

Please provide your contact information. This information and your comments will be publicly available.

Name: Susu Jeffery
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Please share your comments on the Line 3 Project Draft EIS. What could be improved in the EIS? What is missing?

Where is the "No build" alternative?
 That specific language is important

0696-1

~~///~~
 Also missing is ^{are} the numerical
 threat(s) of cancers expected
 with Line 3 construction.

0696-2



Comment Form

Line 3 Project Draft EIS Public Meeting

Please provide your contact information. This information and your comments will be publicly available.

Name: Kelley Jewett
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Please share your comments on the Line 3 Project Draft EIS. What could be improved in the EIS? What is missing?

0697-1

The EIS is missing information about the impact of the low income rural people who would be directly affected by Line 3. My ancestors immigrated to Atkin County 125 years ago and my family has lived there since, living off what we fished, hunted, trapped and raised on our farm. Line 3 would go through areas with some of the highest levels of poverty in MN, promising people jobs. Where will those jobs be after the pipeline is built? How will the area residents feed their families if the wetlands that feed the rivers and lakes are so damaged that the fish do not survive? How will the area residents get clean water to drink if ^(when) the pipeline leaks, either with big leaks or microleaks that often go undetected for long periods of time. What will farmers do if their lands are affected by the pipeline, which affects their crops, their livestock and their livelihoods?

The EIS does not address the human health consequences of oil spills and the chemicals that oil workers are exposed to in the building and maintenance of tar sands pipelines.

Who will pay the 276 billion \$ price that the EIS has determined will be the social costs of this project?

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MS. DEANNA JOHNSON:

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D-E-A-N-N-A, J-O-H-N-S-O-N.

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My comment is kind of based on questions, and there's nobody here to answer questions. So it kind of complicated it a little bit.

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I want to know what the approximate percentage of the DEIS is developed from information provided by Enbridge, Cardinal, and BAR Engineering. Is anybody able to answer that question for me?

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FACILITATOR: During this comment period, it's only comments, but we're taking them closely, and there are folks afterwards that you may be able to informally ask as well.

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MS. DEANNA JOHNSON: What are Cardinal and BAR Engineer's previous connections to Enbridge? Was there an independent review of their work? What is the nature of participation in the development of this document by the Minnesota Pollution

0851-1

0851-2

Control Agency and the Minnesota DNR?

This document bears no resemblance to their work on such issues in the past. Itasca State Park and Mississippi headwaters are given little attention in this EIS.

Itasca Park is not listed as a Minnesota historic resource in the document. What entity made the decision to not list Itasca as historically significant, despite the fact that it is Minnesota's oldest state park established in 1891.

It's a source of one of the world's largest rivers. It has a bison kill site, which is 8,000 years old, and the area hosts prehistoric site from early native American Elk Lake culture.

Given that the Upper Mississippi River Monitoring and Assessment Study by the MPCA, in January 2017, found the Mississippi headwaters to be a largely healthy river in its northern reaches, and the river is in great shape, and the study states, "The headwaters are an exceptional resource that should be protected."

1 Why is there no assessment of
2 the upper Mississippi watershed in the DEIS?

3 What entity made the choice of
4 which watersheds would be evaluated? What
5 entity made the decision to list the
6 Mississippi waterway crossing near the
7 headwaters as impaired water?

8 This is found on table G2,
9 page 21. Where was the information found? It
10 is not listed on the 2016 list of impaired
11 waters.

12 I find it very disturbing that
13 Enbridge, BAR Engineering, and Cardinal are
14 driving the information provided in this
15 document. How would we as citizens expect
16 these entities will have our natural resources
17 and our local economy as a priority, as this
18 document is prepared? Where is there evidence
19 provided that unbiased evaluation of their
20 work is provided?

21 Both of these companies have
22 worked for Enbridge in the past, and both have
23 provided remediation services to Enbridge,
24 which, if they're assisting with the
25 preparation of the DEIS, and they have had --

1 do work for remediation, they could also find
2 more work if there's a leak or a spill into
3 our resources after it's all said and done.

4 Would both these -- I guess I'm
5 going to repeat this. Would both these
6 companies quite possibly be hired in the event
7 of a rupture, spill, or leaks to assist
8 Enbridge if the pipeline were constructed?

9 It is absolutely unconscionable
10 that the MPCA and the DNR agencies, who
11 protect Minnesota's environment, are
12 apparently pushed aside in the major
13 development of this document.

14 Instead, Enbridge, Cardinal, and
15 BAR are heavily involved in providing
16 information for this document; corporations
17 who come to the table with prospects of huge
18 financial gains.

Levi, Andrew (COMM)

From: nanakay@unitelc.com
Sent: Monday, July 10, 2017 12:46 PM
To: MN_COMM_Pipeline Comments
Subject: Comment Line 3 Project- (CN-14-916 and PPL -15-137)
Attachments: Line 3 Comment.rtf



Virus-free. www.avast.com

I submitted this comment on Friday July , 7, but realize I forgot to include docket numbers so am resubmitting.

July 7, 2017

Jamie MacAlister, Environmental Review Manager

Minnesota Department of Commerce

85 7th Place East, Suite 280

St. Paul, MN 55101-2198

email address: Pipeline.Comments@state.mn.us

PUBLIC COMMENT ON LINE 3 PROJECT (CN -14-916 and PPL-15-137)

Dear MS. MacAlister:

I write to provide comment on the Enbridge Line 3 Replacement DEIS. This proposed project is of potential great consequence to Minnesota's environment and to our citizens.

In part, the Appeals Court decision states, "In this case, the completion of an EIS at the CN stage satisfies the imperative identified by ensuring decision makers are fully informed regarding the environmental consequences of the pipeline, before determining whether there is a need for it." Does the information provided in the preparation of this DEIS support an unbiased, environmental assessment of the Proposed Project the PUC requires to make their decision or does the information primarily back up the ultimate goal of the company to obtain the CN and Route Permit for the Proposed Project?

2375-1

After the Appeals Court decision to order an EIS for the Enbridge Project, it was hoped that a comprehensive and unbiased EIS would be produced. The discussion of the possibility of having the the DOC, MPCA and the DNR work as equal partners in the development of the EIS spoke to good intentions during the beginning discussions of how to proceed with the EIS. But, the DOC advocated to take the lead role with the MPCA and DNR being assisting agencies the DOC would direct. In the PUC Jan. 11, 2016 order, this is unfortunately the plan that emerged. The DOC stated it would enter into an agreement with the MPCA and DNR to ensure completion of an EIS that fulfils the legal requirements set

2375-2

forth in the Environmental Policy Act, but did that happen? After that point, the EIS process appeared to move forward with a document that would largely speak to Enbridge's stated goals for this project and often what I would consider deceptively speak to environmental concerns. Does the methodology follow CEA statutes rather than EIS Law? It appears so as I look at the document.

