

Appendix C

2015 Comment Summary Report and Alternatives Report

Line 3 Pipeline Replacement Project Comment Summary Report

In the Matter of the Application of Enbridge Energy, Limited Partnership for
a Pipeline Routing Permit for the Line 3 Replacement Project in Minnesota

Docket No. PL-9/PPL-15-137

November 24, 2015

Prepared by Minnesota Department of Commerce, Energy Environmental Review and
Analysis staff with assistance from Cardno, Inc.

1.0 Comments Received

Approximately 1077 comments from 225 unique commenters and organizations were received by the close of the comment period on September 30, 2015, for the Line 3 Replacement Project. Comments were received through various methods including public meeting oral comments, documents submitted to the court reporter and comments submitted by mail, email and fax.

Comments were received from numerous sources, including:

- Tribal: Mille Lacs Band of Ojibwe (Mille Lacs Band) and the White Earth Band of Ojibwe.
- State Agencies: Minnesota Department of Natural Resources; Minnesota Department of Transportation; and Minnesota Pollution Control Agency.
- Organizations and Businesses: Sierra Club; Friends of the Headwaters; United Association of Plumbers and Pipefitters; American Petroleum Institute; Carlton County Land Stewards; Belle Taine Lake Association; Leech Lake Area Watershed Foundation; Minnesota Coalition of Lake Associations; Long Lake Area Association (Hubbard County) Inc.; Hubbard County Coalition of Lake Associations; Innovative Foundation Supportworks; MN350, and Kennecott Exploration Company.
- Local Agency: Office of the Carlton County Auditor/Treasurer.
- Individuals: Numerous written comments were received from individuals and have been filed alphabetically by last name of the individual commenting.
- Enbridge.

Comments fell into the following alphabetized list of categories:

- **Climate Change/GHG:** Concern for climate change and greenhouse gas emissions associated with pipelines
- **Cumulative Impacts:** Request for a study of cumulative impacts from other pipeline proposals, request for lifecycle analyses
- **Delay Process Until Further Information Is Available:** Requested delay of evaluation or permitting process until new information could be obtained (e.g. new response methods).
- **Environmental Justice:** Concern for environmental justice in consideration of pipeline route alternatives
- **Evaluate Alternatives:** Request for evaluation of general alternatives to the preferred route
- **Fate of Existing Line 3:** comments on what will be done with the existing Line 3 pipeline area
- **Fisheries:** Concerns for fisheries and avoidance of impacts to fisheries
- **General Environmental Concerns:** General environmental concerns without a specific concern or location stated or a generalized list of environmental issues; comments on general land use; noise; seismic activity
- **General Opposition:** Opposition was explicitly expressed, whether solely or throughout their comment

- **General Support:** Support was explicitly expressed, whether solely or throughout their comment
- **Impacts to Water/Wetlands:** Preserving water quality and water resources including avoidance of lakes, rivers, streams, wetlands, wells and watersheds
- **Impacts to Wild Rice/Wild Rice Habitat:** Concerns for impacts to wild rice as a tribal/cultural resource and an agricultural commodity
- **Need of Project:** Questioned the need for the project
- **Opinion on an Alternative:** support or opposition to previously proposed route alternatives
- **Property Value and Landowner Rights:** Impact to the value of a home and/or property with the construction of the new pipeline and questions/concerns for the treatment of property owners and their rights
- **Proposed Alternative:** Commenter proposed an alternative to the Applicant's preferred route, such as a system alternative, new route alternative or retaining the Line 3 existing location,
- **Right-of-Way:** Concerns over impacts to right-of-way, or impacts caused by rights-of-way required for pipeline construction and/or operation
- **Socioeconomics and Tourism:** Impacts to tourism and the social economics of a community and/or region
- **Soils:** Soil concerns for the land use and concerns for soils that transport oil more quickly in the event of a leak
- **Spill Risk/Health & Safety:** Spill, contamination and safety concerns during construction and operation of the pipeline and comments stating general health concerns related to human life
- **State Lands/Forests:** State land preservation, proximity to it, and comments about routing through state lands/forests/parks; preserving or avoidance of trees and mitigation comments or concerns
- **Transportation:** Concerns for highway/rail transportation of oil, and avoidance of impacts to roads
- **Tribal and Cultural Resources:** Concerns related to a specific tribe, tribal activity or general cultural resources concerns
- **Vegetation:** Concerns for vegetation and avoidance of impacts to vegetation including comments with concerns for wild rice as an agricultural commodity
- **Want an EA/EIS:** Request for an EIS process was explicitly expressed by many commenters in reference to the fact that a CEA is planned to be conducted in lieu of an EIS
- **Wildlife:** Concerns for wildlife and avoidance of impacts to wildlife

More than half of all comments were submitted by individuals (Table 1). Three comment categories address alternatives. These categories are: Evaluate Alternatives, Opinion on an Alternative and Proposed Alternative. Proposed alternative comments are discussed in detail in the Line 3 Alternative Routes Report. Other than comments related to alternatives, the five comment categories with the most comments were: Want an EA/EIS, Spill Risk/Health and Safety, General Support, General Opposition, and Impacts to Water/Wetlands.

Comments in some instances identified specific places. The named places are summarized in Table 2, and include primarily water resource places, and also human settlement places.

