



HUBBARD COUNTY COLA
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March 27, 2014

Larry Hartman
Environmental Review Manager
Environmental Review and Analysis (EERA)
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101

Re: Public Utilities Commission (PUC)
Docket Number PL-6668/PPL-13-474

Dear Mr. Hartman:

Hubbard County Coalition of Lake Associations (COLA) is a coalition of 29 lake associations in Hubbard County that represent 37 lakes and approximately 2,100 people that are members of those lake associations.

COLA's Board of Directors (consisting of the 29 member lake associations) approved this letter at the March 27, 2014 meeting.

COLA has the following three requests regarding the application by Enbridge Energy Limited Partnership and North Dakota Pipeline Company (collectively, Enbridge) to construct its proposed Sandpiper Pipeline as described in the above referenced Docket No. (Project):

- 1. Extend to August 1, 2014 the public comment period, including the opportunity to propose alternative routes or route segments.**

Enbridge has failed to date to provide answers to a number of critical issues raised by the public. The public needs Enbridge's answers to these critical issues so that they will have all of the available information before they provide their final comments on the Project, including alternate routes or route segments.

Examples of some of these critical issues that Enbridge has not addressed include (i) the exact location of the proposed pipeline; (ii) the number and exact location of the additional valves Enbridge said it would provide for additional protection in the sensitive areas of the rivers, lakes and wetlands; (iii) nature, amount and protection of the assets set aside to cover direct and indirect public and private costs of a leak or spill; (iv) providing accurate information about safety statistics; and (v) the additional impacts and critical issues resulting from the new information that Enbridge may use the route for the Project for the replacement and relocation of its Line 3 which new information (i) amounts to a substantial amendment to its application and (ii) is contrary to Enbridge's documents which provide that it has no plans for any other use of the pipeline route than the Sandpiper Pipeline. This conduct by Enbridge has frustrated not only the public and local governmental authorities regarding having adequate time to provide comments by April 4th, but also the various agencies involved in reviewing the Project.

Finally, since a large number of the property owners that live along or near the general route of the Project and the Project's sensitive areas, such as the rivers, lakes and wetlands are seasonal residents (typically from May to September), they have not had the opportunity to participate in the informational and public meetings/hearings because they have been held when those people are no longer "at the lake." The seasonal residents should not be denied the right to obtain all of the information and participate in the meetings/hearings just because Enbridge selected timing that was advantageous to it.

2. Conduct additional public information meetings and hearings during June and July, 2014.

These additional meetings are needed to address the concerns set for the in paragraph 1 above.

3. Require that an Environmental Impact Statement (EIS) be prepared for the Project.

Pipelines, like energy facilities, should be located compatible with environmental preservation and efficient use of resources. Minnesota law requires that "An EIS shall be ordered for projects that have the potential for significant environmental effects".

COLA cannot imagine a project that has more potential for "significant environmental effects" than this Project. The potential impacts of a leak or spill from this Project on the Headwaters rivers, lakes which are some of the clearest and cleanest in Minnesota, wetlands and the Straight River aquifer which is shallow and in sandy porous soils, all of which are extremely vulnerable, could be devastating. An EIS is required for the Project because these highly sensitive, unique and valuable resources of the state deserve the highest level of scrutiny.

Thank you for considering our requests. If you have any questions or want to discuss COLA's request, please call Dan Kittilson at 218-732-5566.

Hubbard County COLA



By: _____

Dan Kittilson
President