

As a Minnesotan living in a city on Lake Superior - and someone for whom the entire watershed holds deep value and meaning - I believe the Enbridge Line 3 revised Final Environmental Impact Statement (FEIS) falls short and should not be found adequate, and that the PUC should deny both the certificate of need and the routing permit.

The record already shows this project would bring more harm than benefit to Minnesota.

Many experts have found that this pipeline is not necessary to meet the energy needs of Minnesota or the region, including the experts hired by Minnesota's Department of Commerce - which has taken such a strong position against the project that they filed a lawsuit against the PUC for approving it.

The FEIS modeled spill would reach the St. Louis River estuary - however, the report ignores the dynamic connection between the lake and the estuary. The model shows that a potential spill would coat the estuary in oil, damaging habitats and setting back restoration efforts. The report ignores the wild rice growing in the estuary and the massive investment in the restoration of the estuary.

I ask the PUC to further evaluate the impact that oil spills from additional tar sands transport via Line 3 would have on Lake Superior watershed, St. Louis River and Estuary, and other waterways and to consider the risk of impacting Anishinaabe cultural heritage and wild rice harvesting waters.

As an active citizen working with my neighbors to address the climate crisis we face as a country (and world) I am deeply alarmed that the climate change emissions from this project would cancel out any gains from clean energy initiatives such as 100% renewable energy and the upcoming clean vehicle standards.

Climate change impacts have been estimated at \$287 billion over just 30 years, causing the same pollution as 50 coal power plants. The greenhouse gas emissions from the oil carried by this pipeline alone would surpass the emissions from Minnesota's entire economy on an annual basis.

At this time, when it is critical to reduce our carbon emissions, the new Line 3 would take us in the opposite direction, actually increasing our carbon emissions.

The tar sands in Line 3 is some of the dirtiest oil in the world, and the most difficult to clean when it spills. A National Academy of Sciences report found that cleaning up a tar sands spill in a waterway is much more difficult because it sinks in water and mixes with sediment, and more expensive than cleaning up a non-tar sands spill. Enbridge has a history of spills and greater scrutiny is needed for spill clean-up, permanent damage to waterways and riverbeds, and the threat to Anishinaabe wild rice rights and sensitive ricing waters, including Spirit Lake.

Line 3 would impact hunting, fishing, and gathering rights guaranteed to Anishinaabe people under the 1855 treaty.

In conclusion, the FEIS falls short and the PUC should rule it inadequate and look further at the impacts. When it is time to consider the certificate of need and route permit again, the PUC should deny both permits based on the risks and harms already identified in the record as well as new information from the FEIS.

Thank you for your consideration of these comments.

Jo Haberman

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Provide PPL-15-1371

the docket's number.

*

Leave a comment on the docket. *

Re: Line 3 Replacement Project

We have been made aware that the revised FEIS fails to address the impact an oil spill would have to the Lake Superior watershed and subsequently to the lake. Keeping the Lk Superior watershed clean and healthy should be of utmost importance. There have been multiple mega rain events in the past 20 years; such an event coupled with an oil spill would be disastrous. Minnesota has already experienced the largest inland oil spill caused by the same line 3 on 3/3/91 near Grand Rapids. Consequently, we submit that the Certificate of Need and Route Permits should be denied.

Sandra and Wm Trudeau

RE: Comments on Second Revised EIS on Line 3

PL-9/CN-14-916

PL-9/PPL-15-137

Dear Public Utility Commission Members:

I am a resident of Bemidji, MN, having chosen to retire here almost 3 years ago. I care about the clean water, wetlands and forests of northern MN. And, I care about the quality of the State of Minnesota that we leave for those who follow us. This revised EIS is inadequate and should be deemed so by the PUC.

Before outlining the inadequacies of this revised EIS, I want to share that I am disappointed that the PUC is trying to avoid public engagement by having set the public hearing in Duluth just days before Christmas. And, the short time frame to comment is unfair. The way in which you posted this revised EIS was incredibly difficult to read. And the fact that this is the holiday season, makes it quite difficult for folks to read and comment by January 16th. That deadline should be extended.

