

Your estimates of the risks and costs of the various options are questionable. First the estimate of cost was essentially done by a contractor hired by Ford as I understand it. Given the history of corporate overestimation of the costs of various safety or other environmentally protective measures, it is hard to believe they are not gross overstatements. Before making the choice of another option, I urge you to take another look at those costs. I see no reason to believe they are not inflated to make the cleanup too expensive.

Regrading the costs of cleanup to Ford, I also urge you to take into account the profits that the corporation and its stockholders have made because of their failure to take cleanup action prior to now. Given the value of dollars earned over the past many years in today's dollars, given the power of compounding, the benefit to the company has been huge. It dwarfs to cost of the cleanup now.

Your estimate of risks is also questionable. Given our lack of knowledge about the human and environmental effects of chemicals, your estimate should have had a large margin of uncertainty. Also, it is my understanding that you did not fully take into account the changing picture with respect to flooding given the new climate impacts. When looking at a future as uncertain as we now face, with respect to human and environmental risks from chemicals buried under a river it would be wise to take the cautions and careful approach and completely remove the threats. You defend your choice by a seemingly arbitrary comparison of risks, measured in environmental and human impacts with costs, measured in dollars. This is an unacceptable approach.

Finally, I believe your approach to the cleanup is too limited in its scope. As a state agency you should be looking at creative ideas to improve the state's environmental quality. Perhaps, by your calculation, you cannot force Ford to do a full cleanup. I disagree with your calculations and ask why did you not consider the broader value of a totally cleaned up site. The potential for recreational, cultural, and educational value of a clean river should have been a part of your thinking and calculations. You failed on this count.

Finally, I note, as others have, that this ground and water is the historic home of the indigenous communities which still live in the area and enjoy and utilize the river as they have for centuries. You also fail on this count.

I strongly urge you to choose the full cleanup option. Thank you for the opportunity to comment.