Comment Category	Individuals	Local Agency	Organizations / Businesses	State Agencies	Tribal	Total
Climate Change/GHG	11		14	1		26
Cumulative Impacts	14		7	4	1	26
Delay Process Until Further Information Is Available	5		1			6
Environmental Justice	6		2	1	2	11
Evaluate alternatives	39		9	17	6	71
Fate of Existing Line 3	21		1			22
Fisheries	1		2	7		10
General Environmental Concerns	29		19	10	1	59
General Opposition	83		1			84
General Support	90	1	3			94
Impacts to Water/Wetlands	21		24	36	3	84
Impacts to Wildrice/Wildrice Habitat	24		3	1	1	29
Need of Project	21		6			27
Opinion on an Alternative	27		6			33
Property Value and Landowner Rights	8		3			11
Proposed Alternative	14		74	19		107
Right-of-Way	1		2	5		8
Socioeconomics and Tourism	18		6	2		26
Soils	3		9	5		17
Spill Risk/Health & Safety	66		29	15		110
State Lands/Forests			5	5		10
Transportation				6		6
Tribal and Cultural Resources	31		10		4	45
Vegetation	1		2	8		11
Want an EA/EIS	100		15	1	3	119
Wildlife	4		9	12		25
Grand Total	638	1	262	155	21	1077

TABLE 2					
Places Names Identified in Comments					
Water Resources					
Resource Name	County	Resource Name	County	Resource Name	County
Red Lake River	Red Lake County	Fishhook Chain of Lakes	Becker	St. Louis River	Carlton
Spring Brook/Spire Valley AMA / Scout Camp Pond + (fish hatchery)	Cass	Erie Lake	Becker	Blackhoof River, Mud Lake	Carlton
Headwater springs of Roosevelt Lake	Cass	Clearwater River	Clearwater	Tamarack area of Aitkin and Carlton county border +	Aitkin/Carlton
Pine River and watershed	Cass	Upper Rice Lake	Clearwater	Moose Horn River tributary to Hanging Horn Lake and Moosehead Lake	Carlton
LaSalle Creek, AMA, State Rec. Area +	Cass	Crow Wing River	Wadena	Salo Marsh/Sandy River/Sandy River Flowage/Big Sandy Lake system	Aitkin
South Fork	Cass	Shell River (Miss R tributary)	Wadena	Willow River, White Elk Creek, Flowage Lake	Aitkin
Cass Lake	Cass	Long Prairie River	Todd	Fifty Lakes	Crow Wing
Miss River headwaters +	Hubbard/ Cass	Moose River	Beltrami	Whitefish Lake watershed	Crow Wing
Straight River and watershed +	Becker/ Hubbard	Villard WMA	Pope		
Hay Creek	Hubbard	Duck Lake	Blue Earth County		
Deer winter cover complex in sections 31 and 32 of Badoura Township and section 36 of Crow Wing Lake Township	Hubbard	Hay Creek	Pine		

TABLE 2					
Places Names Identified in Comments					
Cultural and Human Settlement Resources					
Resource Name	County	Resource Name	County	Resource Name	County
Bakwa manoomin land area (wild rice)	multiple	North Country Trail (recreational)	multiple	Itasca State Park (recreational)	Hubbard
East Lake (community)	Aitkin	Rice Lake (community)	St. Louis	Camp Ripley	Morrison
Anishinaabe Akiing (cultural)	multiple				

+ Place identified in multiple comments



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1.0 Alternative Routes Overview

The existing Line 3 pipeline extends from Edmonton, Alberta, to Superior, Wisconsin, with terminals at Clearbrook, Minnesota, and Superior, Wisconsin. Enbridge (the Applicant) is requesting a route permit for approximately 337 miles of pipeline in Minnesota to replace the existing Line 3 pipeline. The North Dakota Pipeline Company is also requesting a route permit for their Sandpiper Pipeline Project (Docket PL-6668/PPL-13-474). Enbridge's Line 3 Replacement Project is proposed to co-locate with the Sandpiper Pipeline Project between Clearbrook, Minnesota and Superior, Wisconsin. Because these two route proposals would follow the same route from Clearbrook to Superior, many recommendations received during the Line 3 Replacement Project comment period are restatements of route and system alternatives previously submitted for the Sandpiper Pipeline Project.

This Line 3 Replacement Project Alternative Routes Report prepared by the Minnesota Department of Commerce Energy Environmental Review and Analysis (EERA) presents all alternative proposals submitted by commenters for the Minnesota portion of the Line 3 Replacement Project. The report provides recommendations on the route alternatives for evaluation pursuant to Minnesota Rule 7852.1400, Route Proposal Acceptance.

The comment period for identification of route alternatives for the Line 3 Replacement Project ended on September 30, 2015. There were approximately 225 submittals including those received by letter, email, and verbal communications that were recorded by a court reporter at 15 public meetings held in August 2015. The 225 submittals comprised 1,077 comments. All of these submittals and comments were screened to determine which included proposals for alternatives, yielding a total of 107 proposals. If necessary, commenters were contacted by EERA for further information or clarification of their proposals. The 107 proposals yielded 71 new alternatives that are included in this report. The remaining 36 were duplicative of alternatives already suggested, requests for route alternatives already accepted during the Sandpiper proceedings or requests for system alternatives already considered during the Sandpiper route proceedings¹.

Line 3 proposals received were divided into three categories: route alternatives, alignment modifications and system alternatives.

- **Route alternatives** are alternatives that deviate from the Applicant's preferred route to avoid environmental impacts or address landowner concerns (11 route alternatives identified).
- **Alignment modifications** are adjustments to the centerline within the Applicant's preferred route (57 centerline adjustments identified).
- **System alternatives** are alternatives that propose a different configuration of pipelines for moving oil than the Applicant's proposal. They are a wholly separate or independent alternative from the Applicant's proposed route and are, in essence, a

¹See DOC-EERA Comment and Recommendations on Alternatives for Sandpiper Pipeline 13-474, July 16, 2014, eDockets Number [20147-101573-01](#).

different project than the one proposed by the Applicant (three Line 3 system alternatives identified).

1.1 Route Alternatives

1.1.1 *Line 3 Route Alternatives*

There were 11 new route alternatives received during the comment period (Table 1). These route alternatives were suggested by Enbridge, the Minnesota Department of Natural Resources (DNR), and members of the public. Ten of these proposals are short alternatives to the Applicant's preferred route. One proposal is for replacement in the existing Line 3 location. The overview map showing the locations of Line 3 route alternatives, the Applicant's preferred route, and Sandpiper accepted route alternatives is presented in Figure 1. Detailed maps of the Line 3 route alternatives are presented in Figures 2 through 6.

1.1.2 *Sandpiper Accepted Route Alternatives*

During the comment period for the Line 3 Replacement Project, all Sandpiper route alternatives already accepted were requested for consideration. The Minnesota Public Utilities Commission (Commission) accepted 53 route alternatives during the Sandpiper Pipeline Project proceedings, and of these 53 route alternatives, 48 apply to the segment from Clearbrook to Superior, Wisconsin (Figure 1).

