

Mike Harley

February 2, 2026

To the Minnesota Pollution Control Agency:

I am a resident of Saint Paul, and live only a little more than a mile upriver from Ford's Area C. I am also a member of Lumen Christi Catholic Community, located in Highland Village, and my comments support and amplify those submitted by our faith community's social justice committee. The river is the defining natural asset of our community and we have seen strong interest from many people in the fate of Area C.

I urge MPCA to select Alternative 6, which provides for a full cleanup of Area C. This is the only alternative that requires Ford to fully address the harm done to the river, the floodplain, and to the community. Only this alternative allows us to put the legacy of this pollution behind us and restore this precious land along the Mississippi River.

The decision to select Alternative 6 would be the only path that adequately considers climate change, future use of the site, and stabilization of the site's slopes. Both the MPCA's proposed selection of Alternative 4 and Ford's preference for Alternative 3 assess risk inadequately for the following reasons:

- Analysis of flood risk considered 100-year floods, and therefore failed to account for the reality of climate change and the increased likelihood of 500- and 1000-year floods on the site.
- Your staff's comments at the January 15 public meeting made it clear that no consideration was given for the possibility of land use changes in the near future that would require more stringent cleanup than that required to meet industrial standards. Specifically, the possibility of dam removal would impact the site and its potential uses.
- Alternative 4 would leave steep slopes that the Capitol Region Watershed District and other commenters have identified as a risk for potential instability and increased hazardous waste exposure. This instability would be greatest on the south side where hazardous waste is more likely to be exposed, increasing the risk to the Mississippi River and the public.

Given these risks and uncertainties about the future, the interests of Minnesotans would be best served by requiring Ford to clean up the site fully now, while the company has adequate resources to cover costs. However, if Alternative 4 is selected, I urge MPCA to require Ford to provide financial assurance for future cleanup funds. MPCA has asserted that it lacks authority to require financial assurance from Ford for future risks. This interpretation warrants independent legal review, including consultation with the Minnesota Attorney General's Office.

I appreciate the work of MPCA staff in considering cleanup options for Area C. At the same time, I ask MPCA to reconsider its support for Alternative 4 and instead choose Alternative 6. I know that MPCA is seeing this request repeated in comments from many individuals and organizations in our community, and I know that our elected officials in the neighborhood support a full cleanup. This call to reconsider MPCA's decision in light of risks that have been overlooked or underestimated comes from a community united in seeing the opportunity that comes with full cleanup. Only with Alternative 6, the land now called Area C will be restored to the environmental, community, and economic asset that it deserves to be.

Respectfully submitted,
Mike Harley