

Levi, Andrew (COMM)

From: JOHN KENNEDY <lucynjohn@msn.com>
Sent: Monday, July 10, 2017 11:32 PM
To: MN_COMM_Pipeline Comments
Subject: DEIS Enbridge Line 3 Docket numbers CN-14-916 and PPL-15-137

To: Jamie MacAlister

Please include this comment on the Line 3 DEIS in Dockets CN-14-916 and PPL-15-137.

I am from West St. Paul, Minnesota

The Line 3 Pipeline concerns me because of the way tribal impacts are treated in the DEIS. The United Nations international standard for projects that impact Indigenous Peoples is Free, Prior, and Informed consent. Tribal consultancy after the project is already proposed and designed is not free or prior or informed consent.

Most of the issues specific to tribal people and tribal resources are confined to a separate chapter that attempts to provide "an American Indian perspective." They are excluded from the main chapters that assess potential impacts. This allows the EIS to avoid drawing conclusions about the impacts on tribal people. ((Chapter 9)

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 states that "traditional resources are essential to the maintenance and realization of tribal life ways, 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. 2387-1

Other tribal impacts that are not adequately addressed include the destruction of wild rice waters, the likelihood of sex trafficking in Native communities during construction of the pipeline, and destruction of Native artifacts. (See Chapters 9 and 11) 2387-2

There is not enough analysis of spill risk. There needs to be more analysis of Enbridge's leak detection system and their ability to respond quickly to emergencies. 2387-3

In the DEIS, there is not a sufficient assessment of the risks of pipeline abandonment. More information is needed in regard to landowner property values. What are the actual management and mitigation plans? 2387-4

We need to see the plan which Enbridge says it has to identify , manage , and mitigate historically contaminated soils and waters found during abandonment or removal of the existing Line 3 (8.3.1.1.1). 2387-5

It is very troubling that no Minnesotans would be hired for the construction of the pipeline. ((5.3.4).

It is also troubling that Enbridge would cease paying taxes to the MN counties along the mainline corridor when the existing Line 3 shuts down, and that Enbridge is in the process of appealing years of back taxes in two of the poorest counties in MN (over \$10 million due). This is an unacceptable burden on these communities.

The climate change costs of Line 3 acknowledged in the DEIS are simply unacceptable: the lifecycle emissions of Line 3 would be 193 million tons of CO2 each year, costing society an estimated 478 billion over a 50-year lifespan. (5.2.7.3.)

My recommendation is: NO PERMIT. SHUT DOWN LINE 3 AND DEVELOP RENEWABLE ENERGY INFRASTRUCTURE.

Thank you for taking my comments.

Sincerely,
Lucille Allison Kennedy
West ST. Paul, MN

Levi, Andrew (COMM)

From: Julie Kilpatrick <jkilpatrick@me.com>
Sent: Friday, June 30, 2017 10:52 AM
To: MN_COMM_Pipeline Comments
Subject: Re: CN-14-916 and PPL-15-137

I meant add our addresses. See below.

On Jun 30, 2017, at 10:41 AM, Julie Kilpatrick <jkilpatrick@me.com> wrote:

These are our comments related to dockets CN-14-916 and PPL-15-137.

We are concerned about the proposed pipeline Line 3 and impacts on Tribes and other concerns outlined below.

The UN International standard for projects that impact Indigenous People is free, prior and informed consent. Consulting tribes after the project is proposed and designed is not free, prior or informed consent.

Chapter 9.6 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).

Chapter 11 “Environmental Justice” 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)

The DEIS concludes that “disproportionate and adverse impacts would occur to American Indian populations in the vicinity of the proposed Project” (11.5) This alone would be enough reason to deny the project.

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). This is a big concern.

History shows that Enbridge violates permit conditions. The DEIS should analyze the likelihood of compliance for environmental impacts.

