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February 27, 2018

Scott Ek  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101

**Re: Line 3 Project Revised Final EIS Comments**

**In the Matter of the Application of Enbridge Energy, Limited Partnership, for a Certificate of Need for the Line 3 Replacement Project in Minnesota From the North Dakota Border to the Wisconsin Border, OAH 65-2500-32764, MPUC PL-9/CN-14-916**

**In the Matter of the Application of Enbridge Energy, Limited Partnership for a Routing Permit for the Line 3 Replacement Project in Minnesota From the North Dakota Border to the Wisconsin Border, OAH 65-2500-33377 MPUC PL-9/PPL-15-137**

Dear Mr. Ek:

Honor the Earth hereby submits the following comments on the Revised Final Environmental Impact Statement (“RFEIS”) prepared pursuant to the Minnesota Environmental Policy Act, Minn. Stat. Ch. 116D (“MEPA”) for the Line 3 “Replacement” Project (“Project”) proposed by Enbridge Energy, Limited Partnership, (“Enbridge”) in response to the Minnesota Public Utilities Commission (“Commission”) Notice of Availability and Comment Period for the Revised Final Environmental Impact Statement on the Line 3 Replacement Project, issued on February 12, 2018, which notice established a comment period ending on February 27, 2018, in the above captioned dockets. The Commission is the responsible governmental unit (“RGU”) that is ultimately responsible for preparing an adequate Environmental Impact Statement (“EIS”) under MEPA.

Honor the Earth finds that the RFEIS is inadequate. As does its predecessors, the DEIS and FEIS, the RFEIS fails to comply with the requirements of MEPA as described in Honor the Earth’s January 10, 2017, Comments on the Draft EIS; October 2, 2017, Comments on the FEIS,

and November 31, 2017, Exceptions to the Report of the Administrative Law Judge on the Adequacy of the FEIS, all of which are hereby incorporated by reference.

With regard to the Tribal Culture Properties Survey (“TCP Survey”), to be “adequate” the Commission must find that the Revised FEIS “addresses the potentially significant issues and alternatives raised in scoping so that all significant issues for which information can be reasonably obtained have been analyzed in conformance with part 4420.2300, items G and H.” The Revised FEIS fails to address the potentially significant impacts on tribal cultural properties which would result from the proposed project and its alternatives. The requirement that the RFEIS not include the results of a full TCP Survey continues to violate MEPA for the reasons contained in Joint Tribal Petition to Reconsider and Amend the PUC’s December 14 Order.

The RFEIS requirement that the TCP Survey be completed before construction but not before a Commission decision means that the TCP Survey is both not sufficiently significant to be required for inclusion in the RFEIS, yet absolutely required before construction. The Commission’s determination is self-contradicting. On the one hand, the Commission has agreed that potential impacts to Tribal cultural properties are likely to be significant and that the information in the TCP Survey is important and necessary to protect Tribal cultural properties, to the point that the Commission has ordered that construction of the Project may not commence until completion of the TCP Survey. On the other hand, the Commission has also determined that it is not necessary for the Commission itself to know this information before it makes a decision on the Project. Such position is illogical and irrational.

The purpose of scoping is in part to ensure “identification of necessary studies requiring compilation of existing information or the development of new data that can be generated within a reasonable amount of time and at a reasonable cost.” Minn. R. 4410.2100, subp. 6(G). The potential for the Project to impact Tribal cultural properties has been known to the Commission for years. Moreover, MEPA is precise with regard to the Commission’s options for including data needs identified during scoping:

Data and analyses shall be commensurate with the importance of the impact and the relevance of the information to a reasoned choice among alternatives and to the consideration of the need for mitigation measures; the RGU shall consider the relationship between the cost of data and analyses and the relevance and importance of the information in determining the level of detail of information to be prepared for the EIS. Less important material may be summarized, consolidated, or simply referenced.

Minn. R. 4410.2300(H) (Emphasis added). Here, the Commission has admitted that the TCP Survey contains important relevant data regarding the impacts of the Project and its alternatives, and it has also determined that this information is needed with regard to mitigation measures. In this case, MEPA requires that the Commission weigh the cost of the data against its relevance and importance. MEPA states that cost is the only factor relevant to the Commission's decision about whether or not to include data. Here, the fact that the Commission ordered completion of the TCP Survey means that the Commission may not claim that the cost of the TCP Survey outweighs its "relevance and importance." Minn. R. 4410.2300(H) does not allow data to be excluded from an EIS merely because it was prepared too late to meet the Commission's schedule. If an EIS is properly scoped and planned, then late data acquisition should not happen.

Further, Minn. R. 4410.2300(H) states that "less important material may be summarized, consolidated, or simply referenced." It does not allow the Commission to exclude important data. Even if the TCP Survey could be categorized as "less important," is it logically not possible for the Commission to summarize, consolidate, or reference data that does not yet exist.

With regard to incomplete or unavailable information, Minn. R. 4410.2500 states:

If information about potentially significant environmental effects is essential to a reasoned choice among alternatives and is not known and the cost of obtaining it is excessive, the information cannot be obtained within the time periods specified in part 4410.2800, subpart 3, or the means to obtain the information are beyond the state of the art, the RGU shall include the following information in the EIS:

- A. a statement that the information is incomplete or unavailable and a brief explanation of why it is lacking;
- B. an explanation of the relevance of the lacking information to evaluation of potentially significant environmental impacts and their mitigation and to a reasoned choice among alternatives;
- C. a brief summary of existing credible scientific evidence that is relevant to evaluating the potential significant environmental impacts; and
- D. the RGU's evaluation of such impacts from the project and its alternatives based upon theoretical approaches or research methods generally accepted in the scientific community.

