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**From:** Janet Hill [mailto:janet.hill@rocketmail.com]  
**Sent:** Wednesday, March 12, 2014 1:27 PM  
**To:** Hartman, Larry (COMM)  
**Subject:** Public Comment for PPL-13-474 (Sandpiper Pipeline Route), Alternative Routes

To the Minnesota Public Utilities Commission:

The Big Sandy Lake Association submits the following comment in response to the request for alternative routes for the Sandpiper project.

**Who we are.** The Big Sandy Lake Association (BSLA) is a strong, not-for-profit lake association in Aitkin County with 540 members. The BSLA has been in existence since the 1950s. Part of our mission is to promote good lake management for Big Sandy Lake, serve as the voice for our membership in matters under consideration by federal, state, and local government bodies and agencies, and promote the welfare of the lake, its watershed, and surrounding area.

**About our area:** Big Sandy Lake is located in the Big Sandy Lake Watershed, the largest acreage of which is in Aitkin County, and which includes parts of Carlton and St. Louis counties. The map below shows the watershed and the proposed pipeline route passing through it.

Big Sandy Lake is at the receiving end of water flow from this watershed; our lake is the last stop before the water heads into the Mississippi River via a short stretch of the Sandy River. As such, Big Sandy Lake receives all runoff -- natural and man-made -- that finds its way into our watershed.

Big Sandy Lake is one of Minnesota's premier recreational lakes. At 6,526 acres, it is among the largest lakes in Minnesota, and is a popular fishing lake. It has between 950 and 1,000 lake homes, of which about half are homesteaded. Its islands and peninsulas enhance its beauty, and its proximity to the Twin Cities make it a popular destination for cabins and camps. Many residents have property on the lake that has been in the family for generations.

Our lake has rich historical significance, in that Big Sandy Lake (formerly called Sandy Lake) was part of what was once the main trade route between the eastern and western United States. Many generations of native Americans, and later, fur-trading voyageurs, used this route as their main "highway." Their trail -- the Savannah Portage -- includes a six-mile portage between the West and East Savanna rivers (now within Savanna State Park, which is also within the Big Sandy Lake watershed). Beginning around 1755, this trail was used for more than a century as the main route between east and west by fur traders, explorers, and missionaries. It hosted explorers such as Zebulon Pike, Lewis Cass, and Henry Rowe Schoolcraft, who all wrote about Sandy Lake in their journals. During the fur-trade era in the early 19th century, two fur trading posts were located on Big Sandy Lake, and artifacts from these posts are still being found by local residents.

**Our concerns:** The BSLA has two main concerns with the proposed Sandpiper Project:

- Our first concern is with the very real possibility of oil spills and leaks within the Big Sandy Watershed if the Sandpiper corridor is built. Despite claims by Enbridge, pipeline spills and leaks *do* happen, and they have caused well-documented and widespread damage to regions through which Enbridge has installed pipelines. Our mission -- as an organization established to protect our waters -- makes it impossible for us to approve of a pipeline and its accompanying risk of spills and leaks to be constructed through the watershed that feeds our lake.
- We also are concerned with the number of pipelines that will eventually be installed in the Sandpiper corridor. Despite claims by Enbridge that this corridor is for one pipeline only, if the Sandpiper Project is completed, Enbridge will have in place the established infrastructure, the environmental protocol, and the market connections it needs to reduce its cost of installing more pipelines in this corridor in the future. It would be a stretch to assume that Enbridge, with its

apparent “need” for more pipelines, would not add pipelines to the Sandpiper corridor in the future. Each new pipeline increases the risk of spills and leaks. We also know that tar sands are among the materials being transported by Enbridge, and that there is a possibility that future pipelines could carry tar sands.

