

James Conniff

I am commenting on the draft 401 water quality certification, draft National Pollutant Discharge Elimination System/State Disposal System wastewater permit, and draft capped air emission permit application for the proposed Line 3 pipeline project. I am deeply concerned about the pipeline's impacts and believe that these permits must be denied.

As a physician, I am particularly concerned about the impact of this project on water quality and climate change, which have direct effects on human health. The draft of the 401 permits states that this project will inevitably degrade high-quality waters and, by law, the MPCA cannot approve a project that degrades waters of the state unless the agency finds the project has enough 'social and economic benefits' to offset this degradation. The proposed 401 permit does not account for net social costs and economic benefits. The Minnesota Department of Commerce has consistently maintained that the project does not carry enough potential benefits to outweigh its flaws. The MPCA must do its own accounting of costs and benefits rather than abdicating its authority in this regard to the Public Utilities Commission's split decision, where even the commissioners could not reach consensus on the overall need for the project.

It is vital that the MPCA evaluate this pipeline from the standpoint of public best interest rather than corporate profits, as the agency's mission is to protect and improve the environment and human health. The preeminent threat to the environment and human health is climate change. Line 3 would carry a climate impact of 193 million tons of CO₂ per year, more than Minnesota's entire economy, for a 30-year social cost of \$287 billion. A warming and destabilized world poses grave risks to the integrity of our rivers, lakes, and streams.

Over 11,000 acres of wetlands are connected to the pipeline route and could be permanently degraded, and yet Enbridge only reported about 300 acres in their application. The MPCA must follow the requirements of the Minnesota Environmental Policy Act, as it declares that projects that cause significant damage to the environment should not be permitted. With the predicted number of leaks and spills over the lifespan of Line 3 that will inevitably result in damage to streams, wetlands, lakes, and aquifers, the impact will be widespread.

An oil spill would not only ruin water quality, it would negatively impact our drinking water, our critical aquatic and riparian habitats, and the sacred wild rice beds and other food sources that are central to the lives and livelihoods of Indigenous people. The FEIS states that adverse impacts of this project fall disproportionately on Native communities, which is incompatible with MPCA's stated commitment to environmental justice.

I am opposed to the blatant disregard for the pipeline's toxic contents and its potential danger for spills, as drinking water from St. Cloud to Minneapolis is sourced from the Mississippi River. These waters are secured downstream of pipeline crossings and are not mentioned in the draft permit.

The proposed Line 3 project is incompatible with certification under section 401 of the Clean Water Act. In order to uphold the MPCA's mission to protect and improve the environment and human health, the 401 certification and other permits under consideration must be denied.

If the agency is unwilling to deny the permits at this time, then I petition the MPCA for a contested case hearing on the 401 certification and the NPDES permit, to address the issues of net societal costs and benefits that are not fully developed in the record, including the MPCA's failure to do its own accounting of these costs and benefits, as well as a need for updated oil market analysis in light of rapidly changing oil prices. This would allow for the introduction of expert testimony to inform a determination consistent with the requirements of the Minnesota Environmental Policy Act.

Joshua Colton

I am commenting on the draft 401 water quality certification, draft National Pollutant Discharge Elimination System/State Disposal System wastewater permit, and draft capped air emission permit application for the proposed Line 3 pipeline project. I am deeply concerned about the pipeline's impacts and believe that these permits must be denied.

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Joshua Colton, MD
Minnesota Gastroenterology MNGI

Dorie Reisenweber

Dear MPCA:

I urge you to deny the following permits for the proposed Enbridge Pipeline 3 project: The draft 401 water quality certification; The draft National Pollutant Discharge Elimination System/State Disposal System wastewater permit and the draft capped-air emissions application. If you cannot, then please order a contested case hearing.

The draft 401 water quality itself states that the Line 3 project will reduce high-quality waters. According to law, the MPCA can NOT approve such a project unless societal and economic benefits offset the degradation. The MN Dept. of Commerce has been clear that Line 3 does NOT offer enough benefits to make up for Line 3's potential harm. Has the MPCA conducted its own evaluation of the harmful impacts to people? Those include harm and even devastation of wild rice beds and fish, not to mention medicinal plants on which many indigenous depend.

\$287 BILLION would be the social cost over a thirty-year period. That is over \$9 BILLION a year. Would Minnesota's budget be able to pay for that amount? The climate warming due to the added carbon dioxide puts our waters, our environment---our lives at grave risk.

Although over 11,000 (eleven thousand) acres of wetlands are along Line 3's route and would be impacted, only 300 (three hundred) acres are reported in the Enbridge application. That is a gross understatement, if not a deliberate oversight. Eleven thousand acres of wetlands exceeds Minnesota's own Environmental Policy Act. The permit should be denied.