This revised EIS fails to evaluate the downstream impacts of spills into the Lake Superior watershed in Wisconsin by limiting the analysis only to Minnesota -- water, like oil spills, does not know state boundaries and those impacts should be weighed. As a recent MN Appeals Court ruling highlighted, nothing in Minnesota's environmental review law limits jurisdiction to projects physically within the state. This has long been included in NEPA and MEPA guidance documents, that being that the pathway a pollutant follows is no respecter of geo-political boundaries. Therefore, impact must be assessed across these artificial boundaries. Yet, the MN DOC EERA refused to consider the adjoining Nemadji watershed in Wisconsin, a component of the St. Louis River Estuary and the Lake Superior watershed. This is wrong and you are obliged to consider this.

Why is the fact that Duluth Harbor is a working harbor relevant? The threat to both the lake and the watershed is just as real.

I also am concerned that this revised EIS uses, in Chapter 10, information about oil floating which appears to be for conventional crude oil, not tar sands oil. Tar sands oil doesn't float. And, the diluent evaporates inside of 24 hours. If Enbridge's technology regarding dilbit has changed such that they can make it float, that information needs to be available for scrutiny.

The Enbridge assertion in the revised EIS that the oil will "resurface" and remain floating after passing through turbulent waters is not even probable, given the nature of dilbit. Please refer to the National Academy of Sciences study: <https://canadians.org/blog/national-academy-science-report-points-dangers-bitumen-spills> and <https://www.nap.edu/catalog/21834/spills-of-diluted-bitumen-from-pipelines-a-comparative-study-of>

For a pinhole leak facing downward, how long would it take to be noticed? The diluent evaporates and the tar sands oil sinks, coating the bottom of wetlands, creek bed, river bed and banks. And, all that happens long before it's discovered.

Moreover, the claim in the revised EIS that there will be "minimal" adhesion of oil to the riverbed and unique riverside topography of the St. Louis River in Jay Cooke State Park and above the FDL dam is not credible. Again, I refer you to the National Academy of Sciences study: <https://canadians.org/blog/national-academy-science-report-points-dangers-bitumen-spills> and <https://www.nap.edu/catalog/21834/spills-of-diluted-bitumen-from-pipelines-a-comparative-study-of>

The tar sands in Line 3 is some of the dirtiest oil in the world, and the most difficult to clean when it spills. Enbridge has a history of spills and greater scrutiny is needed for spill clean-up, permanent damage to waterways and riverbeds, and the threat to Ojibwe wild rice rights and sensitive ricing waters, including Spirit Lake.

Where's the cost analysis on the impact of the spill? Where's the spill impact on the Fond du Lac turbine generating plant? And, where's the financial assurance that Enbridge can get the insurance to cover a catastrophic spill, given its extraordinary debt load? Financial assurance provided to Minnesota must be unencumbered by potential claims from spills in other states.

And, how does Enbridge intend to clean the Jay Cooke State Park's dynamic geologic formations?

Enbridge is currently allowed to hide the composition of its diluents under the term "trade secret". So, how can we assess the analysis in the revised EIS of the impact on water-soluble components of the diluents, especially benzene, to drinking waters? How and when will we discover the carcinogenic components of the diluents?

I don't see a reliable effort to analyze the cumulative impacts of dilbit in the estuary, its fisheries, wildlife, wild rice, aquatic environment, and public riverfront properties.

More worrisome, yet, is the lack of a credible analysis detailing the cumulative impact on Superfund sites in the St. Louis River, where so much money has already been invested in trying to clean up earlier instances of pollution and degradation.

The analysis of the impact of a winter spill is severely limited. With oil under the ice, the 24 hour analysis model expires, compromising clean up and/or mitigation.

There's a similar lack of analysis on wild rice beds in the estuary. "It is assumed that wild rice may be present in shallow-water areas of the St. Louis River Estuary." Well, yes, of course. And, this project is an unacceptable risk to wild rice.

Unlike Michigan Tech's Line 5 study and its list of "tasks," this revised EIS is inadequate as it essentially ignores all but two of these tasks: <https://mipetroleumpipelines.com/document/independent-risk-analysis-straits-pipelines-final-report> <https://mipetroleumpipelines.com/document/independent-risk-analysis-straits-pipelines-executive-summary#>

I also find fault with this revised EIS in that it doesn't seem to have shifted the route for review to that which had been settled on by Enbridge and the PUC a year ago. With the expectation that the new route is that which will be utilized in the request for a Route Permit, it's problematic that this revised EIS doesn't evaluate that route.

