

**Levi, Andrew (COMM)**

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**From:** Deborah DeLuca <ddeluca@duluthport.com>  
**Sent:** Monday, July 10, 2017 5:26 PM  
**To:** MN\_COMM\_Pipeline Comments  
**Cc:** Becky McMillan; Deborah DeLuca  
**Subject:** Enbridge Line 3 Replacement Draft EIS; Document Numbers PPL-15-137, CN-14-1916  
**Attachments:** Enbridge Line 3 - Draft EIS Support July 2017 to MN DOC (Autosaved).pdf

The Duluth Seaway Port Authority submits the attached letter in support of the Enbridge Line 3 Replacement project – specifically in regards to Document Numbers PPL-15-137 and CN-14-1916. Please call or email if you have problems with the attachment.

Thank you,

*Deborah DeLuca*

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July 10, 2017

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Jamie MacAlister, Environmental Review Manager  
 Minnesota Department of Commerce  
 85 7th Place East, Suite 500  
 St. Paul, MN 55101-2198

Re: Enbridge Line 3 Replacement Draft EIS;  
 Document Numbers PPL-15-137, CN-14-1916

Dear Ms. MacAlister:

The Duluth Seaway Port Authority (DSPA) is writing in support of Enbridge's Line 3 Replacement Project. Specifically, we ask that the Minnesota Department of Commerce (DOC) approve the Draft Environmental Impact Statement (EIS) for the project, and that the Minnesota Public Utilities Commission (PUC) approve the certificate of need and preferred route applications for the project.

In regards to the certificate of need: the replacement project is needed. All pipeline projects face loud and organized opposing voices in the current pop-culture environment, and this project is no exception. A major point in the opposition rhetoric is that the nation is moving to renewable energy sources, rendering the need for petroleum products and their transport obsolete. A second major point is that pipelines pose an unacceptable threat to the environment.

While the DSPA encourages and applauds the transition to renewable energy sources (we are the number one Port on the Great Lakes for wind energy equipment), we are compelled to raise an importune but unavoidable fact. In 2016, only 10% of the Nation's total energy consumption was supplied by renewable sources<sup>1</sup>, and this is not projected to increase significantly by 2040. The bulk of renewable energy is currently used for electricity. We are still using petroleum and will be for some time into the future. The crude oil that moves through Line 3 is refined for use as fuel and as a feedstock for a wide variety of products that all of us use every day, including medical supplies, eye- and sun-glasses, bike parts, auto- and jet components, asphalt for roads and roofs, and poly-fiber fabrics used to make clothing, outdoor gear and tents. We all use refined petroleum products. Let's ensure that crude oil is delivered safely and securely by replacing Line 3, which is a key component of the safe energy transportation network used to deliver crude oil to refineries in the upper Midwest.

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<sup>1</sup> U.S. Energy Information Administration, Monthly Energy Review (April 2017), Tables 1.3, 1.4a, 1.4b, and 2.1-2.6.

In regards to the Draft EIS: the document is well prepared and thorough. The EIS scoping process led to a good selection of alternative routes for assessment, and the entire EIS preparation process through the proposed public hearings (scheduled for September through November 2017) is effectively designed for public input opportunities. We call upon the DOC and the PUC honor the existing regulatory process and keep the EIS timeline to the statutory deadline of 280 days.

The preferred route follows existing utility corridors and avoids environmentally and culturally sensitive lands to the extent possible. The Draft EIS effectively demonstrates that the preferred route generally minimizes environmental risks (GHG emissions, likelihood of spills and associated environmental damage to habitat of varying sensitivities). The proposed Line 3 Replacement project will restore capacity of the line and reduce the need for maintenance. The new pipeline coupled with Enbridge's monitoring and spill response practices should maximize safety and efficiency for transport of crude oil.

If the PUC chooses not to grant permits to replace Line 3, Enbridge will continue to operate the old line as permitted. Furthermore, additional crude oil will move on rail and trucks because Line 3's capacity will continue to be reduced. This will cause more wear and tear on roads and rail and increased congestion, slowing the movement of other goods to market. This option also increases inconvenience and safety risks for communities along rail routes. According to the US Department of Transportation, pipelines are the safest way to transport crude oil.

The Line 3 Replacement Project has the potential to create more 6,500 jobs for Minnesotans over a two-year period in construction, hospitality, supplies and manufacturing, according to a recent study by the University of Minnesota Duluth. While opponents like to claim that the State's tourism industry will suffer in the event of a spill, it is important to recognize that without crude oil, there wouldn't be a tourism industry in Minnesota. All facets of the tourism experience hinge on petroleum products: fuel to travel to Minnesota's hinterlands, fuel for boats, fiberglass for canoes, and plastics in life jackets, bicycles, skis, and hunting and fishing equipment.

Expanding pipeline capacity becomes an impetus for future economic growth and development here in the Twin Ports as well. Fifteen percent of the nation's oil already passes through Superior. The potential increase in capacity will lead to additional infrastructure investment on both sides of the harbor. It's these kinds of investments that leverage additional opportunities to increase the global competitiveness of the Port of Duluth-Superior and the region as a whole.

We urge the PUC and the DOC to issue the certificate of need and approve the Draft EIS and the preferred route. Thank you for the opportunity to comment.

Sincerely,



Vanta E. Coda II  
Executive Director