

Tips for Commenting on the Enbridge Line 3 Project

Thank you for your interest in writing a comment about the Line 3 project, slated to come through Aitkin County, if approved. The Minnesota Dept. of Commerce (DOC) is legally obligated to respond to every submitted comment, so the more substantive questions we submit, the better.

The deadline for comments on the Line 3 Draft Environmental Impact Statement (DEIS) is July 10th. You can submit your comment(s) one of three ways:

- Mail it (must be postmarked by Monday, July 10th) to:

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

- Email it to Environmental Review Manager: pipeline.Comments@state.mn.us

- Fax it to Environmental Review Manager: 651-539-0109

Be sure to include this at the top of your comment: “Public Comment: Line 3 Project (CN-14-916 and PPL-15-137)” or in the subject line.

How to pick a subject to comment on

Because time is very short, I’ve come up with three levels of comments for you to choose from. Pick the one that suits you best and just do that one:

- **Level 1 — Subject Matter Expert** (Please choose this if at all possible): If you are knowledgeable about a specific field (engineering, geography, environment, fish, IT, economics, government, ANYTHING), please find a topic to focus on (see **Tips for Level 1**, below) and provide your expert opinion. Or, look through the Level 2 topics and pick something there if it fits your area of expertise. We need as many of these as possible.
- **Level 2 — Concerned Citizen with a day to spare before July 10th**: If you aren’t particularly expert at anything but are concerned and if you have a few hours to commit to writing a comment, go to **Tips for Level 2**, below. You *might* have to do some light research (internet search or phone calls to various government agencies or your local courthouse, for example — it depends on the topic), but we desperately need people to cover these topics —

so if you have time, please choose this option. (It's okay if more than one person comments on the same topic as each person will provide a different viewpoint and research links.)

- **Level 3 — Concerned but unable to commit time** — If you are pressed for time and just want to email a ready-made comment, please let me know asap (janethillnew@gmail.com), and I will get you something before the deadline. Before you pick this level, please read through the topics for Level 2 — maybe you'll find that you know something about one of those topics and could comment without much research.

For all levels: If you previously submitted anything substantial for the Sandpiper project, resubmit it. They haven't given an indication that they'll consider comments submitted for Sandpiper, even though they pertain to the same route.

Tips for Level 1 (Subject Matter Experts)

There's no time to read all 5,000+ pages of the DEIS — and it's not worth reading anyway, as it's a lot of cut-and-paste filler — so here's a quick way to get to where you need to go:

- Quickly read through the Executive Summary of the DEIS (about 35 pages) to get a feel for what's in the DEIS:

https://mn.gov/commerce/energyfacilities/documents/34079/1.DEIS_Line_3_Executive%20Summary.pdf

While you're reading, keep in mind that this DEIS was prepared in part by an engineering firm with ties to Enbridge. You can see how they point toward an outcome that favors Enbridge — so try to find, in your field, what's missing from their analyses of various routes (e.g., is there a socio-economic analysis of the various routes? Did they consider effects on communities downstream for various routes? etc.). Also, because Enbridge insists that their pipeline begin in Clearwater County and end at Superior (their choice, not ours), consider that their analyses of trucking and rail shipment aren't correct: they would **not** have to run trucks and rail on the same route as the pipeline, so those analyses are based on a false premise.

- Or, skim over the Table of Contents:

https://mn.gov/commerce/energyfacilities/documents/34079/1.DEIS_Line_3_Table%20of%20Contents.pdf

This will give you an idea of what you want to focus on. Just pick one chapter.

Once you've picked your subject to comment on, pick out one issue and just comment on that. Just one substantive and well-researched comment from you will have more impact than you know.

Here's a link to the entire DEIS (in *somewhat* manageable chunks): <https://mn.gov/commerce/energyfacilities/resource.html?Id=34695>.

Tips for Level 2 (Concerned Citizen with a day to spare before July 10)

If you don't have an area of knowledge that you can draw on, pick ONE (only one!) of the items below to focus on, and submit a comment showing what you found when you did a little research. We want to provide them with reliable sources for finding information, so make sure your sources are good ones: science journals, for instance, or government data).

