

Saint Paul City Council Ward 3 (Saura Jost)

See attached letter for comments.

MPCA Colleagues,

My name is Saura Jost, and I serve as the Ward 3 Councilmember for the City of Saint Paul. Ford's Area C falls within my jurisdiction. I represent the Ward, but more importantly, I represent the people who live alongside this site. I approach this matter as a neighbor, as an elected representative of my community, and as a structural engineer*.

It is my strong preference that the Ford Motor Company and the MPCA move toward **Alternative 6: full remediation of Area C**. While I understand this option is significantly more intensive and costly than the recommended Alternative 4, I believe that full excavation and removal of hazardous waste is in the long-term best interest of both Ford and the surrounding community. This approach offers the greatest assurance to residents here and downstream and relieves Ford of ongoing liabilities tied to a site that no longer serves their operations. It also provides the most potential for future use of this land.

My rationale for supporting a more substantial cleanup is grounded in five key considerations:

1. Subsurface Hazardous Waste and Flooding Risks

Hazardous materials—including paint waste, solvents, and heavy metal, remain buried at depth. Increasingly frequent flood events, including those that exceed the 100-year flood, infiltrate this, potentially mobilizing contaminants and increasing the risk of groundwater or surface-water impacts. With climate change driving more severe and frequent flooding, complete removal of contaminated materials is the only option that fully eliminates this recurring hazard.

2. Site Stability, Slope Integrity, and Geotechnical Concerns

Major flood events including those beyond the 100-year flood pose significant risks to slope stability and the overall integrity of the site. Even if contaminants appear relatively inert today, substantial shifts in the landscape could alter those conditions dramatically. These geotechnical considerations have not yet been evaluated, but they are essential for determining cleanup strategy, long-term site feasibility, and land use.

3. Flexibility for Future Land Use

If the site is to serve any purpose beyond functioning as a basic parking lot, deeper remediation is essential. A more comprehensive cleanup increases safety and preserves flexibility so that future generations are not constrained by today's limitations.

4. Ecological and Environmental Exposure

Risk is not limited to human exposure pathways. Ecological receptors, plants, animals, and sensitive habitats, could be impacted, especially given proximity to Hidden Falls Park. While it is implied this has been addressed in the analysis by Arcadis, further analysis is needed to understand the implications of each option for threatened and endangered species, ecological pathways, and adjacent natural resources. This is important for understanding the impact to Hidden Falls Regional Park. Impacts on the nearby river, a federally owned resource, must also be taken seriously, especially after recent flood events.

5. Cost and Uncertainty of Ongoing Monitoring and Targeted Removal

Containment-based strategies require indefinite monitoring, ongoing maintenance, and an enduring level of uncertainty. They also leave open the possibility of future remediation if new issues emerge through continued monitoring and testing. Moreover, selectively excavating only portions of the contaminated material risks uncovering additional hazards once those areas are disturbed, potentially triggering further corrective action. A comprehensive cleanup minimizes these long-term financial, environmental, and operational liabilities by addressing the contamination at its source.

Given these considerations—and with Alternatives 3, 4, and 6 being the only ones meeting minimum standards—I strongly urge the MPCA to select **Alternative 6**. Alternatives 3 and 4 focus on controlling and monitoring the waste rather than eliminating it, while Alternative 6 addresses the root of the problem. **Elimination, not containment, is the only path that fully protects the community, the environment, and the future of this site.**

Thank you for your thoughtful consideration and for your continued commitment to the health and safety of our community.

Sincerely,



Saura Jost

Saint Paul City Councilmember – Ward 3

*Environmental evaluations are not part of my expertise, and my opinion should not be considered professional engineering advice