2375-2
Cont'd

Chapter 13 of the DEIS is the list of preparers. It states that the DOC is the lead agency and the MPCA and DNR acted as assisting agencies throughout the process, but no information on the extent of assistance they were able to provide. On Feb. 12, 2016, The DOC (Lead Agency) in an Memorandum of Understanding stated, "Lead Agency will enter into a separate arrangement with the project proposer to cover the cost of environmental review for proposed project. Costs assessed to project proposer shall include the costs necessary to reimburse the assisting agencies for all costs incurred by assisting agencies in accomplishing purpose of the MOU." Did the DOC ever follow through with this and if so, how much did Enbridge pay for assistance from the MPCA and DNR? Or, did Enbridge to the largest extent use Cardno's information in addition to information provided by Barr Engineering or other Enbridge affiliates in this process?

2375-3

Chapter 13 goes on to state, "DOC-EERA supported by Cardno, INC in preparing EIS. Cardno's team included project management, a range of resource specialists, technical writers, and geographic information system analysts." So, Yes, the process was largely given over to Enbridge and Cardno to provide the the information for completion of this document. The role of the MPCA and DNR was left, I believe, intentionally vague. The document bears no resemblance to work the MPCA and DNR have completed on the pipeline cooridor in the past. The voice of our state's environmental guardians, the MPCA and DNR, is not evident in this document, instead replaced by Enbridge and Cardno, both corporations who would gain financially from this project. What percentage of this document did the MPCA and DNR work on and what percentage was done by Enbridge, Cardno and Enbridge affiliates?

The DEIS Executive Summary on page ES-3 under Question, " Who prepared the EIS", The Summary states, "The Commission has ordered an EIS for the CN and route permit applications to be prepared by the MN DOC-EERA in consultation with Commission's Executive Secretary and with assistance of MN DNR and MNPCA." There is no mention here of Cardno in preparing the EIS. A citizen relying on the Executive Summary for information would be left with the impression the EIS was prepared by the aforementioned state staff. They would not be informed of Cardno's influence in this process. I believe this is deceptive.

Cardno is a company that assists in remediation after oil spills. The New York Times, Oct. 7, 2011, article, "Pipeline Review Faced with Questions of Conflict", by Elizabeth Rosenthal and Dan Frosch, reports that Cardno had a relationship with Enbridge in the Kalamazoo clean up. The article quotes Oliver. A. Houck, a law professor at Tulane University and an expert on NEPA as saying, "Cardno Entrix should never have been selected on the Keystone XL because of its relationship with TransCanada and the potential to garner more work involving the pipeline. The company provides a wide range of services assisting in oil spill response. Cardno Entrix had a "financial interest" in the outcome of the project. " Mr. Houck added, "Their primary loyalty is getting this project through, in a way the client wants." The article reports that the impact report completed by Cardno for the Keystone XL project indicated that, "

response to a spill from the proposed pipeline would not require unique cleanup procedures." We know from the National Academy of Science Dilbit Study that tar sands clean up is unique and much more difficult, especially in water environment. The New York Times article reports that the Enbridge Kalamazoo spill was only mentioned briefly in the addendums, and, Cardno Entrix would have been aware of the challenges in Michigan; it was hired by Enbridge to assess the damage to natural resources caused by the spill." So, why would Cardno have a buy in to produce the best product in a comprehensive and honest EIS for Line 3, when they could turn around and cash in if there were an oil spill here? Afterall, they have experience working with Enbridge on the Kalamazoo spill remediation.

Barr Engineering worked with Enbridge on the original corridor plan for the Sandpiper route, which is now planned to be used by Line 3? We know Barr was involved in the analysis. In an article by MPR News, "Critics Object to Pumping Oil Through Minnesota Lake Country" by Dan Kraker, Enbridge project Director, Paul Eberth, states, "The company worked hard to avoid lakes in designing the pipeline route. According to an analysis conducted by Barr Engineering, only 3% of the lakes in the watersheds that we cross have a hydrological connection to the pipeline." With regard to Barr Engineering, should we trust their input for environmental analysis of the Sandpiper corridor which will be the same corridor used for Line 3. Barr's website states, "Barr has worked with Enbridge and other Enbridge affiliates on nearly 300 projects, assisting with mainline expansion efforts as well as general operations. Our work with Enbridge ranges from environmental compliance assistance to project engineering support, from wetland mitigation and restoration to site assessment and remediation." On Barr's web site, there is a quote from Kristen Benson, Sr. Environmental Analyst, Enbridge Energy Partners, "If I get notice of an incident, I contact Barr directly and often they beat me to the site. Leak sites can be out in the middle of nowhere, but they will go out ...and fill in where needed. They are dedicated to our company." So we know from this quote that Barr is dedicated to Enbridge, but what does that mean for their trustworthiness in assessing the environmental concerns this route would mean to our pristine environment? We also know from this quote Enbridge calls on them to deal with spills and the quote refers to their work in the middle of nowhere with a picture on the page of this quote of an area that looks like the Mississippi River near the Headwaters, where they want to lay this pipe. So, Barr, who was heavily involved in the original corridor design, would likely be able to gain financially if there were a spill.

There is plenty of evidence in the DEIS, that suggests in my opinion that the document sways in favor of the Project Proposers goals, by leaving out information, and providing evaluations that do not appear to be unbiased including these examples and I have emphasized Itasca State Park:

1) Most of the information on the technical report regarding accidental releases are non-public. "Worse case spills" volumes are protected information in the DEIS. There is also no third party analysis. Citizen's have been told the effects of leaks, spills and yes - catastrophic spills are none of our business. Yet, the ramifications of such incidents would be devastating to our water resources and our economy. It is not compliant with MEPA Law to deny citizen input on this most important topic. I could not find an economic cost analysis of an oil spill. Is there one?

There is potential for conflict of interest in the spill analysis. Contractors were hired by Enbridge.

Stantic completed the 7 site spill analysis for the DEIS. Benign locations were used. They used, "representative" release locations in their assessment to serve as proxy for other similar sites, without actually specifically evaluating other locations along the preferred route or alternative routes. Citizens are then expected to use a table to look for an example to represent a particular water body they are concerned about. How can this assessment be considered to be valid and how can a citizen be expected to use the information and comment on it? Stantec has a very significant work history and involvement with Enbridge. Stantec is involved in the Enbridge Alabasca Project, The Enbridge Energy Southern Access Pipeline and a Stantec Website sites it's relationship with Enbridge. On the website under "View our Work- Enbridge Integrity Team", the website indicates that around 2012, Cimarron Engineering was acquired by Stantec, so with the addition of Edmonton offices and new skill sets in the Stantec Integrity Team, the program support role was created and Stantec resources became more embedded within the Enbridge team structure.

Now, in Enbridge's Revision Requests for the DEIS, they wish to go farther in this denial of citizen's rights for concerns regarding spills. In Enbridge's revision request, Chapter 10-1-8,, they ask that the DEIS eliminate the term, "catastrophic" to describe spills. In the revision request they state, "catastrophic is not a description of relative volume, but rather imports an emotional component. A descriptor more closely tied to volume, such as "very large" should be used in place of catastrophic." In terms of what a major rupture or a spill such as happened at Kalamazoo, in our Headwaters, our pristine lake country or our wild rice lakes and streams, the term "very large" does not aptly describe such an event and Enbridge hopes to by using this term to delegitimize public sentiment with regard to our intrinsic and valuable resources. But, at the same time, they are keeping accidental release information non-public, so the public has no information on actual volume for such spills.

