



June 26th, 2017

Jamie Macalister
Environmental Review Manager
MN Department of Commerce
85 7th Place East, Suite 280
Saint Paul, MN 55101-2198

Re: Line 3 Project Draft EIS Comment, specifically regarding Chapter 8 "Existing Line 3 Abandonment and Removal"

Dear Ms. Macalister,

We understand that Enbridge has filed a proposed abandonment plan per PHMSA regulations. We also understand, per the D-EIS, that Enbridge has filed with the Minnesota PUC a draft of the required plan that specifically show how the PHMSA abandonment regulations will be achieved. According to Enbridge, abandonment will include: removing the oil, cleaning the pipeline, disconnecting the pipeline, segmenting the pipeline, and monitoring and maintaining the pipeline, indefinitely. As Grand Rapids City Council Members, we would like you to consider how the proposed existing Line 3 abandonment will affect our City based on information provided in the Line 3 Project D-EIS. From 8.3.1 of the D-EIS, **Potential Impacts and Mitigation Measures: Leaving Existing Line 3 in Place Could Have Potentially Significant Effects:**

There are, however, some potentially significant impacts associated with abandoning the existing Line 3. These longer term impacts are caused by the continued presence of undiscovered legacy contamination that may exist surrounding the existing pipeline, as well as the potential hazards associated with the aging of the abandoned pipe. These impacts include soil and water contamination, the ability of the pipeline to serve as a water conduit, subsidence due to the failure over time of the pipeline, and loss of buoyancy control for the pipeline. (8.4)

The existing Line 3 runs through the NW part of Grand Rapids' Wellhead Protection Area (WHPA). A Wellhead Protection Area (WHPA) is the Minnesota Department of Health (MDH) approved surface and subsurface area that surrounds a public water supply well (or well field) that supplies a public water system, through which contaminants are likely to move toward and reach the well or well field. According to the D-EIS, "Soils and waters near the abandoned Line 3 could also be adversely affected where undiscovered contamination along the existing pipeline (from lubricants, process chemicals, and oil spills) are left behind.

Potential impacts on soil and water resources are highly uncertain; however, as they depend on the extent of the existing undiscovered contamination.” (8.6)

We understand from the D-EIS that the current Line 3 is in grave condition and the concerns of accidental release having “the most exposure” is in keeping the existing Line 3 in place. It remains unclear as to how a deteriorated Line 3 would handle the removal of the oil, cleaning, disconnecting, and segmenting of the pipeline, as proposed. There is no specific plan within the D-EIS that states how Enbridge will manage a contaminated site other than “Enbridge has indicated that it would....” (8.12).

The City of Grand Rapids has 11,000+ residents who rely on the WHPA to provide them with a safe public water source to supply our public water system. Our community brand is: Grand Rapids, It’s in Minnesota’s Nature. We pride ourselves on the precious resource that is our water. From 8.3.1 of the D-EIS, **Potential Impacts and Mitigation Measures: Long-Term Effects Could Be Significant and Would Require Site-Specific Mitigation Measures:**

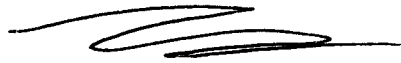
In sum, impacts on human and natural resources due to potential subsidence of the ground above the abandoned Line 3 are anticipated to be minimal in the near term but could be significant in the longer term, absent effective monitoring, adaptive management, and the timely introduction of mitigation measures. Because of the length of Line 3 and the variety of resources crossed, mitigation measures would be site specific and would need to be designed in collaboration with those agencies and authorities responsible for the resources in question. (8.4)

The resource in question for our community is our public water supply and we cannot support the abandonment of Line 3 knowing that the impact “could be significant in the long-term.” According to the D-EIS, “The Longer the Pipe Is in the Ground, the More Likely It Is to Fail” (8-8). If Line 3 is not removed, and when it fails and/or buoyancy is lost; it is generally expected that Cities and its residents are responsible for the clean-up. Since Line 3 runs directly through our Well Head Protection Area (WHPA), which is the sole source of municipal water for two cities (Grand Rapids and LaPrairie), the City is requesting that you require the total removal of Line 3 within the WHPA. In addition, the City requests that any contaminated soils within the WHPA be removed. Lastly, we request that Line 3 be removed in any urban developed areas. Please find attached the Line 3 replacement project detailed map set (23A and 23B), aerial and topographic.

Sincerely,



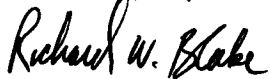
Dale Adams, Mayor



Tasha Connelly, Council Member



Dale Christy, Council Member



Rick Blake, Council Member



Bill Zeige, Council Member

CC: Tom Pagel, City Administrator, Denny Doyle, Grand Rapids Public Utilities