Any oil spill would significantly negatively impact water quality including drinking water, plant and animal habitat and indigenous food sources. According to the FEIS such impact would fall unevenly on the indigenous. That does not align with the MPCA's mission of environmental justice.

Consider Line 3's pumping of toxic, diluted bitumen and tar sands, as well as, the history of and risks of ruptures and spills this line would present to the Mississippi River between St. Cloud and the Twin Cities. Both areas' populations lie downstream of Line 3's numerous water crossings and depend on the Mississippi for drinking water. Is that mentioned in the draft permit? For that matter, consider the risk to the waters at and along the route to Duluth and Superior. Would the MPCA consider that very real danger to their drinking water?

For the previous reasons it is clear that the Enbridge Line 3 project does not meet the clean Water Act's 401 water quality certification requirements. I implore the MPCA to act in accordance with the agency's mission to protect human and environmental health. Deny the 401 water quality certification application and the other permits associated with Line 3. If the MPCA is unable to deny Line 3 permits, then exercise your purview and order a contested case hearing.

Thanking you for weighing these concern.

Sincerely,

Doretta (Dorie) Reisenweber 101 West Kent Road Duluth, MN 55812

Dorie Reisenweber

To: Minnesota Pollution Control Agency

The Mn Dept. of Commerce declared, Pipeline 3 is not needed. I urge you to study the public comments and to deny Line 3 CWA 401 water quality permits, in fact deny all of Enbridge's Line 3 permit applications. Please base your decision on facts, not the length of time the study took, the money spent on it or the jobs promised. Please act upon facts and the MPCA's mission to protect the health of the public and the environment.

In February of 2020, Canada's largest tar sand project, the Teck Mine, was abandoned. In fact, TECK CEO Don Lindsay wrote: "It is now evident that there is no constructive path forward for the project. Questions about the societal implications of energy development, climate change and indigenous rights are critically important ones for Canada, its provinces and indigenous governments to work through."

<https://globalnews.ca/news/6588026/teck-frontier-oilsands-mine-cancelled>

The same holds true in Minnesota. How is pumping Canadian tar sands oil through Enbridge Line 3 any different, except that it is routed through and puts at certain risk from leakage or rupture of the pipeline Minnesota's precious wetlands, river and streams? Can Minnesota's water-rich environment afford a few Kalamazoo disasters here and there? I think not.

Suncor the world's largest producer of bitumen cut production, while the price of tar sands oil dropped to as little as \$ 5 (five dollars) a barrel. At that price what company can afford to operate profitably much less be able to afford to employ the standards of safety and quality that Enbridge advertisements suggest it will adhere to despite Enbridge's history of pipeline breaks?

Last month the Husky Refinery in Superior, Wisconsin, postponed its repair and rebuilding project after the refinery's 2018 explosion. Meanwhile the world's oil market collapses and more and more refineries throughout the world are limiting operations or shutting down entirely.

The price of tar sands oil is at \$ 7 a barrel, but the cost to extract it is \$ 82 per barrel. There is no profit to be made, yet grave and irremediable harm is done to the atmosphere by tar sands extraction. Why permit a dying, dangerous and unneeded pipeline such as Enbridge Line 3?

<https://www.cbc-co/news/business/bitumen-wcs-wti-oil-1.5511386>

If Line 3 were to run as planned, tar sands extraction emissions would be equal to 50 new coal plants running around the clock, 365 days a year. Every year! Today Minnesota has four coal plants. Surely the MPCA does not think the emissions of 50 new coal plants, even though emissions would arise over Canada, that Minnesota would maintain our state's current and enviable clean air standards. There is no wall to stop Canadian tar sands emissions destroying the atmosphere. Would the MPCA ignore its mission to protect the environment to pander to Enbridge and thus being an accomplice to the deadly fossil fuel industry's destruction of the earth's atmosphere?

Pipeline companies are asking producers to cut back, because storage tanks are getting full. Why

then, would the MPCA consider allowing Line 3 to go forward? Does it seem wise to bring to Minnesota the extra 4,300 pipeline workers during this downturn in demand, while oil prices crash, the world population hurtles toward 10 billion, the climate is in constant upheaval and the COVID pandemic rages? Minnesota's health care system is already overburdened as are other systems throughout this state and others. Why would the MPCA consider granting Line 3 any permits which would increase the environmental and health problems Minnesotans face? I urge the MPCA to deny the CWA 401 water quality permit. In fact, deny all Line 3 permits for the sake of Minnesota's future well-being, and, if the MPCA cannot, please order a contested case hearing.

Thank you for factoring in these concerns as you weigh your decision.

Sincerely,

Doretta (Dorie) Reisenweber 101 West Kent Road Duluth, MN 55812

Michelle Thelen

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