



February 3, 2026

Amy Hadiaris
Minnesota Pollution Control Agency
520 Lafayette Road North
St Paul, MN 55155

Re: Comments on the Focused Feasibility Study for Area C from Ford Motor Company

Dear Ms. Hadiaris:

On behalf of the National Parks Conservation Association (NPCA), we thank you for the opportunity to comment on the “Focused Feasibility Study for Area C” submitted to the Minnesota Pollution Control Agency (MPCA) by Ford Motor Company and Arcadis.

NPCA is the independent, nonpartisan voice working to strengthen and protect America's national parks. Founded in 1919, NPCA works with its 1.9 million members and supporters nationwide, including over 25,000 in Minnesota, to protect and preserve our nation's natural, cultural, and historic heritage for present and future generations. NPCA is headquartered in Washington, D.C. and has 27 local and regional offices across the country, including a field office in Minnesota.

Significance of Study Area

Ford Area C lies within the Mississippi National River and Recreation Area (MNRRA), a 72-mile corridor of the river that is a unit of the national park system. Ford and the MPCA must consider the significance of this protected, nationally recognized ecological resource when contemplating the appropriate future of the hazardous waste pile. These are the resources Congress explicitly directed the National Park Service (NPS) to preserve, protect and enhance for the benefit of the American people (Public Law 100-696, Section 701(a), 102 Stat. 4599, Nov. 18, 1988).

The State of Minnesota also designated the same 72-miles of the river as the Mississippi River Corridor Critical Area (MRCCA). By state law, Critical Areas are those “containing or having a

significant impact upon historical, natural, scientific, or cultural resources of regional or statewide importance” (Section 116G.05).

Both NPS and MRCCA designations require a higher level of consideration, review and protection than most other reaches of the Mississippi River.

Potential for River Restoration Being Studied

We have a once-in-a-lifetime opportunity to reimagine the future of the Mississippi River and our national park in the Twin Cities. The Army Corps of Engineers is studying the future of Lower St. Anthony Falls Lock and Dam and Lock and Dam 1. Both no longer serve their original navigational purpose, and the Army Corps is conducting a disposition study to determine what to do with these structures. This includes considering lock and dam removal, modification or other future use opportunities. Now that the Army Corps has full study funding, it is expected to be completed in 2027.

Two additional studies funded by Minnesota’s Environment and Natural Resources Trust Fund are also pending. The University of Minnesota St. Anthony Falls Lab is studying sediment transport in the gorge under a variety of future conditions. This study will be completed in 2027. Friends of the Mississippi River plans to begin a dam removal feasibility study in 2026 that will be completed in 2028. This study is designed to complement and supplement the Corps and university studies.

Finally, NPCA is planning to release an economic benefits analysis of dam removal later this year. This study will consider current recreational uses and comparable urban river communities to help us understand the potential economic benefits of ecosystem restoration and expanded river access due to dam removal. Initial results of this analysis suggest that the 8-mile stretch of the river in the Twin Cities known as the Gorge will see hundreds of thousands of new visitors if Lock and Dam No. 1 is removed due to expanded recreational access and uses. This includes visitation at Hidden Falls Regional Park, on the backside of Area C, and at Crosby Farm Regional Park, just downstream of Area C where MNRRRA is also planning for a new headquarters and interpretive center.

All of these studies will be presented to decision-makers within the next three years so that Congress can make an informed decision about the future of the locks and dams. Given this critical discussion and potential for river restoration in the Twin Cities, MPCA should select an alternative that meets the highest standard of clean up and ensures a healthy and accessible river for future generations.

NPCA Urges MPCA to Select Alternative 6

We recommend that MPCA select Alternative 6, Removal of All Wastes and Site Restoration. Alternative 6 would be most protective of human health and the environment. Excavation and disposal of all hazardous waste materials and debris will eliminate the potential for future

exposure, as well as eliminate the risk of needing public funds for future cleanup. This Alternative will also ensure that no matter the outcome of the lock and dam studies, concerns related to the health and safety of this site are not a factor when determining the future use of this river corridor. However, if anything other than Alternative 6 is selected for implementation, the MPCA must seek the strongest possible measures to ensure that Ford continues to be financially responsible for future remediation.

We thank you for the opportunity to submit comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "C. Goepfert", is positioned above the printed name.

Christine Goepfert
Midwest Campaign Director