

April 4, 2014

Dr. Burl Haar, Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101-2147

Re: In the Matter of North Dakota Pipeline Company LLC,
MPUC Docket #13-474 and #13-473

Dear Dr. Haar:

I am opposed to the Carlton County Route Alternative for the hazardous liquids Sandpiper Pipeline Project proposed by North Dakota Pipeline Company (NDPC). My husband and I own property and a home located on the Carlton County Route Alternative and would be negatively affected. I utilize my 25 years of professional experience working as a forestry technician, hydrology technician, geological engineer, and mineral management specialist, to present the following discussion.

The PUC should dismiss and reject the Carlton County Route Alternative for the following reasons:

- PUC should honor the agreement between NDPC and the Carlton County Commissioners that revised the Preferred Route to more closely follow existing utility corridor right-of-ways (ROWs) near Interstate 35 and reduce socio-economic and environmental impacts to eastern Carlton County. They both recognized the significant impacts to the organic farmers and other landowners along the original route, sensitive soils and watersheds. I commend the Carlton County Commissioners for their forward vision and NDPC for their willingness to propose a more environmentally and socio-economically sound Preferred Route through eastern Carlton County. The revised Preferred Route submitted in January 2014 is a significant improvement over the Carlton County Route Alternative.
- The majority of the revised Preferred Route in eastern Carlton County is now proposed to follow existing ROWs in accordance with the State's non-proliferation policy and statute on route selection criteria. Eastern Carlton County has numerous existing ROWs crossing the area (see exhibit 1). There is no justifiable reason why a pipeline would need to be routed through 14.7 miles of greenfield as proposed in the Carlton County Route Alternative.

- The Carlton County Route Alternative cuts across two corners of our property and, in effect, wraps 180 degrees around our house. The route would permanently remove 15% of our land from any future use by us. It would destroy the most productive parts of our property on higher ground where the best soils and vegetation are located. It would remove a 120 foot wide strip of timber from the back of our property. It is proposed to be located 200 ft from our home, 110 ft from our organic garden, and 250 ft from our drinking water well. As future pipelines are added to this new corridor, they would get even closer to our home and water well and destroy our garden, lawn and landscaping for the temporary construction work space.

Our organic garden provides a significant portion of our food needs. Without this garden we would be harmed not only monetarily but deprived of a very important aspect of our lives. Our property has limited topsoil and level ground conducive to establishing a new garden.

- We choose to live here for it's proximity to the organic sustainable farms in our immediate area and the lack of utility corridors. I believe living so close to a highly explosive, high pressure, hazardous liquids pipeline would put our safety at risk and negatively impact me and my family's health including mental and physical anguish and fatigue. Our house and well are directly downhill and down gradient from the Carlton County Route Alternative proposed pipeline and any future spills would flow into our house and yard. In addition, the numerous carcinogenic and other dangerous chemicals contained in the pipeline could contaminate our drinking water well if there was a leak. Our well is in the route survey corridor of the pipeline. We would be burdened by having to monitor our water well for contamination which would be very costly without just compensation. Without monitoring, we risk drinking dangerous, potentially life threatening contaminated water without being aware of this hazard. In the application, NDPC does not propose to monitor any landowner's drinking water wells. It is not appropriate to locate a hazardous liquids pipeline corridor that close to our home or any other homes. For any route chosen for this project, NDPC should be required to annually monitor groundwater wells located within the route survey corridor.

- We manage our property organically and any chemical application along the pipeline ROW during maintenance would negatively impact our property, garden and our health. The use of chemicals would impact a larger area than just along the ROW due to aerial drift and would contaminate a large area around our home and community. The chemicals would harm the native vegetation in the area and the vegetation on our property.

- We would personally be subject to a negative economic impact caused by this pipeline. Our property values would be permanently devalued due to the presence of a hazardous liquids pipeline in very close proximity to our house. In addition, it

removes 15% of the property from any future use by us. I have investigated numerous studies and based on the results, I expect our property to lose 10-30% in value and take much longer to sell. I have been told that a local real estate agent said that it is difficult to sell homes in the Duluth area that are located near utility ROWs. Negative public perceptions of utility corridors and living near hazardous liquids pipelines are driving forces in how much a home can sell for. There would be no reduction in our property tax, so in essence, we would be paying more taxes for land that is not truly ours. Eminent domain proceedings would not adequately compensate us for our true losses. We have made our retirement decisions based on critical economic considerations such as the value of our home and property and how this will support us as we downsize in our retirement. The significant reduction in our home's value would negatively affect our economic stability during retirement; a vulnerable time in our lives.