2) There is very scant information in the document regarding Itasca State Park. Why was our state's crown jewel state park given little attention in the discussion? In the DEIS, the Natural Resource and Water Summary Tables and Figures indicate the Proposed Project centerline would cross Mississippi River three times, twice in the area of the Headwaters and LaSalle Creek would be crossed by the centerline one time. Line 3 would be laid at the east boundary of Itasca. Itasca receives over a half million tourists per year and is a site of international importance, with visitors from all over the country and the globe visiting our park. It is also of great significance to Minnesotans. The pipeline crossing the Mississippi two times in the Headwaters area and LaSalle one time, puts the park in peril and a spill in the Headwaters would be **catastrophic**! But, Enbridge wishes to proceed with the plan for this pipeline by pretending Itasca State Park almost doesn't exist.

2375-4

3) The Mississippi River at the Headwaters where the pipeline would cross was listed as impaired waters in the document. This is found on Table G-2, page 21. Impairment would be due to naturally occurring oxygen levels caused by marsh and wetlands in the area. " Our Upper Mississippi River Monitoring and Assessment Study" by the MPCA in January 2017, "found the Mississippi Headwaters to be a largely healthy river in it's northern reaches and that the river is in great shape and the study states the Headwaters are an exceptional resource that should be protected." Is this assessment of the river included in the DEIS?

2375-5

3) There is no evaluation of the Upper Mississippi Watershed in the DEIS, despite the fact that this is a high consequence area due to it's pristine nature, inaccessibility if there are oil releases, and very high volume of tourism due to Itasca State Park, .

2375-6

4) There is no mention of Itasca State Park as being a Historic Resource. Though the pipeline borders Itasca State Park, Minnesota's Oldest Park established in 1891, and crosses the Mississippi two times in the Headwaters area and crosses at LaSalle which is home to the prehistoric site of early Native American Elk Lake Culture, this information is not brought out in the DEIS. Itasca was established to preserve the Headwaters of the Mississippi River. The entire park and an individual archaeological site are on the National Register of Historic Places. Itasca was designated a National Natural Landmark by the National Park Service under the Historic Sites Act. This program recognizes and encourages the conservation of outstanding examples of the natural history of the United States.

2375-7

Again, we see in Enbridge's revision request minimization of the value of the Headwaters area. The original text of the DEIS Chapter 5 page 585 reads in part, "Surveys were not completed for historic resources in Minnesota." I ask, "Why not?" Enbridge enlarges on this issue in it's revision suggestion. It reads, "Enbridge recently completed historic structures surveys and will submit the final to the DOC when complete. Revise the statement to clarify that historic structures surveys have been completed and results and recommendations are forthcoming." So here Enbridge is conveniently only referring to structures and not mentioning natural sites which are of historic significance. The entire park (Itasca) and an archaeological site are on the National Register of Historic Places, not limited to buildings, but the site of the park itself is of historic significance. And, the designation of Itasca as a National Natural Landmark is ignored. Enbridge is ignoring Minnesota's natural heritage and instead only focusing on buildings which the pipeline would not pose threats to as it does to the natural environment.

2375-8

The DEIS document states that there would be negligible impacts on historic resources. I feel this is a cavalier attitude toward these treasured important historical sites.

5) There is what I consider offensive testimony in the docket offered by Jeffrey Lee, Barr Engineering Company on Wild Rice. The testimony speaks of it as if it were a crop which could be replanted and sites could be restored after a spill, by removing sediment from a spill site, then adding lake sediment and reseeded. The National Academy of Science's Dilbit Study would surely discuss the great difficulty of accomplishing what Mr. Lee proposes. We know that wild rice is a gift from the creator which cannot be destroyed by tar- sands contamination, and then restored and made whole again by man-made efforts.

2375-9

It is deceptive in my opinion to promote this project as a replacement. It is a new pipeline which will have the capacity to more than double barrels per day currently carried by Line 3 from 390,00 bpd to a design capacity of 844,00 bpd and they are upgrading their request to 990,000 bpd which substantially more than doubles their current capacity in Line 3. Enbridge states in chapter 2.2 the project would meet demand for refining industry in eastern Canada, the gulf coast and the midwest. How much of this oil they ask for a certificate need for, is going to refineries that will ship to other countries?

As Enbridge would gain capacity from a Line 3 Replacement, they also gained capacity from Line 6. So,

was the Kalamazoo spill actually and great net gain for Enbridge? The Kalamazoo Oil spill which was a devastating environmental catastrophe actually in the end allowed Enbridge to argue for a brand new replacement pipeline in that state. Same as with Line 3, they were able to replace with a new pipe which gives them increased capacity. After the Kalamazoo spill, Enbridge was able to argue for a new pipeline which they stated would be safer, but being a larger diameter pipeline it greatly added to Line 6 capacity. Capacity was increased from 240,000 bpd to 570,000 bpd, which more than doubled the capacity of Line 6. Even considering the cost of the clean up, the cost of Consent Decree agreement, with a pipeline of such increased capacity, I would like to know just how long it took for Enbridge to actually come out ahead and actually gain financially after the spill with the new Line 6 infrastructure.

At the heart project and the DEIS lies a false choice which cancels, in my opinion, real choices for this route which would provide safer and more reasonable alternatives and an honest assessment of need. The fact that the company is able to demand the start and end points of it's proposed route, from Clearbrook to Superior, is wholly unfair and allows the company to demand what is best for profit margin rather than what is best for Minnesota's Natural Heritage and our long term economic well-being. From this ability for the company to demand it's start and end points, flow a process that is inherently flawed and which has not been corrected in this DEIS.

In their August 21, 2014, comments on the Sandpiper, which was the same corridor as Line 3, the MPCA evaluation of the Enbridge Preferred Route and the system alternative routes concluded the Enbridge Preferred Route scored the worse in categories affecting the environment compared to system alternative routes. The MPCA evaluation of the routes concluded the companies Preferred Route would have the greatest potential impact in the following categories; pristine areas of the state, areas in the state with the best water quality, greater risk to state forests, state parks, and WMAs, stands of wild rice, economics dependent on water quality, and of all the routes appears to cover the most linear miles of susceptible ground water, and a much higher density of surface water encroachment. The MPCA's evaluation stated, "Environmental and natural resources protection and the prevention of impacts tend to be less costly and more effective than restoration, therefore, scoring in this instance is based on preventing impacts to high quality areas.

In the evaluation the MPCA stated, "MPCA believes cumulative effects associated with high risk crude oil routes can be reduced or avoided if future terminal facilities were constructed at a location west of Clearbrook with possible benefits to reducing potential impact to our states valuable resources. "

On August 21, 2014 the DNR also commented on the Projects proposted route in the letter to the MN PUC. The letter states, "The Preferred Route for the Sandpiper Project is proposed in a region of the state that contains a concentration of important lakes for fisheries, trout streams, sensitive aquifers, public conservation lands, and mineral and forestry resources. The DNR is also concerned about "greenfield" routing along areas without previous disturbance." The letter expresses concern that the route could become a new corridor for multiple pipelines. The letter states, "The DNR encourages the PUC to strongly consider analysis of one or more system alternatives having fewer environmental and natural resource impacts than the Preferred Route."