Also, I can't find where the revised EIS makes note in the analysis of the Lake Superior watershed about the increasing risks of spills of new oil pipelines. Given the experience in North Dakota recently, the analysis should be considering greater leak probabilities. Spills from causes other than age-related corrosion is very real and generally unrelated to pipeline age. New pipelines may have latent defects that are difficult to detect and my understanding is that new pipelines are typically inspected only once every five years. This much longer inspection interval (than is currently in place by consent decree for the existing Line 3) allows latent materials defects to manifest and also allows other types of damage, such as stray voltage corrosion, to cause leaks before they can be detected and prevented. And, how in the world is Enbridge going to see leaks by aerial inspection in much of the area which was supposed to be studied in this revised EIS? As we know, spills and exposed pipe go unnoticed and unreported until a landowner happens upon it.

This Court-ordered revision to the EIS was required because the original analysis did not include spill modeling for impacts to the Lake Superior watershed, not just Lake Superior. And, this model showed that a potential spill in Little Otter Creek would, within 24 hours, impact the watershed because a spill would reach the St. Louis River.

Yet, this analysis primarily focuses on whether a release of oil would ultimately reach the main body of Lake Superior, and glosses over the impacts to the St. Louis River estuary, a key part of the lake ecosystem that has been a focus of habitat restoration efforts and is already threatened by pollution.

The choice of Little Otter Creek sought to provide a convenient "mitigation" measure. The Fond du Lac dam is downstream of the spill site. But, there's no real certainty about the dam acting as a barrier. In Enbridge's Kalamazoo spill there were two dams downstream. Both were breached. So, we can assume that this dam would be breached, too.

And, why was this one, and only one, location chosen to represent the risk to the Lake Superior watershed? This makes the analysis overly narrow and flawed in the lack of consideration for other locations and for the failure to include an ecological risk assessment. Risky oil spill impacts come from oil spills in many other waterways and in many other scenarios than what was tested. It is short sighted to end the analysis without looking at impacts to the estuary or in other conditions. This analysis ignores the protected wetlands, natural areas, and parks that are along the St. Louis River and the bays and lakes upstream of Lake Superior. Instead, this analysis generalizes them as commercial areas with other industrial uses and therefore not worth evaluating for oil spill impacts.

In conclusion, the revised EIS falls short and the PUC should rule it inadequate. Clearly, the PUC should also deny both the certificate of need and route permits for this project based on the risks and harms already identified in the record as well as new information from this revised EIS.

Sincerely,

Rita Chamblin

Bemidji, MN

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Provide the docket's number. * PPL-15-1371

Leave a comment on the docket. *

The revised FEIS fails to address environmental impacts to the Lake Superior watershed — deny the certificate of need and route permits. There is insufficient protection against a spill. Specific impacts of the spill are not predicted but common sense tells us that a spill would devastate this precious water resource.

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Provide the docket's number. * 14-916/15-137

Leave a comment on the docket. *

The revised FEIS for this project is wholly inadequate. I am a new board member of the St. Louis River Alliance and am very aware of the millions of dollars, and thousands of hours that have gone into restoring the St. Louis River and Estuary from legacy pollution. It is

horrifying to contemplate an oil spill that would reach this stunning and vital body of water--a key part of the Lake Superior ecosystem.

The spill analysis ignores the protected wetlands, natural areas, and parks along the St. Louis River, and does not consider seiche activity that strongly mixes the lake and estuary waters. I am extremely troubled that the spill analysis was done only on a single location with one scenario.

Please further evaluate the impact that oil spills from additional tar sands transport via Line 3 would have on the Lake Superior watershed, St. Louis River and Estuary and on the impacts to Anishinaabe cultural heritage and wild rice harvesting waters.

Thank you,

Dr. Elizabeth Bent

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Provide the docket's number. * PPL-15-1371

Leave a comment on the docket. *

The revised FEIS fails to address spill impacts to the Lake Superior Watershed--deny the

Certificate of Need and
Route permits.
The information on
Spill Impacts to the
Lake Superior
Watershed in the
revised FEIS fails to
recognize the value of
a healthy watershed,
ignores our changing
climate and increasing
precipitation, and fails
to fulfill the MN Court
of Appeals request by
claiming that the
impacts of a spill
cannot be predicted.