**Enbridge claims that we take issue with:** In the *North Dakota Pipeline Company LLC Minnesota Environmental Information Report*, Section 9.1 Major Basins and Watersheds, Enbridge writes, “The [Sandpiper] project also crosses the Big Sandy Lake Watershed Management Project between MPs 540.5 and 562.4 in Aitkin and Carlton counties, which includes Big Sandy Lake and Lake Minnewawa. Both lakes are currently listed as 303(d) impaired Waters List due to excessive nutrients, specifically phosphorous loading. Neither lake is crossed by the Project.”

In this statement, Enbridge appears to be saying that because Big Sandy Lake would not be crossed by the Sandpiper pipeline, and because it is on the impaired waters list, that it can be dismissed from consideration for protection. We have a few comments to make on this:

- The impaired waters status of Big Sandy Lake is due in part to phosphorus levels. These phosphorus levels are, in turn, partly due to organic phosphorus being washed down from the many wetlands in our watershed. In other words, part of our higher-than-acceptable phosphorus numbers occur *naturally*.
- The impaired waters list was not designed by the state of Minnesota to condemn lakes that need no protection. Quite the opposite: listing lakes and rivers on the impaired waters list is the first step in attempts to repair them. Once they're on the list, the state works with local governments and citizen groups to design clean-up plans, and state funds are budgeted for this purpose. Forty percent of Minnesota's waters are on the impaired waters list and are receiving state funds.
- Over the past years, Big Sandy Lake and watershed has been the recipient of grants to study and help clean up our watershed from phosphorus. We received a grant for about \$250,000 and have completed a TMDL study, and are working on projects that monitor phosphorus reductions of the watershed so it can meet Minnesota's water quality standards. Thousands of hours have been spent on protecting Big Sandy Lake over the decades, by Minnesota Pollution Control staff, DNR staff, Big Sandy Area Lakes Water Management Plan (BSALWMP), Big Sandy Lake Association, and other volunteers, all working to protect our water.
- The Big Sandy Lake was awarded Star Lake status in 2010. This award is given to lake and river associations who meet eligibility requirements: the development of a lake management plan, a membership of at least 50% of private shoreland owners, and participation in a water quality monitoring program meeting Minnesota Pollution Control Agency standards. In other words, residents on Big Sandy Lake are committed to our lake and we work hard to protect it. We reject the notion that its status as an impaired waters lake makes it unworthy of protection from an oil spill.

**Because of the reasons stated above, the BSLA urges that the Minnesota Public Utilities Commission consider the Northern Route Alternative**, as described in the Minnesota Environmental Information Report, as the route for the Sandpiper pipeline because:

- it meets Enbridge's own stated requirements.
- it is already established.
- it will impact far fewer Minnesota residents, lands, and waters than the added Sandpiper route.
- it limits future spills and leaks to just one pipeline corridor instead of spreading the potential of spills to additional Minnesota counties.
- we feel that Enbridge is merely looking for the most convenient and cheapest way to expand their pipeline corridors, and we don't feel that Minnesotans, now and in the future, should

have to pay such a huge price for the convenience of a corporation.

- the great risk to all of the water and lands that oil pipeline corridors cross prompts us to urge that the MNPUC work on behalf of current and future Minnesotans to keep new oil and tar sands pipeline corridors to a minimum, or reject them outright, for the future health of our state. Our state's waters and lands are much more important than moving oil and tar sands from one place to another.

The Big Sandy Lake Association takes this position not to protest Enbridge, but to protect the Big Sandy Watershed, Big Sandy Lake, and our county from harm. Our legacy to future generations of Minnesotans cannot take into consideration the desires of a company who puts its own profits ahead of our land and water. When the North Dakota Pipeline Company presented its "Certificate of Need," to the MNPUC, it sounded to us more like a "Certificate of Want." We all need to look ahead not just twenty years, but fifty years or two hundred years, and think hard about what we'll leave behind if we allow these pipeline corridors to proliferate, to benefit a handful of company executives.

