

HUBBARD COUNTY HC COLA
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September 25, 2015

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

Re: PUC Docket Numbers PL-9/CN-14-916 and PL-9/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 consideration of Enbridge Energy, Limited Partnership (Enbridge) Applications for the Line 3 Pipeline Replacement Project Certificate of Need PL-9/CN-14-916 and Route Permit PL-9/PPL-15-137 (the "Line 3 Project"):

1. HC COLA's Position regarding the Line 3 Project is as follows:
 - a) HC COLA is not opposed to the need for the Line 3 Project or pipelines in general if the need for the pipeline is established by satisfying all the criteria under Minnesota Law and Rules.

b) HC COLA is opposed to Enbridge's proposed route of the Line 3 Project and System Alternative SA-03 Modified as defined in the Sandpiper Project proceedings (PUC Docket PL-6668/CN-13-473) because of the potential significant adverse environmental, human and economic effects of those routes.

c) HC COLA recommends that system alternatives that avoid or minimize the potential for significant adverse environmental, human and economic effects be considered as part of the Line 3 Project, including, but not limited to, SA-03, SA-04, SA-05 and SA-06 as defined in the Sandpiper Project proceedings (PUC Docket PL-6668/CN-13-473).

d) The PUC must conduct an Environmental Impact Statement ("EIS") regarding the Line 3 Project as required by the Minnesota Court of Appeals decision filed on September 14, 2015 in the Matter of the Application of the North Dakota Pipeline Company LLC for a Certificate of Need and a Pipeline Routing Permit for the Sandpiper Pipeline Project in Minnesota (the "Sandpiper Project").

2. The potential significant adverse human, environmental and economic impacts caused by the Line 3 Project must be studied in an EIS, which will include, but not be limited to:

a) The construction, maintenance and potential leaks or spills of the pipeline on Enbridge's proposed route and SA-03 Modified could cause significant and devastating environmental damage to the lakes, rivers, wetlands, trout streams, aquifers, groundwater, drinking water, and agriculture. Also, there could be significant impacts on wildlife, fish and marine life, aquatic vegetation, and the spread of aquatic invasive species. In the event of a leak or spill, the loss of use of the lakes and rivers for recreation, as well as the negative economic impact on tourism revenue, local businesses that rely on tourism revenue, lakeshore property values, and Hubbard County property tax dollars would have a significant adverse human and economic impact.

b) A comparison of the adverse impacts that could result from a leak or spill along the various routes being considered for the Line 3 Project, including the routes described in 1 (b) and (c) above.

c) The need, cost and timing for providing personnel, training and equipment for fire departments, first responders and other critical personnel in order to respond in the most efficient and effective way under the best practices to a leak, spill, fire or other damage causing event along each of the routes under consideration, including the routes described in 1 (b) and (c) above in order to mitigate damage.

The need and cost should be determined over the life of the pipeline and a comparison of all of the routes under consideration should show how much of the costs will be paid for by Enbridge and the source and security of its funding and what cost are left to be paid for by the state, counties, townships, cities and others.

d) The unique significant adverse environmental, human and economic impacts caused by Tar Sands, including, but not limited to, the fact that Tar Sands oil sinks in lakes and rivers making it very expensive and difficult to clean up in the event of a leak or spill and in many situations the damage may be irreversible. This is evidenced by Enbridge's 30-inch pipeline carrying Tar Sands oil which ruptured on July 27, 2010 in Michigan, spilling an estimated at 843,000 gallons. Residents were evacuated (many never returned) and this river, while eventually reopened for recreation, was altered forever.

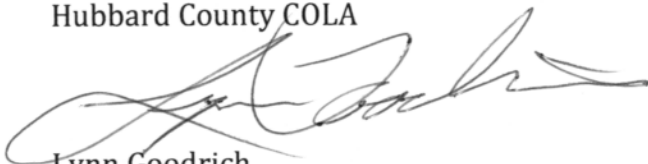
e) The cumulative adverse effect of the proposed Sandpiper Project and the Line 3 Project in the proposed or alternative pipeline corridors under consideration.

f) The comments of the MDNR and MPCA regarding the Sandpiper Project (received 1/23/2015 PUC Docket PL-6668/CN-13-473) including Enbridge's proposed route apply to the Line 3 Project and should be included in the EIS.

g) Use a method to evaluate the comparative significance or importance of the impact and/or the relative lost value of the target environmental resource from the construction, maintenance, operation, leak or spill or other impact of the various routes under consideration. All impacts on target environmental resources are not equal and should not be treated as equal as the DOC did in its "environmental report."

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.

Hubbard County COLA



Lynn Goodrich
President