1.1.3 *Line 3 Recommended Route Alternatives*

All 11 route alternatives presented in Table 1 are recommended for further analysis. The 48 Sandpiper Pipeline Project route alternatives previously accepted by the Commission that also apply to the Line 3 Replacement Project are also recommended for further analysis.

TABLE 1					
Line 3 Route Alternatives					
Proposed Alternative ID	County	Alternative Description	Commenter's Reason for Alternative	Comment Source	Length (miles)
L3-RA-01	Kittson County	This alternative would modify the centerline and route of the Applicant's April 2015 preferred route where it crosses mostly agricultural land. This alternative deviates from the April 2015 Route at milepost (MP) 27.4-W in Kittson County, Minnesota, and rejoins the route at MP 27.9-W, in Marshall County, Minnesota.	Improves the constructability at Highway 75 by changing the crossing angle alignment at the highway. The new alignment crosses at a more perpendicular angle, which will minimize the length of the road bore needed for crossing under the highway.	Enbridge	0.55
L3-RA-02	Marshall County	This alternative would modify the centerline and route of the Applicant's April 2015 preferred route where it crosses mostly agricultural land.	To accommodate a landowner request.	Enbridge	2.04
L3-RA-03	Pennington County	This alternative would modify the centerline and route of the Applicant's April 2015 preferred route where it crosses mostly agricultural land.	To accommodate a landowner request.	Enbridge	7.31
L3-RA-04	Clearwater County	This alternative exits the Clearbrook Terminal on the north side of the facility. From that point, it turns west and then turns and runs south to rejoin the Applicant's preferred route south of the Terminal and Deep Lake.	This alternative would modify the centerline of the Applicant's preferred route where it crosses a mix of agricultural and forested land. Enbridge proposes this Route Alternative in direct response to comments received from landowners located on the existing Enbridge Mainline System right-of-way near Clearbrook, Minnesota.	Enbridge	2.52
L3-RA-05	Clearwater County	This alternative would modify the centerline of the Applicant's preferred	To avoid the Eastern Wild Rice Watershed and remove any hydrologic	Enbridge	13.01

TABLE 1					
Line 3 Route Alternatives					
Proposed Alternative ID	County	Alternative Description	Commenter's Reason for Alternative	Comment Source	Length (miles)
		route where it crosses mostly forested land with some agricultural land	connection to Lower Rice Lake.		
L3-RA-06	Aitkin County	This alternative would modify the centerline of the Applicant's preferred route where it crosses mostly agricultural land	To accommodate a landowner request to move a portion of the April 2015 Route crossing their property that may be mined in the future for gravel.	Enbridge	0.39
L3-RA-07	Aitkin County	This alternative would modify the centerline of the April 2015 Route where it crosses a mix of forested, open, and agricultural land.	Proposed as a result of communications with the landowner, Kennecott Exploration Company ("Kennecott"), in which the owner indicated opposition to the location of the April 2015 Route crossing its property and a preference that the route not cross its mineral leases.	Enbridge	1.45
L3-RA-08	Carlton County	This alternative would modify the centerline of the April 2015 Route where it crosses a mix of forested, open, and agricultural land.	Proposed to address concerns raised by the Minnesota Department of Natural Resources and Kennecott by avoiding crossings of the Kennecott mineral leases (KEX Areas of Interest), while ensuring that Enbridge's environmental and constructability concerns are met.	Enbridge	7.19
L3-RA-09	Carlton County	This alternative would modify the centerline of the April 2015 Route where it crosses mostly forested land.	Expand the route width in this area to accommodate the HDD crossing of I-35 in response to a landowner request to move a portion of the Sandpiper Route crossing their property.	Enbridge	0.60
L3-RA-10	Mille Lacs, Kanabec, Pine Counties	This alternative is a variation of Sandpiper SA-03 As Modified. The route would proceed from the west: southeast on SA-03 As Modified,	This alternative would reduce the number of public water crossings and avoid higher population areas.	DNR	42

TABLE 1					
Line 3 Route Alternatives					
Proposed Alternative ID	County	Alternative Description	Commenter's Reason for Alternative	Comment Source	Length (miles)
		northeast on US 169 to avoid Milaca, east on MN-23 to the intersection with MN-65, then cross country to CSAH 11 to avoid Mora, north on CSAH 11 to reconnect with MN-23, then east on MN-23 to connect with the SA-03 As Modified route.			
L3-RA-11	Clearwater, Beltrami, Hubbard, Cass, Aitkin, St. Louis, and Carlton Counties	This alternative would replace Line 3 in its current location.	Avoid concerns about decommissioning and in place abandonment of the current Line 3 pipeline.	DNR, Ann Truelson, Maurice Spangler, Sharon Natzel, Sierra Club, Thomas Fisch, Susan and Delano Erickson, and Roger Thein	350

1.2 Alignment Modifications

The Applicant proposed 57 alignment modifications of their preferred route for constructability reasons, to address landowner concerns and to avoid environmental resources (Table 2). All 57 alignment modifications are recommended to be incorporated into the Applicant's preferred route for analysis. Maps of these alignment modifications are provided in Appendix A.

Proposed Modification ID	County	Alignment Modification Description	Length (miles)
CA-01	Kittson County	Move cross-over location southeasterly to avoid construction conflict with east-west ditch.	0.07
CA-02	Kittson County	Smooth out turning angle; change to Field Induction Bend.	0.04
CA-03	Kittson County	Smooth out turning angle; change to Field Induction Bend.	0.18
CA-04	Kittson County	Smooth out turning angle; change to Field Induction Bend.	0.35
CA-05	Marshall County	Re-alignment to match HDD crossing plan.	0.04
CA-06	Marshall County	Re-alignment to match HDD crossing plan.	0.04
CA-07	Pennington County	Re-alignment for pipeline cross-over.	0.15
CA-08	Red Lake County	Re-alignment to match station piping at Plummer Station.	0.39
CA-09	Clearwater County	Re-alignment to match station piping at Clearbrook Station.	0.01
CA-10	Clearwater County	Re-alignment at wetland crossing to increase offset with the Sandpiper Pipeline Project to 40 feet.	0.18
CA-11	Clearwater County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.55
CA-12	Marshall County	Eliminate cross-over of Enbridge Mainline System.	0.48
CA-13	Clearwater County	Re-alignment to improve angle of road crossing.	0.44
CA-14	Clearwater County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.57
CA-15	Clearwater County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.74

