



*Working to protect the Mississippi River  
and its watershed in the Twin Cities area.*

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July 6, 2020

Tony Barranco, Ryan Companies  
John Marshall, Xcel Energy  
Melanie McMahon, City of St. Paul  
Menaka Mohan, City of St. Paul  
Jim Pearson, Xcel Energy  
Chuck Pinter, Ford Motor Company

Dear Ford redevelopment leaders:

We are writing to share our concerns about the timing of the proposed solar array installation at Ford Area C.

Friends of the Mississippi River (FMR) is a non-profit organization with a mission to engage community members and other stakeholders to protect, restore and enhance the Mississippi River and its watershed in the Twin Cities Region. We represent thousands of people in the metropolitan area who care deeply about the river, including a growing membership of over 2,700 people and more than 3,200 volunteers and 2,000 advocates engaged each year.

As you know, FMR has been largely supportive of the Ford site redevelopment plan. We support dense development that will create a vibrant new riverfront neighborhood. And the goal of powering it with renewable energy is laudable.

We also agree that the creation of new renewable energy sources is crucial to our community's future. In this case, however, we are concerned that the proposed timeline for this relatively small solar array may impair the ability to cleanup a longstanding hazardous waste dumpsite on the Mississippi River floodplain.

We encourage all of you, as project leaders, to review this information and coordinate the solar project timeline to better align with other important processes at Area C.

### **Feasibility study timing**

The Minnesota Pollution Control Agency (MPCA) is preparing to undertake a feasibility study to examine remediation options for ongoing hazards at Area C. This study will explore a range of remediation strategies, up to and including full removal of the waste pile.

Before the study can begin, Ford must install two additional monitoring wells agreed to earlier this year. These wells were originally slated for a spring 2020 installation, but Ford has requested a delay to later this summer. These wells will be placed to capture more information about what happens during floods when the river inundates the pile above the level of the hazardous waste.

The MPCA has stated that they will require data from these new wells during at least two flood cycles before proceeding with the feasibility study. It's impossible to predict how long it will take to gather that data; 2019 saw multiple periods of high water but the river hasn't experienced significant flooding yet in 2020.

After the two or more flood cycles occur, Ford must submit its monitoring reports to the MPCA for review. It has typically taken a few months for the MPCA to receive Ford's monitoring reports. Only after that can the feasibility study process begin; the process includes a draft report, public comment period, and report approval process. This process will take months, if not years.

### **Potential for smaller cap area**

The MPCA has already indicated that they will require at least some mitigation of environmental risks at Area C, including stabilizing the south slope of the pile where erosion has brought hazardous waste near the surface.

Because the toe of this slope is already at the property's boundary line with Hidden Falls Park, erosion mitigation may require reducing the slope grade by reducing the size of the concrete cap. This would reduce the surface area available for a solar array. It's not clear whether this scenario has been included in solar project planning.

Of course, the MPCA's feasibility study could determine that more substantial mitigation of the site is required, up to and including full removal of the entire waste pile.

### **Cost of remediation**

Should the solar array be installed before the feasibility study is complete, the need to temporarily or permanently remove some or all of the solar array could limit cleanup of Area C. Because cost is a "balancing criteria" in the feasibility study process, costs related to the solar array could affect decision-making about remediation. The presence of the solar array could even lead the MPCA to select a cleanup option that might be less comprehensive than would otherwise be selected.

The community deserves a full cleanup of the Area C waste pile. The city has called for the site's conversion into parkland in both the Great River Passage Master Plan and the Hidden Falls-Crosby Farm Regional Park Master Plan. Before a solar array is installed, these conflicting visions and project timelines for the site need fuller consideration.

We are requesting that you coordinate timelines so that solar is not installed at Area C before a feasibility study is completed and the remediation plan is in place. Should the solar project proceed ahead of the MPCA's process, we'd like to see reassurance that costs related to removing all/part the solar array, should that become necessary, will not be included in feasibility study cost considerations.

We're happy to discuss these concerns in more depth at any time. Thank you for your consideration.

In partnership,

A handwritten signature in black ink, appearing to read "Whitney L. Clark". The signature is fluid and cursive, with the first name being the most prominent.

Whitney L. Clark  
Executive Director

CC:

Amy Hadiaris, Minneapolis Pollution Control Agency  
Rep. Dave Pinto, Minnesota District 64B  
Russ Stark, City of St. Paul  
Councilmember Chris Tolbert, Ward 3, City of St. Paul