The “no build” alternative is not genuinely considered. There is no discussion of renewable energy, conservation or the rapid development of electric car infrastructure. The entire study assumes that society needs a certain amt of oil. That assumption avoids the moral question of what is good for people and the planet.

There is no spill analysis for tributaries of the St Louis or Nemadji rivers. There is no analysis on Enbridge’s leak detection system or their ability to respond to major emergencies.

1034-1

The Tar Sands industry is dying. Many oil companies are divesting from tar sands. Given that knowledge, why should MN invest in this industry.

The DEIS estimates the probability of different kinds of spills on the proposed route. Based on the estimates in 50 years we can expect 14 pinhole leaks, 54 small spills, 4 medium, 3 large and 1 catastrophic spill. This is not acceptable.

There is 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)

1034-2

The DEIS 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 need to see that plan.

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)

These are just some of my concerns. The DEIS about Line 3 shows that the negative impacts greatly outweigh the benefits.

We strongly urge no permtng. Shut down line 3 and develop renewable energy infrastructure.

Julie Kilpatrick Stillwater MN
Andrew Jenks Stillwater
John Heselton Woodbury MN

Levi, Andrew (COMM)

From: Julie Kilpatrick <jkilpatrick@me.com>
Sent: Friday, June 30, 2017 10:42 AM
To: MN_COMM_Pipeline Comments
Subject: CN-14-916 and PPL-15-137

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We strongly urge no permitting. Shut down line 3 and develop renewable energy infrastructure.

Julie Kilpatrick

Andrew Jenks
John Heselton

Levi, Andrew (COMM)

From: Ackroeger@aol.com
Sent: Monday, July 10, 2017 8:51 AM
To: MN_COMM_Pipeline Comments
Subject: Dockets CN-14-916 and PPL 15-137

Amelia Kroeger
 10720 Toledo Court
 Bloomington MN 55437
 952-884-3406

To: Jamie MacAlister, Environmental Review Manager

I have been aware of and followed the Enbridge pipeline issue for quite a few years. In the past year my interest was rekindled by the Dakota Access Pipeline revolt on the edge of The Standing Rock Reservation, very near Cannon Ball. Our family lived in Cannon Ball for four years in the 1970s. We were VISTA volunteers working on what was called the Inyan Wakagapi Human Development Project. Among many other observations, it was in Cannon Ball that we first began to grasp that water was more than a taken for granted convenience. After we relocated to Minnesota in 1980, due in no small part to outreach efforts of the Minnesota Pollution Control Agency, our consciousness grew toward water quality and safety.

Therefore, I have numerous questions pertaining primarily to water quality and safety in the Environmental Impact Statement for the proposed Enbridge Line 3 Pipeline. Here are but a few:

- 1.) Are the groundwater hydrogeology assessment firms known to have a close relationship to Enbridge? Are those companies the sole authority drawn on? Who hired and contracted with the companies, Enbridge or the State?
- 2.) In the Executive Summary, page 14, it is written - "There is no one way to measure the general region-wide or state-wide differences in surface water resource quality across Minnesota." Just what were the measures or procedures used? If not MPCA, should I now understand that the water's trophic state index is not dependable? 2400-1
- 3.) Enbridge is proposing to horizontally drill under streams and rivers, not unlike the Dakota Access Pipeline drilling under the Missouri River near Cannon Ball, ND. It is my understanding that those drilling processes contain potentially hazardous to wildlife and plant life additives. Shouldn't the public be made aware of those additives since there is always the possibility for a fracture - wasn't there a fracture about a decade ago during the MinnCan Line 4 venture? 2400-2
- 4.) Enbridge Line 3 would pass under the Mississippi near the headwaters in Itasca State Park. Is it wise to allow any potentially hazardous pipeline in any state park? 2400-3
- 5.) Finally, SA-04 indicates that no wild rice waterbodies would be impacted. However there appears to be a contradiction - the applicant's preferred route would result in impacts on about 5 acres of wild rice waterbodies. Yet the table reads 3 acres. Which is it? And, is there any justification whatsoever to potentially negatively impact any wild rice waterbody?