2375-10

2375-11

2375-12

Table 12.2-1 - "Reasonably Foreseeable Actions Considered in Analysis" states under item 9, " If a new pipeline is permitted for this project outside of the existing Enbridge Mainline, the new corridor creates an opportunity for future corridor sharing that could ultimately result in accumulation of multiple pipelines within the corridor chosen for the Line 3 Replacement Project. This analysis considers the future addition of another pipeline to a new pipeline corridor. As noted above in highlighted comments, both the MPCA and DNR had very serious concerns with regard to this issue of cumulative effects of multiple pipelines in the watery Preferred Route chosen by Enbridge and requested a safer route.

This DEIS supports Enbridge being allowed to insist on it's Preferred Route start and end points and does not even consider moving the Clearbrook connection upstream to the west to a safer location for our environment to Crookston, makes prominent it's stated project goals, therefore elevating it's profit margin as the most important consideration, while, very seriously jeopardizing Minnesota's environment and the economic livelihood of citizens dependent on our clean water economy.

Right now we see the western US burning up in excessive heat and pending severe water shortages in the west. Why would this particular company's profit margin eclipse the protection of our precious water resources in this state? The company is bent on delivering huge supplies of oil to Superior, Wisconsin. We should all be **alarmed** at the possibility that next they will want to ship oil in the Great Lakes which holds 21% of the world's fresh water. Lake Superior is the largest fresh water lake in the world. Minnesota Sea Grant site indicates that Lake Superior holds 10% of the world's fresh water that is not frozen, it holds 3 quadrillion gallons of water, water retention time is 191 years, is remarkable clean and cold and underwater visibility is superb, sometimes exceeding 75 feet. It is profoundly beyond my imagination that we would put this invaluable, life sustaining resource at risk of being exploited and contaminated by encouraging oil pipelines to continue to route to the shores of Lake Superior!

I find the DEIS discussion of oil demands in the US to be lacking of honesty and devoid of important consideration of other pipeline alternatives ability to meet supply. Who made the decision to frame the discussion in this way?

In chapter 4. (4.2.4) In discussing Certificate of Need, the DEIS states, "Other existing and potential future pipelines were considered as alternatives to the project, 1) if they interconnected in the crude oil supply region near Edmonton, Alberta, and 2) served the same Clearbrook and Superior destinations. The EIS is not evaluating these alternatives based on whether they meet the need for the project." As I look at the document, the DEIS document appears to go so far as to discount the proposed Keystone and the TransCanada Energy East pipelines, which are projects by other companies, as not being relevant for evaluation of meeting US oil demands because they do not interconnect with Clearbrook and Superior. These companies are operating away from the proposed Line 3 route, but with the same desired endpoints as Enbridge's system. Maps of the Keystone system indicates the system when complete would provide lines from Hardisty, Alberta to Cushing to Port Arthur and Houston, Texas and there is an existing branch to Patoka. A completed Trans Canada Energy East Pipeline would connect Hardisty, Alberta to Montreal and from there to St. John, N.B. If Line 3 were approved, the increased oil capacity in the line would provide transport options to Line 5 in Michigan and Line 6 in Wisconsin to Montreal, Patoka and on to Cushing. It is easy to clearly see that the Keystone and Energy East routes

not being the same as Enbridge's Line 3 with respect to connecting between Clearbrook and Superior should have anything to do with available oil supply or crude oil need for this nation.

2375-15
Cont'd

Chapter 1.4, of the DEIS, "Result of denial adversely affects future adequacy of oil supply." Why then does the DEIS not evaluate the potential of Keystone and Energy East pipeline as they would affect oil supply? We saw with Sandpiper, the Dakota Access pipeline changed the demand and need for the Sandpiper. The possible implementation of the Keystone XL or the Energy East pipelines should be considered as to affect on demand and need for Line 3. Europe and other nations are moving away from fossil fuels and moving toward clean energy, along with investors around the globe considering divestment from fossil fuels. It should be stongly considered as to how much capacity is really needed out of the Alberta Tar Sands.

2375-16

When it comes to analysis of SA-04, comparative data is compiled in the DEIS which not only includes miles crossed in Minnesota, but inclues all the other state's miles that SA-04 would go through, thus when compared to the applicant's route, SA-04 environmental impacts will be greatly unfairly scewed to the applicant's route's favor. Oil from the applicant's Preferred Route will also be impacting other states as it goes beyond Superior and this is not considered in the DEIS as is the SA-04 route. 2.8.1 in the DEIS describes the project this way, "Crude oil from Hardisty terminal in Alberta, Canada would be transported in the Line 3 Replacement pipeline to Clearbrook and Superior terminals. From these locations, oil would be distributed into existing pipelines, for delivery from Clearbrook terminal to Minnesota refineries and from Superior terminals to refineries in the Midwest, the Gulf of Mexico and eastern Canada." The refinery in Superior processes 45,000 bpd leaving the majority of the oil in Line 3 to move beyond Superior. From Superior, with the Line 3 Replacement, Enbridge will have the ability to increase volume to Line 5, which goes under the Straits of Mackinaw and thus adding more danger to 21% of the world's fresh water than Enbridge is currently responsible for maintaining a pipeline in that fragile site. Enbridge will also be able to transfer additional oil from Superior that will cross the St. Croix River, endangering that water source and water resources beyond in Wisconsin. It is unfair not to evaluate these very serious and significant threats as oil leaves our state, as they do evaluate effects after SA-04 leaves the state.

2375-17

When we think of entrusting Enbridge with our precious pristine waters, think of this. In the evaluation of the safety of Line 5 going under the Strait of Makenaw, the State of Michigan, found that there was a person conducting the evaluation who was also working for Enbridge at the same time. The State of Minnesota cannot accept an EIS that is brought forth by the hand of Enbridge and it's affiliates. We need an unbiased EIS completed by an entity who cannot gain financially by the placement of this pipeline.

I attended the Line 3 informational public meeting in Bemidji on June 22, 2017. There I saw unmasked a glaring example of the company's attitude toward our precious natural resources. John Swanson, Vice President U.S. Major Projects Execution, spokesperson for Enbridge frequently promotes the company line as he did in a commentary in the Park Rapids Enterprise before the April and May public meetings. In the commentary he stated, "Protecting the environment is important to all of us, and numerous factors went into developing a route that balanced sensitive environmental considerations." But, at the

public meeting in Bemidji on June 22, 2017, in his testimony he said that in regards to the Kalamazoo Spill, the environment of the spill site was better after they cleaned it up than it was before the spill happened. This was an ignorant statement made in front of a people who treasure our resources and many native americans there to speak for protection the Mississippi Headwaters. The statement exposes an attitude of no respect and understanding of "natural resources" and really a hostile dismissive attitude toward creation and the natural world. Does he believe that here too, if there is a massive spill in the Mississippi Headwaters, our pristine lake country or our wild rice lakes and streams , the company could just dig it all out and it could be better than before?