- The Carlton County Route Alternative would place a new hazardous liquids pipeline corridor through 14.7 miles of “greenfield”. The revised Preferred Route in eastern Carlton County would eliminate 10.5 miles of undisturbed “greenfield” and follow existing ROWs. The Preferred Route has fewer stream crossings and trout streams impacted compared to the Carlton County Route Alternative. It also avoids the MN protected Clear Creek and Deer Creek watersheds and has a reduced impact to the MN protected Blackhoof River watershed. The Nemadji River and Deer Creek are on the impaired waters list for turbidity concerns under section 303(d) of the Clean Water Act. Eliminating the Carlton County Route would mitigate impacts to these impaired watersheds.
- The Carlton County Route Alternative would invade our community and potentially destroy the delicate balance of the surrounding ecosystem and negatively affect the socio-economics of the area; in particular the vibrant organic sustainable farming businesses in eastern Carlton County. It risks future economic growth of sustainable organic farming in our area. The prime farmland in our area has some of the best soils for growing food in the region. The disruption of these soils by constructing a pipeline ROW, continuous maintenance, and future expansion will make these soils unsuitable for growing food. If a pipeline corridor is constructed along the Carlton County Route, the thin 0-6 inch thick Prime Farmland soils in eastern Carlton County would not retain their viability for growing crops and farmers would lose the ability to organically farm or expand their current operations. In addition, use of herbicides to control noxious and undesirable plants that frequent pipeline corridors is not compatible with the area organic farming businesses.
- Saying the Carlton County Route was developed “to minimize impacts by taking the most direct route possible” is misleading. The Preferred Route is only 1.4 miles

longer than the Carlton County Route Alternative. Using differences in distance when comparing this alternative to the Preferred Route is meaningless considering the Preferred Route is 43.3 miles longer than the Northern Route Alternative. The 1.4 miles out of 612 total route miles is only 0.2% of the entire route. The main difference is that the Carlton County Route is in “greenfield” and the Preferred Route follows existing pipeline and transmission line ROWs. Clearly the Preferred Route is superior to the Carlton County Route.

- Directly east of our property is a large tract (approximately 1.4 square miles) of undeveloped forest. This tract has multiple tributaries of Clear Creek flowing through it. Clear Creek is a tributary to the Nemadji River, a protected watercourse in Minnesota. This forest is ecologically diverse. It functions as a wildlife corridor between Jay Cooke State Park, Blackhoof State Forest, and the Nemadji State Forest. We have witnessed wolves and otters traveling through from north to south in the winter. The Carlton County Route Alternative would cut through this forest and upset the balance of this important natural resource. The route would fragment this large tract of forest. Forest fragmentation is a statewide issue that the Minnesota Dept. of Natural Resources is addressing. Additional unnecessary fragmentation caused by this project should be avoided.
- We are owners of a rural property in a nearby state that currently has two hazardous liquids pipelines passing through it. For years, we made attempts to eradicate both spotted knapweed and trefoil, noxious and invasive weed species, from the pipeline ROWs. These weeds are now starting to invade the road to our house, our hay fields, and our yard. In time, we expect them to spread down roads and into farmers fields and beyond. The trefoil was introduced by Enbridge as part of the “reclamation” seed mix. The weeds are continually dispersed by illegal snowmobile and ATV use on the ROWs to the point that we cannot control their spread anymore. We have given up trying to stop the spread of these weeds due to the intense labor and high cost for us. Based on this experience, noxious and invasive weeds are a real problem with pipeline ROWs and impacts need to be fully studied and effective mitigation required.

I am a member of the Carlton County Land Stewards and participated in the writing of their Route Permit Application comments dated and submitted to the PUC April 3, 2014. Instead of copying all that information into my letter, I will incorporate them by reference and ask that they be considered part of this comment submittal.

My overall impression of NDPC's project Environmental Information Report (EIR) is that it lacks detail and is not clear as to what impacts may occur. There is little raw data to substantiate most of the claims made by NDPC. It appears to be an office generated computer exercise and now it needs to be expanded to better represent site specific resources. Project impact mitigation measures are limited and need to be further

developed to address additional impacts not examined or disclosed. I am attaching the U.S. Department of State, June 5, 2009, Final Environmental Impact Statement (FEIS), Chapter 4 – Environmental Analysis, for the Presidential Permit application for Line 67 (Alberta Clipper) (see exhibit 2) to be incorporated by reference into my comments. I request that this document be used as an example of the type of details that should be included in the Sandpiper project environmental analysis. Many issues and environmental impacts and effects are applicable, and much of the same mitigation would apply and should be included in the project permit. **The FEIS document should be used for the project analysis and also to address the Northern Route Alternative since it is co-located in the existing Enbridge Mainline ROW pipeline corridor where the Alberta Clipper was constructed.**

The NDPC Environmental Impact Report is limited in scope and does not adequately disclose the resources along the routes. It is impossible to understand what impacts can be expected. Without that detail, it is very difficult to develop alternatives to submit during this public comment period for the route application. **Due to high controversy, complexity, and potential significant impacts expected (construction, maintenance, direct and indirect impacts, reasonably foreseeable and connected actions), a complete Minnesota Environmental Impact Statement under the Minnesota Environmental Policy Act must be completed.** It should include site specific details about the Preferred Route and all the Alternatives and offered back to the public for their comments and alternatives. Only then can meaningful alternatives be compared, impacts fully disclosed to the public, and well reasoned decisions made.