TABLE 2			
Alignment Modifications			
Proposed Modification ID	County	Alignment Modification Description	Length (miles)
CA-16	Clearwater County	Re-alignment to improve angle of road crossing.	0.09
CA-17	Clearwater County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.27
CA-18	Clearwater County	Re-alignment for powerline cross-over.	0.08
CA-19	Clearwater County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.12
CA-20	Clearwater County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	1.04
CA-21	Hubbard County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.12
CA-22	Hubbard County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.30
CA-23	Hubbard County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.57
CA-24	Hubbard County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.17
CA-25	Hubbard County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.10
CA-26	Hubbard County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.25
CA-27	Hubbard County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.14
CA-28	Hubbard County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.19
CA-29	Hubbard County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.14
CA-30	Hubbard County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.37
CA-31	Cass County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.70
CA-32	Cass County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.73
CA-33	Cass County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.23
CA-34	Cass County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.29

TABLE 2			
Alignment Modifications			
Proposed Modification ID	County	Alignment Modification Description	Length (miles)
CA-35	Cass County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.31
CA-36	Cass County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.31
CA-37	Cass County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.18
CA-38	Cass County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.03
CA-39	Cass County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.15
CA-40	Cass County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.14
CA-41	Cass County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.21
CA-42	Aitkin County	Re-alignment to improve angle of road crossing.	0.25
CA-43	Aitkin County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.93
CA-44	Aitkin County	Re-alignment to avoid downward slope to waterbody.	0.47
CA-45	Aitkin County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.49
CA-46	Aitkin County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	1.27
CA-47	Aitkin County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	2.65
CA-48	Carlton County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.21
CA-49	Carlton County	Re-alignment to avoid powerline easement.	0.04
CA-50	Carlton County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.34
CA-51	Carlton County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.17
CA-52	Carlton County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.37
CA-53	Carlton County	Re-alignment at wetland crossing to increase offset with Sandpiper Pipeline Project to 40 feet.	0.19
CA-54	Carlton County	Re-alignment to adjust for Sandpiper Pipeline Project valve spacing.	0.18

TABLE 2			
Alignment Modifications			
Proposed Modification ID	County	Alignment Modification Description	Length (miles)
CA-55	Carlton County	Re-alignment to increase offset from Sandpiper Pipeline Project in area of steep slopes.	0.43
CA-56	Carlton County	Re-alignment at road crossing to avoid crossing existing pipeline.	0.07
CA-57	Carlton County	Eliminate cross-over of Enbridge Mainline System.	0.28

Note: CA = centerline adjustment

1.3 System Alternatives

Enbridge Energy proposes to replace its existing Line 3 pipeline and associated facilities between the North Dakota/Minnesota border and the Minnesota/Wisconsin border. A system alternative proposes a different configuration of pipelines for moving oil than the Applicant’s proposal. It is a wholly separate or independent route from the Applicant’s proposed route and is, in essence, a different project than the one proposed by the Applicant.

Minnesota Rule 7852.0100, subpart 31, defines a route as “the proposed location of a pipeline between two endpoints.” Enbridge has requested that the replacement pipeline serve the same purpose and need as the existing Line 3, which is the transportation of crude oil from (1) Canada to (2) Enbridge’s Clearbrook Terminal near Clearbrook, Minnesota, and to (3) the Superior Terminal near Superior, Wisconsin. Thus, the Project, for route permit application purposes, is defined by these three points. Commenters proposed three new system alternatives. The three system alternative proposals do not connect with one or more of these points (Figure 6). Because the three proposed system alternatives are not alternative routes that meet the purpose of the Project as identified in the permit application, EERA does not believe these system alternatives are appropriate for further consideration in the route permitting proceeding.

Table 3 summarizes all new system alternatives identified during the comment period for the Line 3 Replacement Project. Locations of these system alternatives are provided in Figure 7. In addition, several commenters proposed system alternatives that were the same or similar to previously proposed Sandpiper pipeline system alternatives. Requests for consideration of system alternatives already submitted for the Sandpiper Pipeline Project (SA-03 through SA-08) are presented in Figure 8.

TABLE 3**Line 3 System Alternatives**

Proposed Alternative ID	Commenter	Alternative Description	Commenter's Reason for Alternative
L3SA-01	Sierra Club	The Sierra Club proposes an alternative that would follow the existing Line 3 route from the North Dakota border to Clearbrook, and from there utilize the Minnesota Pipeline to its closest point of contact with the Wood River Pipeline, at which point connecting infrastructure would be built to the Wood River Pipeline, and then through the Wood River Pipeline to its terminus in Illinois, from where a connector would be built to the nearest Enbridge pipeline terminal.	The Sierra Club proposes that the capacity of the Wood River Pipeline in combination with the existing Line 3 pipeline's capacity could approximate the capacity required in Enbridge's proposed replacement project and reduce impacts.
L3SA-02	Friends of the Headwaters (FOH)	This proposed alternative is termed Alternate Route A in the FOH comment letter. This is designated as SA-04 in the Sandpiper Alternative Routes Summary Report (EERA 2014). It would use an existing energy route (of which Enbridge is a 50% shareholder with Alliance Company of Canada) that shares a U.S. border crossing with Enbridge's Line 3 route in Alberta, Canada, and links to the Enbridge system near Flanagan, Illinois, where it connects to the remainder of Enbridge's pipeline system. This proposed alternative also includes Alternate Route B in the FOH comment letter. This route would follow the Viking pipeline route to its southern point, and continue south to meet and then follow the Alliance pipeline route to Enbridge facilities in Flanagan, Illinois.	The alternative route reflects FOH's position that no new pipelines should be constructed through Minnesota's northern water landscape. Rather, this new energy route should be placed in a location that FOH considers to have a lower risk to State waters and also considers to be the easiest area to mitigate should a spill occur.