In her book, Nature's Trust, Mary Christina Wood states, "Humanity cannot hope for a livable planet if government agencies continue to license industries to pollute and destroy the remaining natural resource."

Thank you for this opportunity to comment.

Sincerely,

Deanna Johnson

15559 Explorer Circle

Park Rapids, MN 56470

2089 Lake Hattie Dr. SW
Backus, MN 56435
6 July 2017

JAMIE MACALISTER
ENVIRONMENTAL
REVIEW MANAGER
MN DEPARTMENT OF COMMERCE
85 7TH PLACE EAST, SUITE 280
ST. PAUL, MN 55101-2198

Re: Public Comment Line 3 (CN-14-916 and PPL-15-137): Wetland Hydrology

Dear Ms. Macalister,

The Applicant's preferred route crosses some of the States best water and has large areas of undisturbed wetlands. From my review of the DEIS these wetlands are not given the consideration they deserve. Those in the Pine River watershed are critical to the health of the watershed and provide critical habitat in the watershed.

We have already lost 90% of Minnesota's original wetlands and replacement programs do not duplicate the quality and function of the original wetland. The Line 3 route will open a new corridor and additional pipelines will further disrupt the function of these wetlands. In my review of the DEIS I could not find information on the hydrology of these wetlands, i.e. what is the flow rate and direction of flow? What would the impact of compaction and remediation be for specific areas? Where is the information on pipeline failure in wetlands for both winter and summer events? How would small leaks, such as a pin hole leak, be discovered? The XL pipeline review by Exponent predicted downward movement in shallow aquifers with long periods possible before surface evidence of the leak was visible. The DEIS assumes surface evidence nearly at the time of the leak.

The DEIS has explanations for construction in the wetlands, but does not assess the impact of the weirs and other construction techniques on hydrology after refilling the excavation. This is critical, especially when considering multiple pipelines in a corridor. Disrupted flow could have a negative impact on water quality for the Pine River watershed and particularly the Whitefish Chain of Lakes.

2767-1

This portion of the DEIS seems to be deficient and should be reviewed by outside hydrology experts before allowing any construction to begin.

Sincerely,


Gregory L. Johnson

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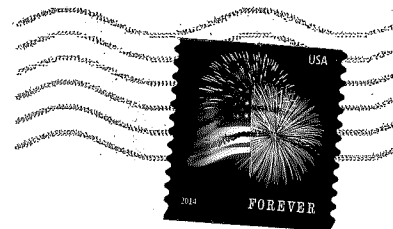
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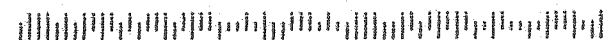
Johnson's
2089 Lake Hattie Dr SW
Backus, MN 56435

MINNEAPOLIS MN 553

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Jamie Macalister
Environmental Remed Manager
MN Dept. of Commerce
857 1st Place East, Suite 280
St Paul, MN 55101-2198



2089 Lake Hattie Dr. SW
Backus, MN 56435
6 July 2017

JAMIE MACALISTER
ENVIRONMENT REVIEW MANAGER
MN DEPARTMENT OF COMMERCE
85 7TH PLACE EAST, SUITE 280
ST. PAUL, MN 5510-2198

RE: Public Comment: Line 3 Project (CN-14-916 and PPL-15-137): SA-04 Route

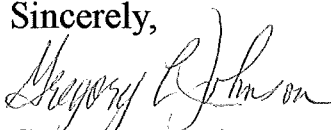
Dear Ms. Macalister

The DEIS seems to be deficient in the analysis of SA-04 as an alternative route to the preferred route as only the Minnesota portion of the preferred route is considered. Since it is a given that almost all of oil proposed for the line will travel through Wisconsin and Illinois from Superior, this mileage and all its features should be a part of the analysis to be an honest comparison of the two routes. This would place SA-04 in a much more favorable position in terms of actual miles of pipeline and add considerably to the water crossing and critical habitat associated with the preferred route for Line 3.

When comparing these two routes the entirety of both from Canada to Illinois should be evaluated for distance, water crossings, wet lands, access, and all other criteria critical to the CON and routing approval. The DEIS basically negates SA-04 on distance using the full 783 miles from the Canadian border to Illinois. At the same time, the DEIS uses only the Minnesota portion of the preferred route, 395 miles from Clearbook to Superior. SA-04 Minnesota mileage is 251 miles. The distance from Superior to Illinois is not given or considered, which is a major flaw in the DEIS. What are the comparative features of both routes in just the Minnesota portion? I could not find this information in the DEIS.

Please consider an independent evaluator to compare these two routes before release of the final EIS.

Sincerely,


Gregory L. Johnson

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JAMIE MACALISTER
ENVIRONMENTAL REVIEW MANAGER
MN DEPARTMENT OF COMMERCE
85 7TH PLACE EAST, SUITE 280
ST. PAUL, MN 55101-2198

RE: Public Comment:Line 3 Project(CN-14-916 and PPL-15-137)

Dear Ms. Macalister:

The following section of the DEIS is referenced because of concern for adequate cathodic protection in the proposed route for line 3.

“2.3.2.3 Cathodic Protection Systems

Cathodic Protection Would Be Installed Within a Year After Construction

The buried pipeline would be protected from external corrosion by application of a coating to the pipeline and by installation and operation of a cathodic protection system. A cathodic protection system must be constructed and operated in accordance with the requirements of 49 CFR Subpart H – Corrosion Control (Section 195.563 and Sections 195.567 through 195.577). The cathodic protection system electrically connects the pipeline to anodes buried in ground beds adjacent to the pipeline and located along the pipeline route. The cathodic protection system would be located within the right-of-way disturbed for construction.

The area necessary for the cathodic protection system anode beds would range between 0.2 and 0.6 acre per system, and the only aboveground features at each


site would be a junction box and small-diameter vent pipe installed above the deep well beds.

Enbridge also would install alternating current/direct current mitigation to protect the pipeline and cathodic protection system from electromagnetic-induced voltage and stray current from co-located electric transmission lines. Enbridge would assess the electric transmission lines (that the Line 3 Replacement pipeline would be co-located with) to determine the extent of cathodic protection necessary for the Project. Section 195.563 of 49 CFR Subpart H – Corrosion Control states that cathodic protection must be in operation no later than 1 year after the pipeline is constructed. “

I am enclosing a copy of the public comments made in Little Falls on Sandpiper and Line 3. Many miles of Enbridge's preferred route go through remote wetlands with difficult access throughout the year. These soils are high conductivity soils. According to the independent study done by The INGAA Foundation, Inc. Criteria for Pipelines Co-Existing with Electric Power Lines, Oct., 2015, cathodic protection is at high risk in this type of soil. Has Enbridge or the DOC had an independent review of the cathodic protection based on this study and the results they put forward? If start-up of the line would be in less than a year, would they be allowed to proceed before adequate cathodic protection is in place?

A copy of the study was entered into evidence when I gave my testimony, so I am not including the study with this letter. For a thorough and independent DEIS, the reliance on Enbridge data seems far too pervasive and needs a competent independent review.