Bruce Johnson

on behalf of the Big Sandy Lake Association Board of Directors

-----Original Message-----

From: Janet Hill [<mailto:janet.hill@rocketmail.com>]

Sent: Monday, March 24, 2014 11:50 AM

To: Hartman, Larry (COMM)

Subject: PUC Docket 13-474: Sandpiper

Dear MN PUC Commissioners,

The Big Sandy Lake Association submits the following comment in response to the request for alternative routes for the Sandpiper project, docket 13-474.

Who we are: The Big Sandy Lake Association (BSLA) is a strong, not-for-profit lake association with 540 members. The BSLA has been in existence since the 1950s. Part of our mission is to promote good lake management, serve as the voice for the membership in matters under consideration by federal, state, and local government bodies and agencies, and promote the welfare of the lake, its watershed, and surrounding area.

About our area: Big Sandy Lake is located in the Big Sandy Lake Watershed, the largest acreage of which is in Aitkin County, and which includes parts of Carlton and St. Louis counties. The attached map shows the watershed and the proposed pipeline route passing through it.

Big Sandy Lake is at the receiving end of water flow from this watershed; our lake is the last stop before the water heads into the Mississippi River via a short stretch of the Sandy River. As such, Big Sandy Lake receives all runoff -- natural and man-made -- that finds its way into our watershed.

Big Sandy Lake is one of Minnesota's premier recreational lakes. At 6,526 acres, it is among the largest lakes in Minnesota, and is a popular fishing lake. It has between 950 and 1,000 lake homes, of which about half are homesteaded. Its islands and peninsulas enhance its beauty, and its proximity to the Twin Cities make it a popular destination for cabins and camps. Many residents have property on the lake that has been in the family for generations. Our lake has rich historical significance, in that Big Sandy Lake (formerly called Sandy Lake) was part of what was once the main trade route between the eastern and western United States. Many generations of native Americans, and later, fur-trading voyageurs, used this route as their main "highway." Their trail -- the Savannah Portage -- includes a six-mile portage between the West and East Savannah rivers (now within Savannah State Park, which is also within the Big Sandy Lake watershed). Beginning around 1755, this trail was used for more than a century as the main route between east and west by fur traders, explorers, and missionaries. It hosted explorers such as Zebulon Pike, Lewis Cass, and Henry Rowe Schoolcraft, who all wrote about Sandy Lake in their journals. During the fur-trade era in the early 19th century, two fur trading posts were located on Big Sandy Lake, and artifacts from these posts are still being found by local residents.

Our concerns: The BSLA has two main concerns with the proposed Sandpiper Project:

\* Our first concern is with the very real possibility of oil spills and leaks within the Big Sandy Watershed if the Sandpiper corridor is built. Despite claims by Enbridge, pipeline spills and leaks do happen, and they have caused well-documented and widespread damage to regions through which Enbridge has installed pipelines. Our mission -- as an organization established to protect our waters -- makes it impossible for us to approve of a pipeline and its accompanying risk of spills and leaks to be constructed through the watershed that feeds our lake.

\* We also are concerned with the number of pipelines that will eventually be installed in the Sandpiper corridor. Despite claims by Enbridge that this corridor is for one pipeline only, if the Sandpiper Project is completed, Enbridge will have in place the established infrastructure, the environmental protocol, and the market connections it needs to reduce its cost of installing more pipelines in this corridor in the future. It would be a stretch to assume that Enbridge, with its apparent "need" for more pipelines, would not add pipelines to the Sandpiper corridor in the future. Each new pipeline increases the risk of spills and leaks. We also know that tar sands are among the materials being transported by Enbridge, and that there is a possibility that future pipelines could carry tar sands.

Enbridge claims that we take issue with: In the North Dakota Pipeline Company LLC Minnesota Environmental Information Report, Section 9.1 Major Basins and Watersheds, Enbridge writes, "The [Sandpiper] project also crosses the Big Sandy Lake Watershed Management Project between MPs 540.5 and 562.4 in Aitkin and Carlton

counties, which includes Big Sandy Lake and Lake Minnewawa. Both lakes are currently listed as 303(d) impaired Waters List due to excessive nutrients, specifically phosphorous loading. Neither lake is crossed by the Project.”