- Oil use is down 9% nationally since 2004, begging the question: do we even need this pipeline? Oil use by Minnesotans is down 14% in the same time period. The Certificate of Need for Line 3 needs to consider the needs of **Minnesotans** for Line 3, not U.S. need. Is there anything in the EIS about Line 3 helping Minnesotans? For this one, one thing you could do is do a Google search to find out which oil companies have already pulled out of the tar sands business, and ask why that information isn't considered in the EIS.
- Many types of carcinogenic solvents (such as Benzene) are required to be mixed with the tar sands to make them flow through the pipes. In the case of a leak, these solvents become absorbed into the water column and carried downstream as the water flows. This is not mentioned in the DEIS. If a pipe leaks into the Big Sandy Watershed, these toxins WILL flow into Big Sandy, and studies have proven that some of the toxins can flow as much as 262 miles downstream. If you can find some information on water flow in the Big Sandy watershed, point them to that and mention the fact that diluents absorbed into the water column will flow downstream. (Add that a pinhole leak will leak 28 barrels per day. The leak material would separate into the solvents which would be absorbed into the water column or evaporated into the air, with the remaining heavier tar sands material sinking to the bottom.) You could also point them to information about diluents in tar sands pipelines — Google searches will bring up a lot about that.
- Ask what Enbridge is doing about cyber-attacks (see Chapter 2 re: their SCADA system). Do some Google research on recent SCADA attacks and point them to that.
- Ask about erosion from abrasion from bitumen hitting the inside of the pipe — do some Google searches and show them where they can find substantive information.

- Ask for more information on the effect of a pipeline on property values in a given area — a Google search will produce sources you can point them to. If you can find information through Aitkin County on property values on Big Sandy Lake, include that.
- The document references information on muskies and trout. A more valuable economic species is walleye, and this species should be covered with much more detail. Do a bit of research to find out where walleye are hatched in Minnesota, and see if the pipeline route could affect this.
- Look up information on taxes generated by fishing in Minnesota (Minnesota government websites should have this — try looking up Minnesota tourism). It's possible these taxes and fees far exceed anything Enbridge is promising, in addition to our fishing industry being hurt if there is a spill.
- There is little about the Mississippi River in the DEIS. What would be the impact of a leak from Line 3 on the communities downstream, especially those communities that obtain their drinking water from the Mississippi (such as the Twin Cities).
- Read through the MEPA rules (<https://www.revisor.mn.gov/rules/?id=4410&view=chapter#rule.4410.2300> — they're all presented on the same page at this link) and point out various requirements for the EIS that they need to comply with. They need to know we know.
- Do a bit of research about the effect of high-voltage lines and induced charge on pipelines in wetlands. The pipeline will be co-located along power lines in much of Aitkin County.
- Check to see how many times Enbridge has contested its tax payments to counties. They are currently headed to court to take back payments to several MN counties, and are saying that this is a new thing — but apparently they have challenged their tax payments before. We need someone to research this. Taxes and jobs are they only things Enbridge is offering as a benefit to Minnesota. They admit there will be NO permanent jobs in Minnesota with Line 3. And if they keep asking for reimbursement of their tax payments from counties, the “benefit” far outweighs the risks to Minnesota.
- If Minnesota chooses to be a “sacrifice” state, we need to seriously consider Alternative Route SA-04 (see Executive Summary https://mn.gov/commerce/energyfacilities/documents/34079/1.DEIS_Line_3_Executive%20Summary.pdf), which runs past lakes that have been deemed “unsalvageable”. Why sacrifice our cleanest lakes? (You can find maps of clean lakes at friendsoftheheadwaters.org)
- Look into possible conflict of interest (i.e., the engineering firm Cardno, with a known link to Enbridge, preparing much of the DEIS), in which the results of studies (and DEIS preparation) are skewing the results in favor of what Enbridge wants the public to believe. According to

Michigan Attorney General Bill Schuette in a 6/21/17 news release: “The evaluations of Line 5 were supposed to be independent, not tainted by outside opinions or information, but that’s not what happened. Instead, our trust was violated and we now find ourselves without a key piece needed to fully evaluate the financial risks associated with the pipeline that runs through our Great Lakes, this is unacceptable.” Here are some links:

<http://grangehallpress.com/Enbridgeblog/2017/06/21/breaking-another-enbridge-screw-up/?t=1&cn=ZmxleGlibGVfcmVjcw%3D%3D&iid=217e94677dc24b52888c0e9f15e90e3b&uid=3052200409&nid=244+276893704>

<http://www.freep.com/story/news/2017/06/21/michigan-straits-mackinac-oil-pipeline-safety/415527001/>

<http://woodtv.com/2017/06/21/state-line-5-risk-analysis-team-member-also-worked-for-enbridge/>

Tips for Level 3 (Concerned Citizen with no time to spare before July 10)

All you need to do is be available and able to send an email to the DOC before 4:00 p.m. on Monday, July 10th. I’ll send you something by that time to email, but it will take that long for me to come up with something.