Sincerely,



Gregory L. Johnson

enc. : Public Comments made in Little Falls

COMMENTS FOR PUBLIC HEARINGS ON SCOPING FOR THE ENVIRONMENTAL IMPACT STATEMENT FOR SANDPIPER AND LINE 3

My name is Gregory Johnson and I live north of the City of Pine River. I am a board member of the Pine River Watershed Alliance and serve on the Conservation Committee of the Leech Lake Area Watershed Foundation to coordinate the activities of the two groups for land preservation and watershed protection. We are in the final stages of preparation of the WRAP for the watershed.

The Pine River Watershed has been designated the No. 1 watershed in the state for water quality and for protection of both source and drinking water for Minnesota citizens. The groups mentioned plus the National Forest Service, The Nature Conservancy, the MN Board of Water and Soil Resources, Lake Associations and other public and citizen's groups are seeking ways to protect and preserve this watershed.

I have two complaints about the DOC process before us tonight. With the importance of this critical watershed I strongly feel that a public meeting should have been held in the watershed in Brainerd or nearby city. The locations selected for these meetings limits public input. Second, during the certificate of need and routing process, many people have written letters to the PUC and DOC. Very few of the letters critical of Enbridge's choice of pipeline routing and questioning the pro Enbridge bias of the process thus far have been included in the public record published on your website. None of the letters I have written have appeared on this record. Letters written by those who favor the proposed pipeline route, like Chambers of Commerce or Unions are quickly posted, even if received outside the comment period.

With regard to the Scoping EAW and DSDD I have a number of comments to make. First, I must say that I am not opposed to pipelines. Because of my involvement and the knowledge I have of the watershed and the fact that Enbridge's proposed route crosses the entire watershed, I am strongly opposed to the route selected by Enbridge. Your scoping documents do not state that a complete and thorough EIS was mandated by court action and I think that should be an essential part of the documents.

This Enbridge pipeline corridor is not a Minnesota project. It is a multi-state project and according to Minnesota statute 4410.2100, Sub. 4., "Connected actions and phased actions. Multiple projects and multiple stages of a single project that are connected actions or phased action must be considered in total when determining the need for an EIS and in preparing the EIS." This pipeline project includes Canada, North Dakota, Wisconsin, and potentially South Dakota, Nebraska, Iowa and states further south to the Gulf Coast, perhaps with export beyond that. Therefore it needs to be completed with all appropriate state and federal authorities involved as required by NEPA and MEPA.

The scoping document needs to be clear about the purpose of the project. What is the public purpose of this project? We know the private purpose and the economic incentive for Enbridge to site the project in the corridor they proposed, but EQB states clearly that "in applying exclusion criteria, the RGU must not be overly restrictive in defining the project's purpose and need. Occasionally an RGU will claim desirable but nonessential elements as part of the project's purpose and need, thus eliminating alternatives that should be included. In many cases these are cost-related factors and, while important, they cannot overrule environmental considerations."

The scoping DSDD states on page 15, 4.3, "no field data will be collected and that the applicant's field data will be used." Has this data been scientifically verified and validated by an outside, independent reputable organization or is this again pro Enbridge bias? Does the applicant's field data include all five alternate routes that have been proposed by other public entities? Does Enbridge's data meet the criteria necessary for a complete and scientifically sound EIS that delineates risks, including long-term health of this critical watershed? I think not, due to the overwhelming self-interest (not public interest) of a private company. The RGU for this project should be an agency with the scientific knowledge and with experience in doing a comprehensive EIS. I do not think that the DOC qualifies as such an agency.

On page 13 the scoping document states, "the Pine River Facility will be improved." To my knowledge there are no pipelines currently in the Pine River area. Was this facility recently constructed by Enbridge and if so, did it have prior approval from the DOC or PUC?

The scoping document gives one brief mention of colocation of the pipeline with overhead high voltage transmission lines. I would like to submit for the record The INGAA Foundation, Inc. Criteria for Pipelines Co-Existing with Electric Power Lines, as the data in this report would put Enbridge's proposed route in the high risk category. This report was published in October of 2015.

Much has been said concerning the job creation of this corridor. If a corridor is approved for a Minnesota location, how many of the construction jobs will actually be given to Minnesota residents? How many union pipeline workers from out-of-state will be on the project? If we are truly concerned about Minnesota employment, we should require that the pipeline be built with US produced pipe secured from Minnesota produced iron ore. Perhaps then the legislature would not have needed to extend unemployment benefits for Minnesota miners.

In conclusion, you are being tasked with evaluation of a new pipeline corridor which may or may not need to be located in Minnesota. The EIS scoping should be done in conjunction with all appropriately qualified authorities in the route selection and should also be done with Federal help and coordination. This is too important a decision, with long-term consequences to clean water for the citizens of Minnesota, to be fragmented and considered in isolation, or scoping it to meet the narrow interests of one Canadian company.

Submitted to the DOC Public Hearing on April 26, 2016 at Little Falls, MN by:

Gregory L. Johnson
2089 Lake Hattie Dr SW
Backus, MN 56435
218/316-0560

Encl: The INGAA Foundation, Inc. Criteria for Pipelines Co-Existing with Electric Power Lines,
Oct., 2015

Levi, Andrew (COMM)

From: Misa Joo <misa@misajoo.com>
Sent: Monday, July 10, 2017 3:31 AM
To: MN_COMM_Pipeline Comments
Subject: Docket # CN-14-916 and PPL-15-137 to James MacAllistar, Environmental Review Manager, MN Dept of Commerce

To James MacAllister:

I am very much concerned about the effect of the Enbridge Pipeline on Minnesota's environment, the health of the people, tribes, climate. I will list the DEIS sections which are inaccurate, biased, incomplete or unfair.

Impacts on Tribes:

1) Tribes were consulted only after the project was designed. It was not free, prior and informed consent as is the international standard of the UN for projects that impact tribes.

2381-1

2) Much of the issues specific to tribes and tribal resources are excluded from the main chapters assessing impacts. We are not comfortable with that because it lets the EIS avoid drawing conclusions about impacts on tribes (Chapter 9)

2381-2

3) Chapter 9, "Tribal Resources," states that ANY of the possible routes for Line 3 "would have a long-term detrimental effect on tribal members and tribal resources" that cannot be accurately categorized, quantified, or compared (9.6). It also acknowledges that "traditional resources are essential to the maintenance and realization of tribal lifeways, and their destruction or damage can have profound cultural consequences" (9.4.3). This does not acknowledge the treaty responsibilities the state of Minnesota has to the tribal members.

2381-3

4) Chapter 11, "Environmental Justice," acknowledges that pipeline impacts on tribal communities "are part of a larger pattern of structural racism" that tribal people face in Minnesota, which was well documented in a 2014 study by the MN Department of Health. It also concludes that "the impacts associated with the proposed Project and its alternatives would be an additional health stressor on tribal communities that already face overwhelming health disparities and inequities" (11.4.3).

2381-4

5) The DEIS concludes that "disproportionate and adverse impacts would occur to American Indian populations in the vicinity of the proposed Project" (11.5) But it also states that this is not a reason to deny the project!