In this statement, Enbridge appears to be saying that because Big Sandy Lake and Lake Minnewawa are not being crossed by the Sandpiper pipeline, and because they are on the impaired waters list, that they can be dismissed from consideration for protection. We have a few comments to make on this:

\* The impaired waters status of Big Sandy Lake is due in part to phosphorus levels. These phosphorus levels are, in turn, partly due to organic phosphorus being washed down from the many wetlands in our watershed. In other words, part of our higher-than-acceptable phosphorus numbers occur naturally.

\* The impaired waters list was not designed by the state of Minnesota to condemn lakes that need no protection. Quite the opposite: listing lakes and rivers on the impaired waters list is the first step in attempts to repair them. Once they're on the list, the state works with local governments and citizen groups to design clean-up plans, and state funds are budgeted for this purpose. Forty percent of Minnesota's waters are on the impaired waters list and are receiving state funds.

\* Over the past years, Big Sandy Lake and watershed has been the recipient of grants to study and help clean up our watershed from phosphorus. We received a grant for about \$250,000 and have completed a TMDL study, and are working on projects that monitor phosphorus reductions of the watershed so it can meet Minnesota's water quality standards. Thousands of hours have been spent on protecting Big Sandy Lake over the decades, by Minnesota Pollution Control staff, DNR staff, Big Sandy Area Lakes Water Management Plan (BSALWMP), Big Sandy Lake Association, and other volunteers, all working to protect our water.

\* The Big Sandy Lake was awarded Star Lake status in 2010. This award is given to lake and river associations who meet eligibility requirements: the development of a lake management plan, a membership of at least 50% of private shoreland owners, and participation in a water quality monitoring program meeting Minnesota Pollution Control Agency standards. In other words, residents on Big Sandy Lake are committed to our lake and we work hard to protect it. We reject the notion that its status as an impaired waters lake makes it unworthy of protection from an oil spill.

Our proposed alternative route.

Because of the reasons stated above, the BSLA urges that the Minnesota Public Utilities Commission consider the Northern Route Alternative, as described in the Minnesota Environmental Information Report, as the route for the Sandpiper pipeline because:

- \* it meets Enbridge requirements.
- \* it is already established.
- \* it will impact fewer Minnesota residents, lands, waters, and counties than the additional “preferred” route.
- \* it limits future spills and leaks to just one pipeline corridor instead of spreading the potential of spills to additional Minnesota counties.
- \* we feel that Enbridge is merely looking for the most convenient and cheapest way to expand their pipeline corridors, and we don't feel that Minnesotans, now and in the future, should have to pay such a huge price for the convenience of a corporation.
- \* Enbridge has an available pipeline in the northern corridor -- the Alberta Clipper pipeline -- that it can use for transporting Bakken crude instead of tar sands.

The great risk to all of the water and lands that oil pipeline corridors cross prompts us to urge that the MNPUC work for current and future Minnesotans to keep new oil and tar sands pipeline corridors to a minimum, or reject them outright. The Big Sandy Lake Association takes this position not to protest Enbridge, but to protect the Big Sandy Watershed, Big Sandy Lake, and our county from environmental and economic damage.

Our legacy to future generations of Minnesotans cannot continue to support a system that puts profits ahead of our

land and water. When the North Dakota Pipeline Company presented its “Certificate of Need,” to the MNPUC, it sounded to us more like a “Certificate of Want” for all parties involved in making money off this pipeline. We all need to look ahead not just twenty years, but fifty years or two hundred years, and think hard about what we’ll leave behind if we allow these pipeline corridors to proliferate, to benefit a handful of company executives.

Bruce Johnson

on behalf of the Big Sandy Lake Association Board of Directors