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Provide the docket's number. *

15-137

Leave a comment on the docket. *

I am writing to express
absolute opposition to
the FEIS Line 3
Replacement Project.
PLEASE DO NOT approve

this project. This pipeline is not worth the risk to the invaluable fresh water resources through Minnesota. PLEASE. DO NOT ALLOW the FEIS LINE 3 REPLACEMENT PROJECT. PLEASE.

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Provide the docket's number. * 14-916 and 15-137

Leave a comment on the docket. *

“Line 3 Project second revised FEIS Comments”

It has been said that facts do not necessarily rely on human intelligence, but truth does. A truth, our planet is warming far faster than cautious climate scientists had forecast; human emissions of CO₂, a primary factor. Those emissions are increasing when they need to rapidly decrease.

Therefore, in response to a second, third, fourth, fifth or however many revised Final Environmental Impact Statements (FEIS) for replacing Enbridge Line 3, there is nothing adequate that will help decrease emissions other than shutting down the pipeline.

Minnesota can continue to contribute to increased emissions fueling climate change or comprehensively begin the process of rapidly cutting emissions, but we cannot do both.

The Minnesota Public Utilities Commission, Minnesota Commerce Department and the State of Minnesota must bravely step forward to take actions to help return to a livable planet by not intentionally contributing to ever increasing CO2 emissions. The costs are far too great than to do otherwise.

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Provide the docket's number. * 14-916. And 15-137

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Pipelines eventually do leak, new ones also, for example the 8 year old Keystone pipeline has had 3 major leaks and Enbridge is still dealing with a rupture of line 6B in Marshall, Michigan in 2010. How about the largest inland spill in the U.S. in Grand Rapids, MN in 1991...1.7 million gallons. Both the MPCA and the DNR express concerns regarding this Line 3 route and the Dept of Commerce has said it isn't needed, best to remove the old line 3 and that will give plenty of people work. Enbridge has a history of deferred maintenance, fines, deception, and avoidance. Hydrologists have said 215 lakes would be hydrologically connected over the pipelines 340 mile route. Please think about our quality of life, our water, our indigenous people who

constantly getting pipelines crammed down their throats. Save our water and air, save Minnesota.

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Provide the docket's number. * CN-14-916, PP-15-137

Leave a comment on the docket. *

To whom it may concern:

Line 3 is still the wrong choice for Minnesota. The project is not economically viable in the long-term, does not support the necessary transition to renewable energy, and violates indigenous rights. Residents of Minnesota and the Great Lakes should not be forced to assume the public health, environmental and economic risks associated with this project.

I call on the governor and our state agencies to oppose the pipeline project because of the decline in global oil demand and the urgency of the climate crisis, and because we need to support food and water for the long-term. The project does not serve a public purpose.

Sincerely,

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Provide the docket's
number. *

PPL-15-1371

Leave a comment on the docket. *

Dear Public Utilites Commision,

My name is Andrea Eger and I am writing to express my opposition to the Line 3 revised EIS. In this new document, researchers used models to study what would happen if there was a breach in the pipeline in a tributary to Lake Superior. However, the only scenario that was studied was if there was a 10% leak for 24 hours. How can we call this an adequate revision when only one scenario is included?? What happens on a windy day when the leak is more than 10%? Or if it's in a remote area where the leak isn't noticed for a couple days? We need a much more thorough look into these spills if this pipeline is approved.

The revised EIS also ignores protected wetlands, natural areas and parks along the St Loius River. The report generalizes them as "commercial" or "industrial" areas when they are in fact incredibly important habitat for wildlife. These areas are already threatened by pollution so an oil spill might put them over the edge.

Another huge omission from this report is what would happen to the oil that is spilled. Oil industries love to say that the oil will float when in fact we have seen the opposite in many other oil spills. With turbulent water, oil will mix with the water, attach to sediment and sink. Why doesn't this EIS talk about a cleanup plan for this oil? In many other spill sites, there is still oil pieces at the bottom of the riverbeds.

The impact that this pipeline will have on our carbon emissions is immense. The emissions would surpass all carbon emission for the whole state of Minnesota. We are in the middle of a climate crisis and the last thing that we need is more oil extraction.

Please revisit this EIS and take a wider look into the immeasurable way that our climate, water and environment would be effected.