6)Chapter 6 states that Enbridge's preferred route would impact more wild rice lakes and areas rich in biodiversity than any of the proposed alternative routes (Figure ES-10). Very big concern.

2381-5

7) Most of the analysis of archaeological resources in the path of the pipeline rely on Enbridge's surveys. For some reason, only three of their eight surveys are available, and the five missing are the most recent! In those, Enbridge found 63 sites, but claims that only three are eligible for protection under the National Register of Historic Places. (5.4.2.6.1). Honor the Earth has had the studies we have been able to see reviewed, and there are numerous flaws in their methodology.

8) The DEIS acknowledges that "The addition of a temporary, cash-rich workforce increases the likelihood that sex trafficking or sexual abuse will occur," and that these challenges hit Native communities the hardest. But the DEIS dismisses this problem quickly, saying that "Enbridge can prepare and implement an education plan or awareness campaign around this issue" (11.4.1). I agree with the question posed "What experience does Enbridge have planning and implementing an anti-sex trafficking program?" I want to add that there is real

concern, the number of sexual abuse and trafficking and pipeline workforce. Very concerning and a huge impact on tribes.

Big Picture Concerns

1) Enbridge has a history of not following rules violating permit conditions. Please analyze the likelihood of compliance from Honor the Earth's compilation of the record of violations. Too many of the environmental impact and plans for minimizing them come directly from Enbridge's permit application without any evidence of compliance or any consideration of Enbridge's non-compliance

2) The Alternatives chosen for comparison to the pipeline proposal are absurd -- for example, the only rail alternative assumes the construction of a new rail terminal at the US border, and thousands of new railcars to transport oil to Clearbrook and Superior. Enbridge would never do that. The only reasonable rail option would begin in Alberta. The truck alternatives are similarly unreasonable.

3) The "No Build" Alternative is not genuinely considered. It is framed as "Continued Use of Existing Line 3" (Chapters 3 and 4), but nowhere is the "Shut Line 3 Down" option considered. There is no discussion of renewable energy, conservation, or the rapid development of electric car infrastructure. There is no assessment of the decline in oil demand. The entire study assumes that society needs X amount of oil, simply because Enbridge says they can sell it. That assumption ignores the massive fossil fuel subsidies and debts that make Enbridge's profits possible, and avoids the moral question of what is good for people and the planet. We know we must stop burning fossil fuels yesterday.

4) There has been no discussion of how all this extra oil will go once it leaves Superior, Wisconsin. With 370,000 bpd of additional capacity, Enbridge will need a new pipeline departing its terminal in Superior. We know that they plan to build Line 66 through Ojibwe territories in Wisconsin, but they continue to deny this. Minnesota must ask this!

5) The DEIS contains no spill analysis for tributaries of the St. Louis River or Nemadji River, where spills could decimate Lake Superior and the harbors of the Twin Ports.

2381-6

6) For calculations of impact, the lifespan of the new Line 3 is estimated at *30 years*. But Lines 1-4 are 55-65 years old! And hasn't the technology improved? The lifespan should be at least 50 years, a shorter lifespan is a clear indication that Enbridge themselves know that the fossil fuel era is coming to an end. In Honor the Earth's analysis, we have attempted to predict the impacts of this pipeline on the next 7 generations.

7) This project is a further investment in a dying Tar Sands industry. Numerous international oil companies and financing institutions are divesting from the tar sands. Why should Minnesota invest in this industry? Why should our Nation be forced to deal with a bad idea in perpetuity.

8) The DEIS assumes that the Koch pipelines to MN refineries get all their oil from Line 3, but the current Line 3 does not supply enough capacity for this (390,000 barrels per day), and we know that some of it comes from Line 81, which brings oil from the Bakken in North Dakota.

Risks, Oil Spills

1) The seven sites chosen for spill modeling are not representative of the locations and resources put at risk along the entire corridor. A more thorough analysis of different locations is needed - for example, what about Lake Superior?

2381-7

2) There is no analysis on Enbridge's leak detection system, or their inability to respond quickly to major emergencies.

3) Enbridge's response plans are highly guarded, and Honor the Earth's attempts to receive and review these documents has been blocked. What we can infer is that Enbridge relies on local first responders for their emergencies. They attempt to use the money they donate to communities along their corridors as proof that they have an integrated emergency response program.

The DEIS estimates the annual probability of different kinds of spills on the proposed route in MN:

- Pinhole leak = 27%
- Catastrophic = 1.1%
- Small Spill = 107%, Medium = 7.6%, Large = 6.1%

So in 50 years, we can expect 14 pinhole leaks, 54 small spills, 4 medium, 3 large, and 1 catastrophic!

Abandonment

1) The risks of pipeline abandonment are not adequately assessed. For example, there is no discussion of landowner property values and the effect that an abandoned pipe could have on them, especially if there is indeed "legacy contamination" on people's land.

2381-8

2) Impacts on human and natural resources due to the abandoned Line 3 are anticipated to be minimal in the near term but could be significant in the longer term, absent effective monitoring, adaptive management, and the timely introduction of mitigation measures. There is not much information on what these mitigation and management plans are.

3) If there is a dearth of surrounding soil, or if the cover for the pipeline is relatively shallow, the pipeline bears more of the load and, all things being equal, is more likely to fail. We know from experience that there are numerous areas where the pipes are exposed and near the surface.

4) There is also no discussion of exposed pipe, how fast it will corrode, or how much currently buried pipe will become exposed once it is emptied. "When a pipe is empty, the weight of the liquid load that once contributed to buoyancy control is lost. As a result, the pipe could become buoyant and begin rising toward the surface at watercourse crossings, in wetlands, and in locations where soil density is low and the water table is high" (8.3.1).

2381-9

5) We know that the abandonment of the existing line 3 is bad. But there is also no mention of the abandonment of the other 3 ancient pipelines in Enbridge's existing mainline corridor (Lines 1, 2, and 4), which we expect Enbridge will very soon attempt to abandon. Nor is there any discussion of the abandonment of the NEW Line 3 in the future.

6) The DEIS states that it will be very risky to remove and clean up the existing Line 3 because the pipelines are very close together. "The distance between pipelines within this corridor varies, but they are generally 10 to 15 feet apart" (8.3.1). This is not consistent with our extensive observations and physical measurements on the land. Also, don't they dig up pieces of pipe for maintenance purposes all the time? Why is it suddenly risky?

2381-10

7) The DEIS simply states that "Enbridge has indicated that it would develop a contaminated sites management plan to identify, manage, and mitigate historically contaminated soils and waters" found during the abandonment

or removal of the existing Line 3 (8.3.1.1.1). We want to see that plan. We want Honor the Earth and the people to see the plan.

Construction and Restoration

1) Chapter 2, "Project Description" states that Enbridge has requested a 750-foot route width (375 feet on each side of the Line 3 Replacement pipeline centerline). They claim only 50 of the 750 feet would remain a permanent right-of-way (2.1) All of this width should be included in an impact analysis because Enbridge's environmental protection plan and record is abysmal.

