

Lucy Heegaard

My husband and I will soon be among the nearest neighbors to Area C. By summer of 2026, when we move into our new home in Highland Bridge, we will be directly across the street from the toxic waste dump. We are already able to see from our future bedroom window the tall lights atop the parking lot that caps the waste pile.

We have been tracking the Area C problem since we made the decision to buy a lot in Highland Bridge and build a single family home along the river. We strongly advocate for Alternative 6, full removal of all toxic waste. This is the only solution that allows for the possibility of future use of the land so that it will be unrestricted by environmental covenants and could be traversed safely by the general public in the future.

In addition, Alternative 6 seems the most realistic of all the options in terms of cost. Every other option requires long-term monitoring in addition to restrictive covenants. Long-term monitoring under these plans is termed as 30 years. But in truth, as long as toxic waste remains under the soil, monitoring will need to continue. So the costs estimated for all options except Alternative 6 are significantly underestimated since they do not provide reserve funds to support regular maintenance and monitoring in perpetuity. Further, they do not have adequate provisions to hold Ford Motor Company responsible for even the 30-year time horizon of costs if those costs have been underestimated by Arcadis, which in all likelihood they have been. The report has been under preparation for so long that it is hard to determine if the costs estimates are accurate to the actual time of release of the report rather than several years ago when the report was first scheduled to be released.

Thus, while Alternative 6 seems far and away more expensive than the others, it is our opinion that it will be not only the most cost effective option because it will handle all costs upfront and forgo the need to fund long term maintenance and monitoring, it will also prevent a future quagmire of responsibility. There could likely be a lot of finger pointing and dodging of responsibilities if, for instance, the Army Corps of Engineers makes changes to Lock and Dam 1 after only a small remediation is done at Area C. The whole playing field could change for the toxic waste that remains and the responsible parties could use the changed circumstances to argue that they are no longer responsible. Even MPCA itself could become culpable in such a situation with the question arising of whether the agency adequately safeguarded public health and environmental well being when the Area C remediation choice was made.

Or, environmental issues could come to bear that have not yet been predicted by current monitoring. For instance, the monitoring wells that provide information on what to expect in terms of toxic waste leach in response to river flooding are based only on 10-year flooding events, not a 100-year event. Based on the monitoring done for the plan, we have no way of adequately predicting what the potential toxic impact would be on the river and soils if and when we experience a 100-year flood event. This is just one of many short sighted aspects of the plan we have before us.

All this being said, these are simply some of the numerous concerns that arise for my spouse and me as we think about the possibility of leaving toxic waste behind at Area C. In addition to the concerns we've outlined, we would also like to stand 100% behind the February 2, 2026 letter

written by Colleen O'Connor Toberman, Land Use & Planning Director for Friends of the Mississippi River. Toberman has outlined far more issues than are within our capacity to document and enumerate. We'd like you to consider her letter and the concerns she has outlined and documented as appended to our comment.

Thank you.