TABLE 3**Line 3 System Alternatives**

Proposed Alternative ID	Commenter	Alternative Description	Commenter's Reason for Alternative
L3SA-03	Minnesota Department of Natural Resources (DNR) and Minnesota Pollution Control Agency (MPCA)	<p>This proposed major alternative is identical to system alternative SA-03 proposed for the Sandpiper pipeline. L3-01 also includes the SA-03 Northern Extension Alternative provided in the DNR comment letter to connect SA-03 to the existing Line 3 in Polk and Marshall Counties.</p> <p>This proposed alternative also includes modifications to system alternative SA-03 proposed for the Sandpiper pipeline, termed the SA-03 Prairie Fen Avoidance Alternative in the DNR comment letter. Routing would proceed south along SA-03, then east along County State Aid Highway (CSAH) 40, thence to Clay County T-367, south along the Minnkota Power Cooperative Transmission Line, and thence south on CSAH 7 to meet up with the SA-03 route.</p>	<p>The DNR's review during the Sandpiper Certificate of Need proceeding found that the SA-03 route provides an opportunity to avoid a region of the state with a higher concentration and quality of natural resources, and could reduce impacts to fens, Minnesota County Biological Survey Sites of Biodiversity Significance and portions of the Minnesota Prairie Conservation Plan core area.</p>