2) Their "restoration" plans for restoring the landscape around the corridor after installation is laughable. Enbridge's process for restoring wetlands includes dumping the now compacted (and probably de-watered) soil back in the trench, sowing some oats and "letting nature take it's course". This is not how you re-establish a wetland. Studies have shown that even with proper restoration practices, it can take decades to get back to the biological functioning it was at prior to disturbance. When Enbridge stores the soil, they will also be driving equipment over it- which compacts it, they also plan to compact the soil after refilling the trenches. This is not good for the soil.

2381-11

3) Cathodic protection, which applies electric current to the pipeline in order to protect it from corrosion caused by nearby utility lines, will not be installed for up to 1 year after pipeline construction (2.3.2.3). Lack of cathodic protection is what caused many pinhole leaks in the Keystone pipeline, almost immediately after construction. The proposed route for Line 3 follows a utility corridor for much of its length - this is a recipe for disaster. Even the US Army Corps's rubber-stamp approval of the Dakota Access pipeline required the cathodic protection system to be installed within 6 months!

2381-12

Economic Impacts Please take this seriously!

1) Chapter 5, "Existing Conditions, Impacts, and Mitigation" states that Line 3 will create ZERO permanent jobs. Enbridge's application states that "existing operations staff would be able to operate the [pipeline] and that few additional employees would be hired to assist the staff" (5.3.4).

2) Also in Chapter 5, the DOC assumes "all workers would re-locate to the area" and ZERO construction jobs will go to Minnesotans. The pipeline would have "no measureable impact on local employment, per capita household income, median household income, or unemployment" (5.3.4).

3) The DEIS does not acknowledge that when the existing Line 3 shuts down, Enbridge will stop paying taxes to the MN counties along the mainline corridor. For many of these poor counties in the north, revenue from Enbridge's property tax makes up a significant portion of the county budget. There is also the issue that Enbridge is now in the process of appealing years of back taxes, burdening two of the poorest counties in Minnesota with over \$10 million due.

Climate Change is real

1) The DEIS acknowledges that Line 3 would contribute to climate change. It analyses 3 different types of emissions - direct, indirect, and lifecycle. Direct emissions are those that the pipeline infrastructure itself emits, and these are very small. Indirect emissions are those created by the power plants that provide electricity for the pipeline's pumping stations, and these are significant. Lifecycle emissions are those caused by the refinement and eventual use of the oil, and these are massive. Line 3's direct and indirect emissions alone would be 453,000 tons of CO2 per year. Over a 50-year lifespan, that would cost society an estimated \$1.1 billion. (Executive Summary p.18).

2381-13

2) The lifecycle emissions of Line 3 would be 193 million tons of CO2 each year. Over a 50-year lifespan, that would cost society an estimated \$478 billion (5.2.7.3)

3) The DEIS does not discuss the unprecedented challenges of human casualty, displacement, conflict, natural disaster, biodiversity loss, etc, that climate change is causing, or the consensus from the scientific community that we must leave fossil fuels in the ground. It also fails to acknowledge that across the planet, Indigenous people are disproportionately impacted.

4) The DEIS affirms that the MN PUC can only grant the permit if "the consequences to society of granting are more favorable than the consequences of denying the certificate." Regardless of whether or not Enbridge can find customers, the DEIS shows that the negative impacts far outweigh the benefits. 2381-14

I completely support Honor the Earth's position and have read their critique. I ask you to issue NO PERMIT. I ask you to stand up for your people and future generations and SHUT DOWN LINE 3 AND DEVELOP RENEWABLE ENERGY INFRASTRUCTURE. Your people take the lead in protecting their state. Please take leadership to do so. Protect the health, the treaties, the resources of your beautiful state. We care, from all over this country, and we are watching and praying. Thank you for your attention. Sincerely, Misa Joo, 2327 Jefferson Street, Eugene, Oregon, 97405

Levi, Andrew (COMM)

From: Erin Jordahl Redlin <ejr0904@gmail.com>
Sent: Monday, July 10, 2017 10:54 AM
To: MN_COMM_Pipeline Comments
Subject: Comments on Line 3 DEIS CN-14-916 and PPL-15-137

Minnesota Department of Commerce:

I find the Enbridge Line 3 Draft Environmental Impact Statement (CN-14-916 and PPL-15-137) to be unacceptable for several reasons.

1. DEIS Chapter 5.2.1.2.4

Horizontal Directional Drilling (HDD) will be used to cross under our most pristine, most sensitive waters, and anywhere there is flowing water, which describes most of the route. The potential exists for contamination through release of drilling fluid to the ground and/or water, termed a "frac-out." The DEIS cites a 35 mile section of Enbridge pipeline in Michigan where there were 11 HDD crossings, multiple minor releases and 2 major frac-outs. MN will not accept the risk of a frac-out every 5.5 river crossings.

2. DEIS Chapter 10.4.1

Regarding river oil spills, the DEIS uses a 10 mile Region of Interest (ROI), when we know that an oil spill can pollute more than 35 miles downstream (Enbridge's oil spill in the Kalamazoo was 35 miles). The ROI in the EIS should include at least 35 miles of impact.

2349-1

3. The risk from Line 3 is in conflict with several of our Minnesota Statutes:

1. MN Statute 103F.305 Scenic River Protection Policy

<https://www.revisor.mn.gov/statutes/?id=103F.305>

2. MN Statute 116D.02 Declaration of State Environmental Policy

<https://www.revisor.mn.gov/statutes/?id=116d.02>

2349-2

I was raised in Holyoke, in Carlton County. I have a special place in my heart for the Kettle River, a beautiful waterway in that part of the state. And a waterway that would be crossed twice by the proposed Line 3 pipeline.

The Kettle River is a tributary of the Wild and Scenic St. Croix River, a river that is very important to my family. We gather there during good and bad times.

The day before I married my husband, our families rode up and down the St. Croix together, celebrating our soon-to-be joined lives.

And when my grandfather died five years ago, his family - his children, grandchildren, and great-grandchildren - gathered on the banks of the St. Croix, to remember and mourn the man who helped teach us to love being on the river.

It is clear that the DEIS for Enbridge's Line 3 preferred route does not adequately protect Minnesota's lakes, rivers, streams, and wild rice beds.

When, not if, the pipeline breaks, how will we explain the ensuing destruction to our kids? How will we justify to future Minnesotans the decision to endanger the heart of what makes our state so special? How will we make them understand that we put oil and money ahead of water, something we can't live without?

When the pipeline breaks, and tar sands oil spills into our lakes, rivers, streams, and wild rice beds, some of that damage will be forever. We won't get back the special places that we hold in our hearts, the waters that make this state so amazing.

I don't want to imagine celebrating future milestones in my family's life without the St. Croix River being part of those moments.

I don't want to imagine a Minnesota in which Native people can't harvest wild rice because the rice beds are polluted by pipeline construction contamination or oil spills.

The DEIS highlights some of the risks of running a tar sands oil pipeline through a place filled with water. It is our responsibility to avoid that risk. The DEIS must be redone, to more accurately account for the risks inherent in siting a tar sands pipeline. And to pay greater attention to the impact on Native peoples and concerns of environmental justice.

Erin Jordahl Redlin
St. Anthony Village, MN