In turn, Minn. R. 4410.2800, subp. 3, states:

The determination of adequacy of the final EIS shall be made at least ten days after publication in the EQB Monitor of the notice of availability of the final EIS. The determination of adequacy of the final EIS shall be made within 280 days after the preparation notice was published in the EQB Monitor unless the time is extended by consent of the proposer and the RGU or by the governor for good cause.

(Emphasis added). Thus, MEPA identifies three exceptions to its general rule that an RGU must acquire needed data. An RGU may fail to include data when and only when:

- 1) “the cost of obtaining it is excessive;”
- 2) “the information cannot be obtained within the time periods specified in part 4410.2800;”  
or
- 3) “or the means to obtain the information are beyond the state of the art.”

Where these specific circumstances exist, an RGU may make the findings contained under paragraphs A through D of Minn. R. 4410.2500. If these circumstances do not exist, MEPA does not allow an RGU to avoid data acquisition. These limited exceptions are consistent with the intention of MEPA to require comprehensive environmental analysis. Broader exceptions would allow an RGU to simply fail to acquire data for any reason and then later justify its failure, thereby opening a massive loophole in MEPA that would void all of the MEPA scoping and EIS preparation requirements that relate to data acquisition.

None of these exceptions exist. With regard to the first and third exceptions, since the survey will be completed, it must be assumed that its cost will not be excessive and that completion of the TCP Survey is not beyond the state of the art. With regard to the second exception, the 280 day deadline has already been extended, and in any case, the Governor may unilaterally extend this deadline without the consent of Enbridge, such that it is possible for the TCP Survey to be completed within regulatory timeframes. The language of the regulation makes clear that the 280-day deadline may be extended “by consent of the proposer and the RGU” or “by the governor,” the plain language of which means that the deadline may be extended by either the RGU and a project proposer together, or by the Governor for good cause. Therefore, the law does not allow the State of Minnesota to complete the TCP Survey before a final decision, because doing so would be “for good cause.”

While knowledge of Tribal cultural properties would be a necessary element in any mitigation efforts by Enbridge, should the Project be approved, the data and information that

would be contained in the TCP Survey is also relevant to the Commission’s decision on the merits of the Project and its alternatives, such that its usefulness may not be limited to just mitigation. The Commission asserts that treating the TCP Survey as only a mitigation measure is a reasonable outcome given that it failed to collect this information in a timely fashion. This reasoning is fallacious because it does not excuse the Commission’s duty under MEPA to acquire information that “can be reasonably obtained” within regulatory timeframes. The information in the TCP Survey can be and is being reasonably obtained and is relevant and critical to the Commission’s decision making process, such that good cause exists to extend the regulatory deadline. Therefore, MEPA does not allow the Commission to limit the utility of this information exclusively to Enbridge’s mitigation efforts. The Commission cannot fail to properly plan its MEPA review as it relates to tribal cultural properties and then accommodate its own failing by treating critical information as being relevant only to mitigation.

Moreover, the February 27, 2018, letter from the Minnesota Department of Human Rights (“MDHR”) to the Commission, asserts that the TCP Survey “should be completed before the approval of the Final EIS” because failing to complete the TCP Survey before the Commission’s decision on this matter means that the Commission will not “sufficiently addresses Tribal rights and needs.” MDHR also states that “conducting the survey prior to approval of the Final EIS will ensure that the state fully considers all potential risks and impacts that a pipeline could have going through and around Tribal reservations and treaty protected territories.” It therefore follows that not conducting the survey would mean that the State of Minnesota would not ensure full consideration of the impacts of the Project on indigenous peoples, thereby violating their human rights. The MDHR is further evidence that good cause exists to extend the 280-day deadline to allow completion of the TCP Survey.

## **SUMMARY**

For the foregoing reasons, Honor the Earth asserts that the Commission may not find the RFEIS to be adequate pursuant to Minn. R. 4410.2800, Subp. 4. Therefore, Honor the Earth requests that the Commission find the RFEIS inadequate and order that:

- 1) a full TCP Survey be completed;
- 2) a revised or supplemental RFEIS be prepared for public and party comment and subsequent reviewed by the Commission that includes the results of the TCP Survey;
- 3) a comment period on the adequacy of such revised or supplemental RFEIS be provided;

- 4) the comment period on the above captioned dockets be reopened so that the public have an opportunity to use this information in their comments on the Project; and
- 5) a supplemental briefing period be provided, so that the parties may incorporate the information in the TCP Survey in their briefs.

Respectfully submitted,

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**STATE OF MINNESOTA  
PUBLIC UTILITIES COMMISSION**

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**In the Matter of the Application of Enbridge Energy, Limited Partnership, for a Certificate of Need for the Line 3 Replacement Project in Minnesota From the North Dakota Border to the Wisconsin Border**

**OAH 65-2500-32764  
MPUC PL-9/CN-14-916**

**In the Matter of the Application of Enbridge Energy, Limited Partnership for a Routing Permit for the Line 3 Replacement Project in Minnesota From the North Dakota Border to the Wisconsin Border**

**OAH 65-2500-33377  
MPUC PL-9/PPL-15-137**

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**CERTIFICATE OF SERVICE**

I, Paul Blackburn, hereby certify that I have this day, served a true and correct copy of the following documents for the above captioned matters to all persons at the addresses on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail at Minneapolis, Minnesota.

**HONOR THE EARTH COMMENTS ON LINE 3 PROJECT REVISED FINAL EIS**

Dated this 27<sup>th</sup> day of February, 2018.

/s Paul Blackburn  
Paul Blackburn

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