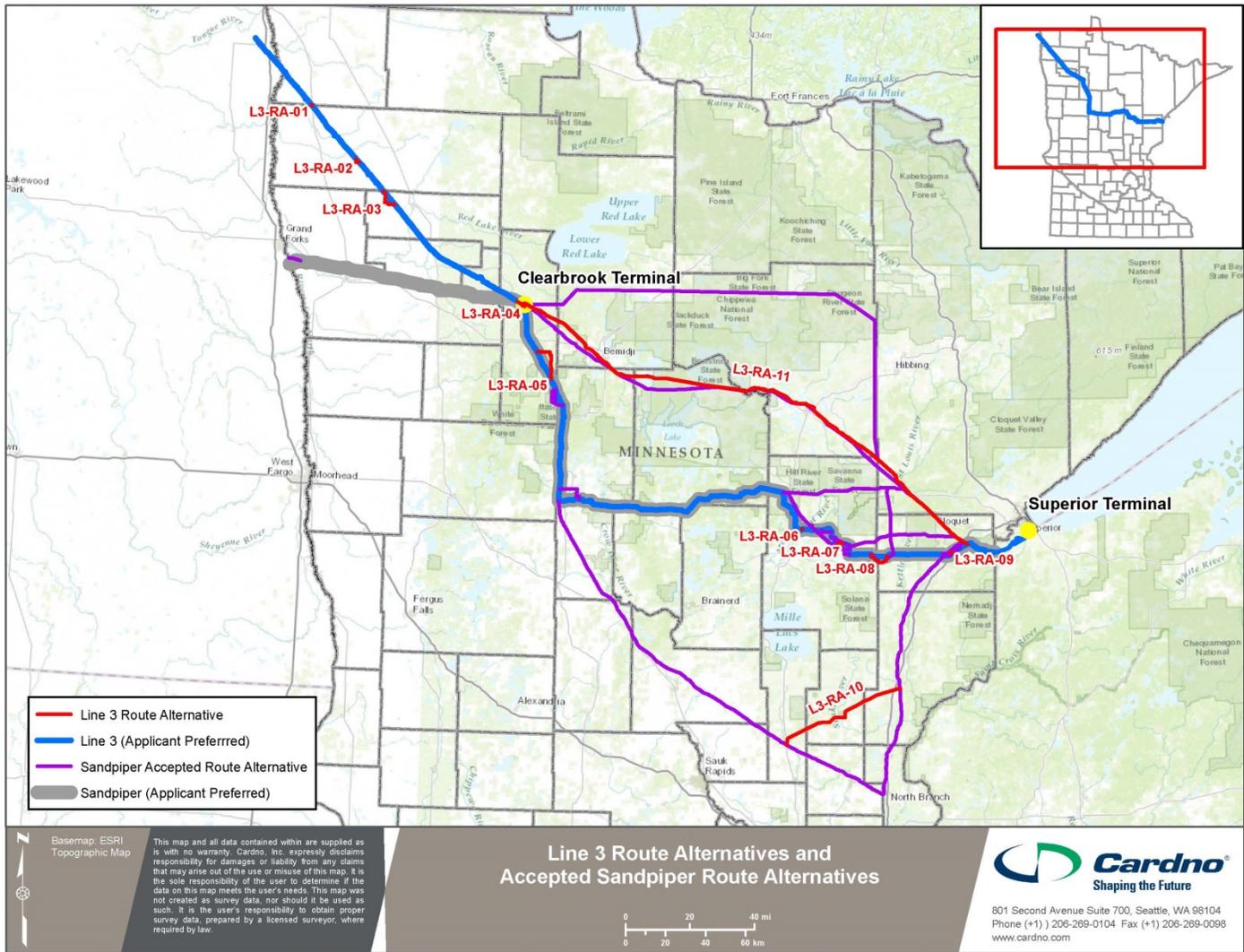


Figure 1 Line 3 Route Alternatives and Accepted Sandpiper Route Alternatives

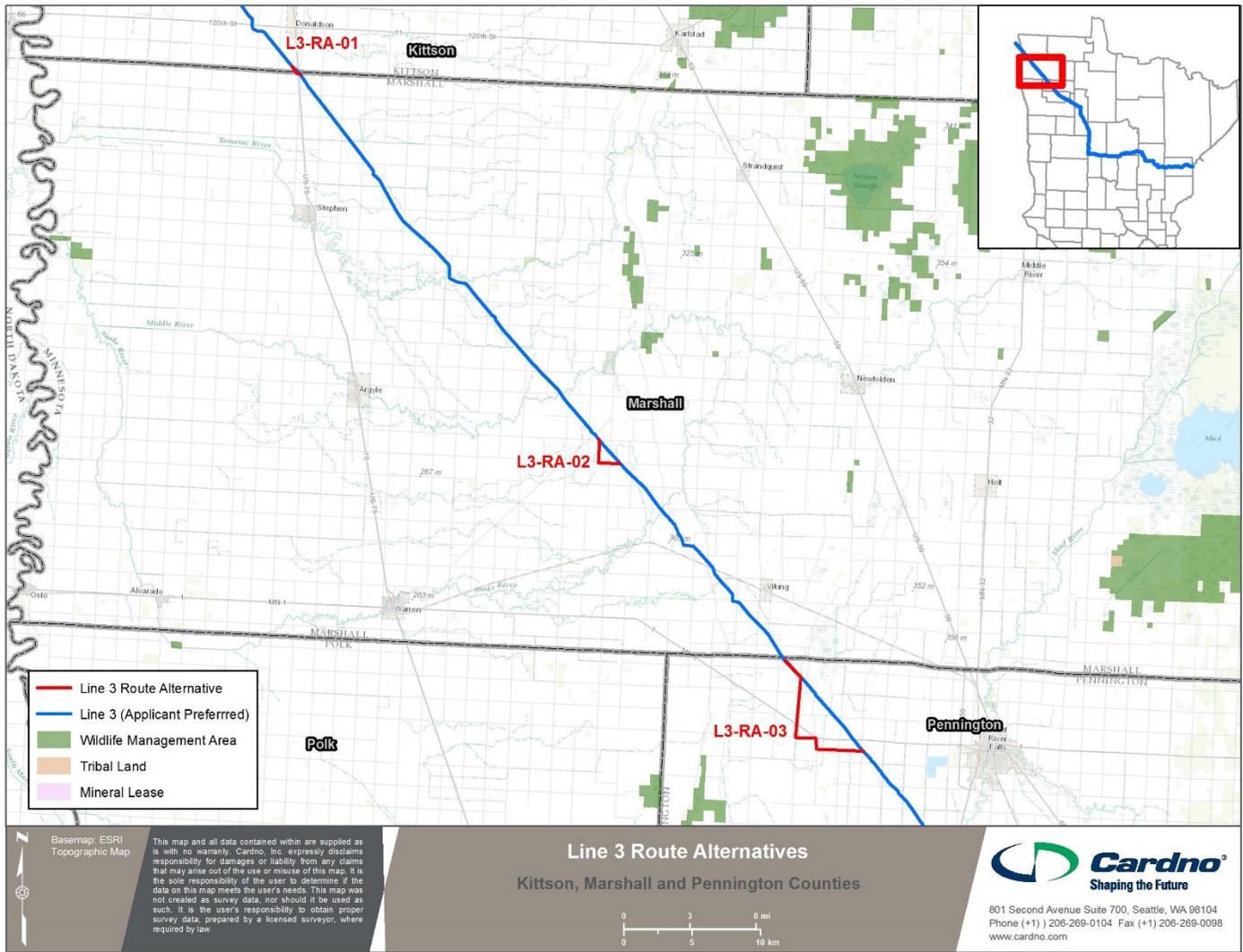


Figure 2 Route Alternatives L3-RA-01, L3-RA-02, and L3-RA-03

