



**HUBBARD COUNTY HC COLA**

**P.O. BOX 746**

**PARK RAPIDS, MN 56470**

[www.HubbardCOLAmn.org](http://www.HubbardCOLAmn.org)

[HCCOLAmn@gmail.com](mailto:HCCOLAmn@gmail.com)

May 15, 2016

Jamie MacAlister  
Environmental Review Manager  
Minnesota Department of Commerce  
85 7<sup>th</sup> Place East, Suite 500  
St. Paul, MN 55101

Re: PUC Docket Numbers - Sandpiper: PL- 6668/CN-13-473 and PPL-13-474  
Line 3: PL-9/CN-14-916 and PPL-15-137

Dear Ms. MacAlister:

Hubbard County Coalition of Lake Associations ("HC COLA") is a coalition of 29 lake associations and their approximate 2,100 members that represent 37 lakes in Hubbard County. HC COLA's mission is to protect and enhance the quality of our lakes and rivers, preserve the economic, recreational and natural environmental values of our shore lands and promote the responsible use of our waters and related habitats. HC COLA's mission enhances, promotes and protects the interests of lakeshore property owners, lake associations, local government, the general public and future generations.

HC COLA has the following comments and recommendations regarding the Public Utilities Commission's scoping for the Environmental Assessment Worksheet (EAW) and Environmental Impact Study (EIS) for the Sandpiper and Line 3R pipeline projects.

***Our goal is to insure that the EIS for the Sandpiper and Line 3R oil pipelines crossing Minnesota fully comply with all State laws and provides for the highest level of protection of its natural resources.***

Hubbard county is blessed with an abundance of natural resources, and is especially noted for its clean lakes and rivers. The proposed route of the Sandpiper and Line 3R pipelines, if approved, would carry over 1.1 million barrels of dirty, explosive crude oil per day across this pristine environment. A spill in this area would be catastrophic to its land, waters, wildlife and inhabitants.

Since the PUC has never completed an EIS for an oil pipeline, HCCOLA is respectfully requesting you to seriously consider the following suggestions enabling a thorough, comprehensive review.

The membership of HCCOLA request the following:

1. The Memo of Understanding (MOU) with the MN Department of Natural Resources (DNR) and the MN Pollution Control Agency (PCA) should be strengthened by the inclusion of specific provisions and tasks that turn potential assistance and oversight into actual assistance and oversight. Currently marginalized by the Department of Commerce, scientists, specialists and managers at the MPCA and the MN DNR should have active opportunities to monitor and supervise the EIS.
2. As authorized by MEPA, we request the establishment of an expert panel to provide oversight and assistance with the scientific, economic, technical and procedural aspects of EIS scoping.
3. Any outside consultant contracts used in the EIS scoping should be awarded based on an open, unbiased bid procedure.
4. All "system alternative routes" submitted for this pipeline corridor should be included and compared in the EIS analysis.

Thank you for considering HC COLA's comments and recommendations. If you have any questions or want to discuss these matters further, please contact Lynn Goodrich at [tripplake1@mac.com](mailto:tripplake1@mac.com).

Hubbard County COLA



Lynn Goodrich  
President