Thank you most kindly,

Amelia Kroeger

The climate modeling in the DEIS covers a time horizon of 30 years. This timeline corresponds with the estimated operating life of the pipeline. This timeline is much too short. Most directly, 30 years is a low estimate for the operating life of the pipeline, as many pipelines operate for 60 years or more. More importantly, the impacts of GHG emissions are long-lived and will not simply stop when the pipeline stops operating. I have two young daughters, and I am very concerned about the type of world they will be living their adult lives in if climate change is not checked. Under a scenario in which this project and others like it go forward now, in 30 years they will just be starting their careers and families in the environment wrought by climate change. We must account for the costs they will face throughout their lives as a consequence of fossil fuel development now. The climate change modeling timeframe should be extended to at least 60 years to more fully account for these costs.

Alternative scenario with no Line 3

One of the most concerning aspects of the DEIS is the underlying assumption that the oil that would be transported by Line 3 must be transported. All of the alternatives proposed in Chapter 4 are simply different ways of moving the oil that would be transported by the rerouted Line 3. But the first criterion for the Certificate of Need is, "The probable result of denial would adversely affect the future adequacy, reliability, or efficiency of energy supply to the Applicant, to the Applicant's customers, or to the people of Minnesota and neighboring states." There are sources of energy other than the oil transported by Line 3, and the EIS should be expanded to consider those alternatives. It need not delve into all sources of alternative energy in detail, but should present the possibility that, if the current Line 3 were to be shut down and no alternative constructed, Minnesotans and others could meet their energy needs in other ways. Some basic analysis of how much energy capacity would be required and how many solar panels and/or wind turbines would be required to meet the demand would be welcome. Such an alternative should recognize the differences in the various environmental impacts enumerated for the new Line 3 (most notably GHG emissions and water quality impacts, particularly in the case of an "accidental release") and an alternative energy scenario.

Making these changes will result in a more complete assessment of the environmental consequences of approving the Line 3 proposal and the alternatives available to the people of Minnesota, which will enable a more informed decision as to whether the "consequences to society of granting the CN are more favorable than the consequences of denying the certificate."

Sincerely,
Dr. Tracy Kugler

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Tracy Kugler, PhD takugler@umn.edu
Research Project Manager - IPUMS Terra

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June 8, 2017

Jamie MacAlister
Environmental Review Manager
Minnesota Department of Commerce
85 7th Place East, Suite 280
St. Paul, MN 55101-2198

Re: Docket Numbers CN-14-916 and PPL-15-137

The Draft Environmental Impact Statement (DEIS) for Enbridge's proposed new Line 3 pipeline makes a fair beginning, but many crucial points remain inadequately addressed. For example:

Chapter 8 states that "In the near term, impacts on socioeconomics are anticipated to be minimal." Long-term impacts should be evaluated as well.

0335-1

The DEIS 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). The environmental impact statement should assess the credibility of any plan for this important issue, not simply report that Enbridge will develop one later.

0335-2

The DEIS conclusion that "Enbridge can prepare and implement an education plan or awareness campaign around this issue" of sex trafficking, and sexual abuse, is wholly insufficient. Analysis here must include studying any such plan or campaign in detail, and determining whether or not they will be *effective*, rather than simply prepared and implemented.

0335-3

Issues impacting Native Americans should be included in the main chapters, rather than segregated as a peripheral "perspective."

Finally, in general the DEIS skims over climate change and its impacts. Overwhelming scientific consensus forecasts that continued fossil fuel exploitation will not only alter the climate, but contribute to biodiversity loss, increased geopolitical conflict, and population displacement; all of these must be factored into a proper assessment of whether or not "The consequences to society of granting the CN are more favorable than the consequences of denying the certificate."

Sincerely,



Matt Kuhns

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