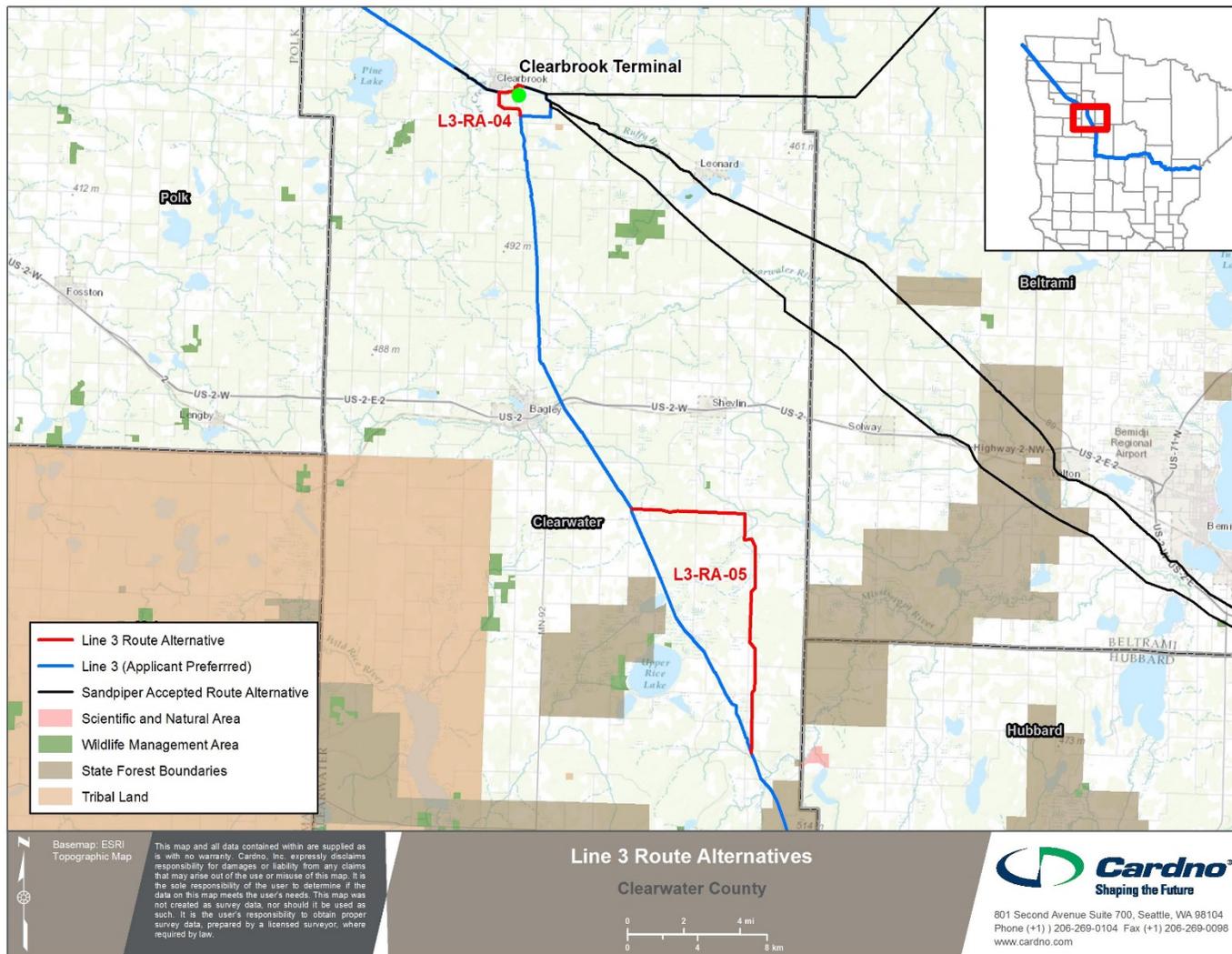


Figure 3 Route Alternatives L3-RA-04 and L3-RA-05

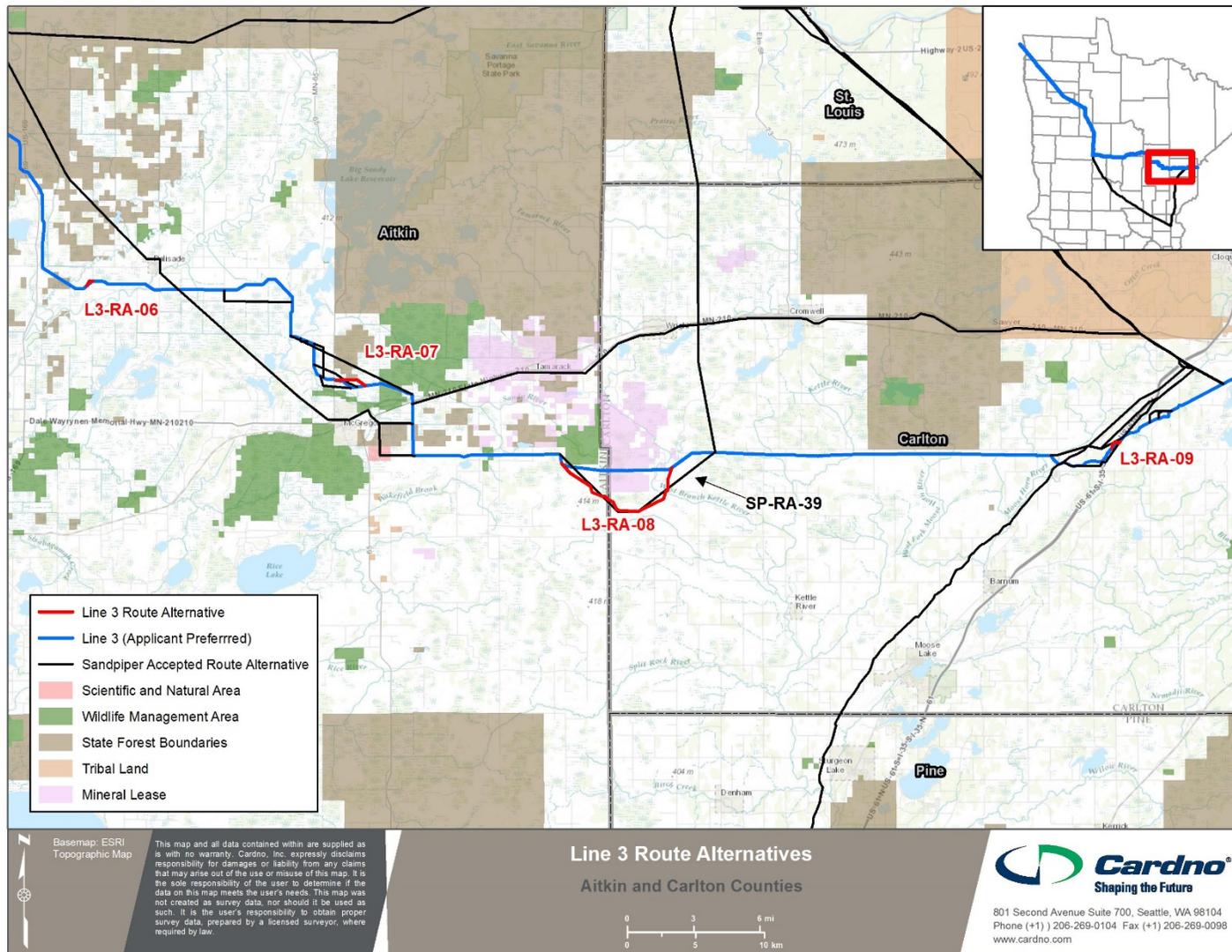


Figure 4 Route Alternatives