In summary, the Carlton County Route Alternative should be rejected as a viable route for this project, the route must follow existing ROWs, and a detailed site-specific Minnesota Environmental Impact Statement should be completed. Thank you for this opportunity to voice my comments and concerns relating to the project.

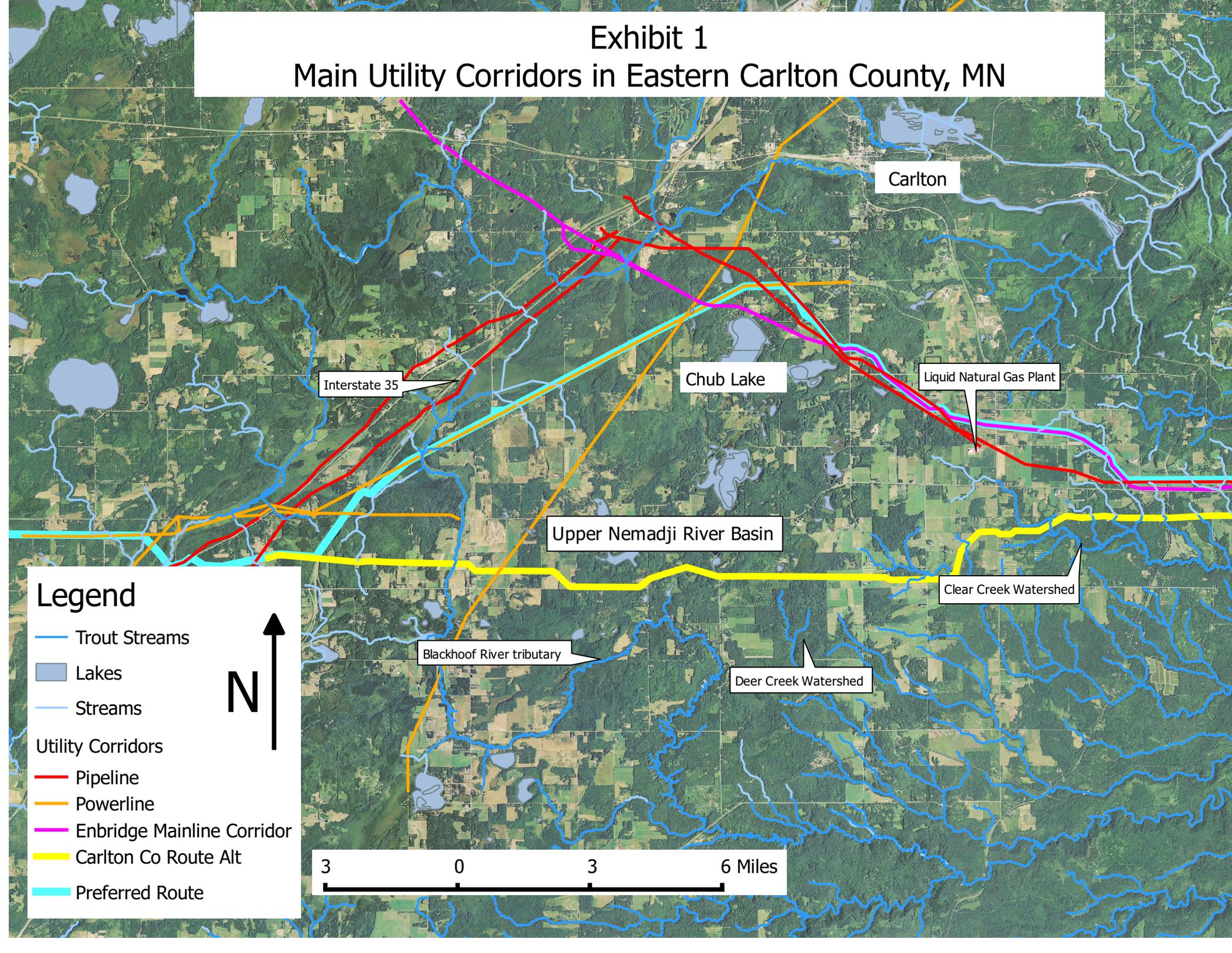
Sincerely,

s/s Loretta Cartner

Loretta Cartner
2560 County Road 1
Wrenshall, MN 5579

Exhibit 1

Main Utility Corridors in Eastern Carlton County, MN



Legend

- Trout Streams
- Lakes
- Streams
- Utility Corridors
 - Pipeline
 - Powerline
 - Enbridge Mainline Corridor
 - Carlton Co Route Alt
 - Preferred Route