L3-RA-06, L3-RA-047, L3-RA-08 and L3-RA-09

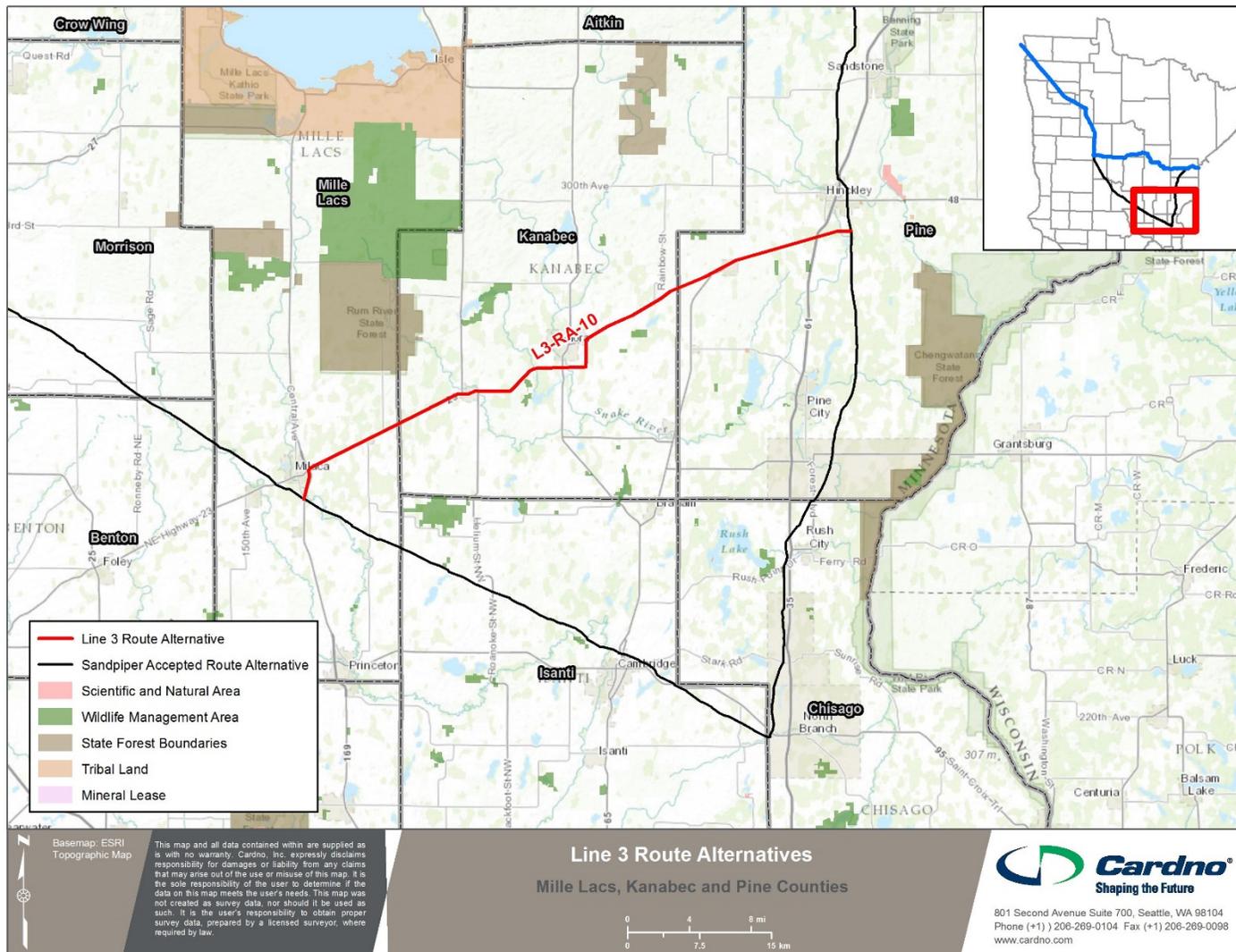


Figure 5 Route Alternative L3-RA-10

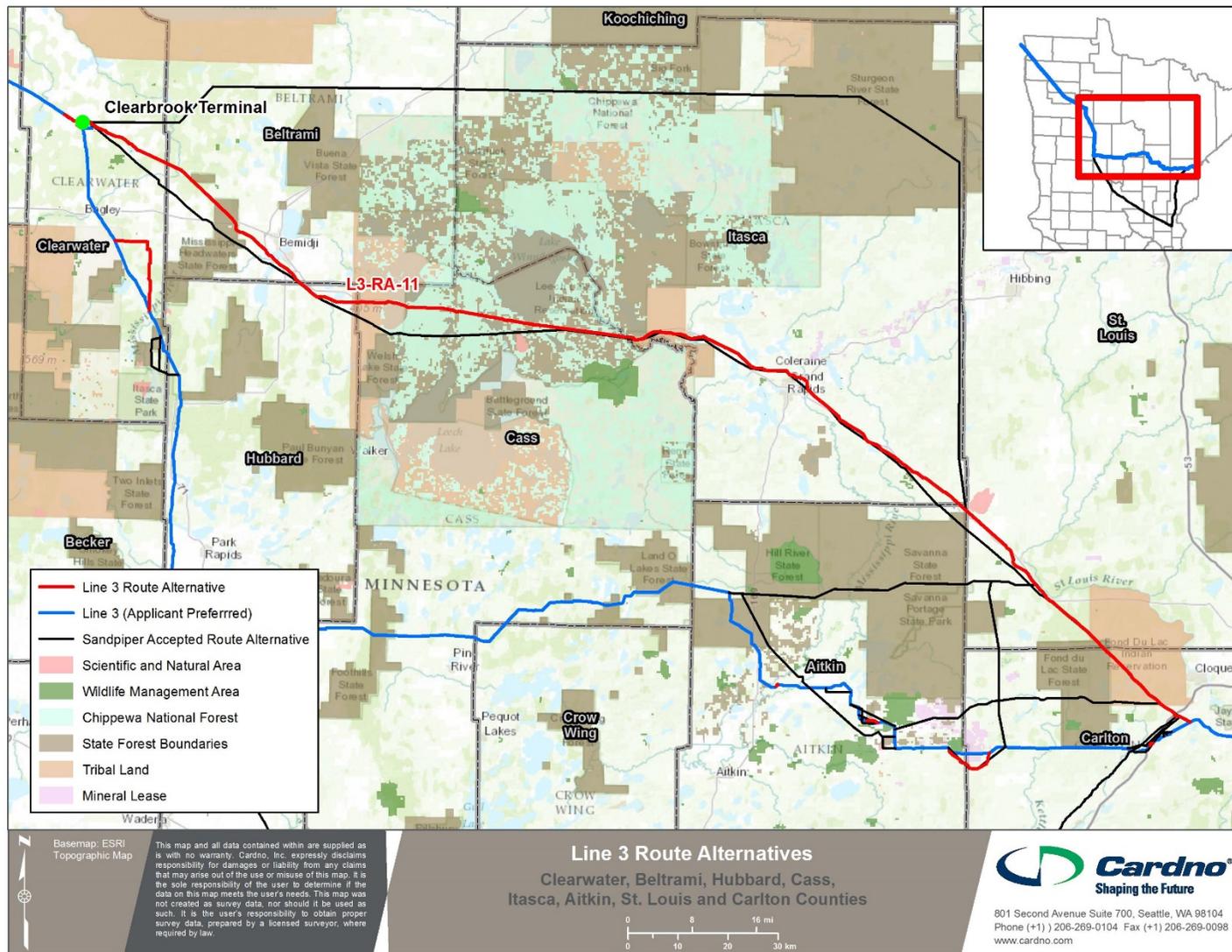


Figure 6 Route Alternative L3-RA-11

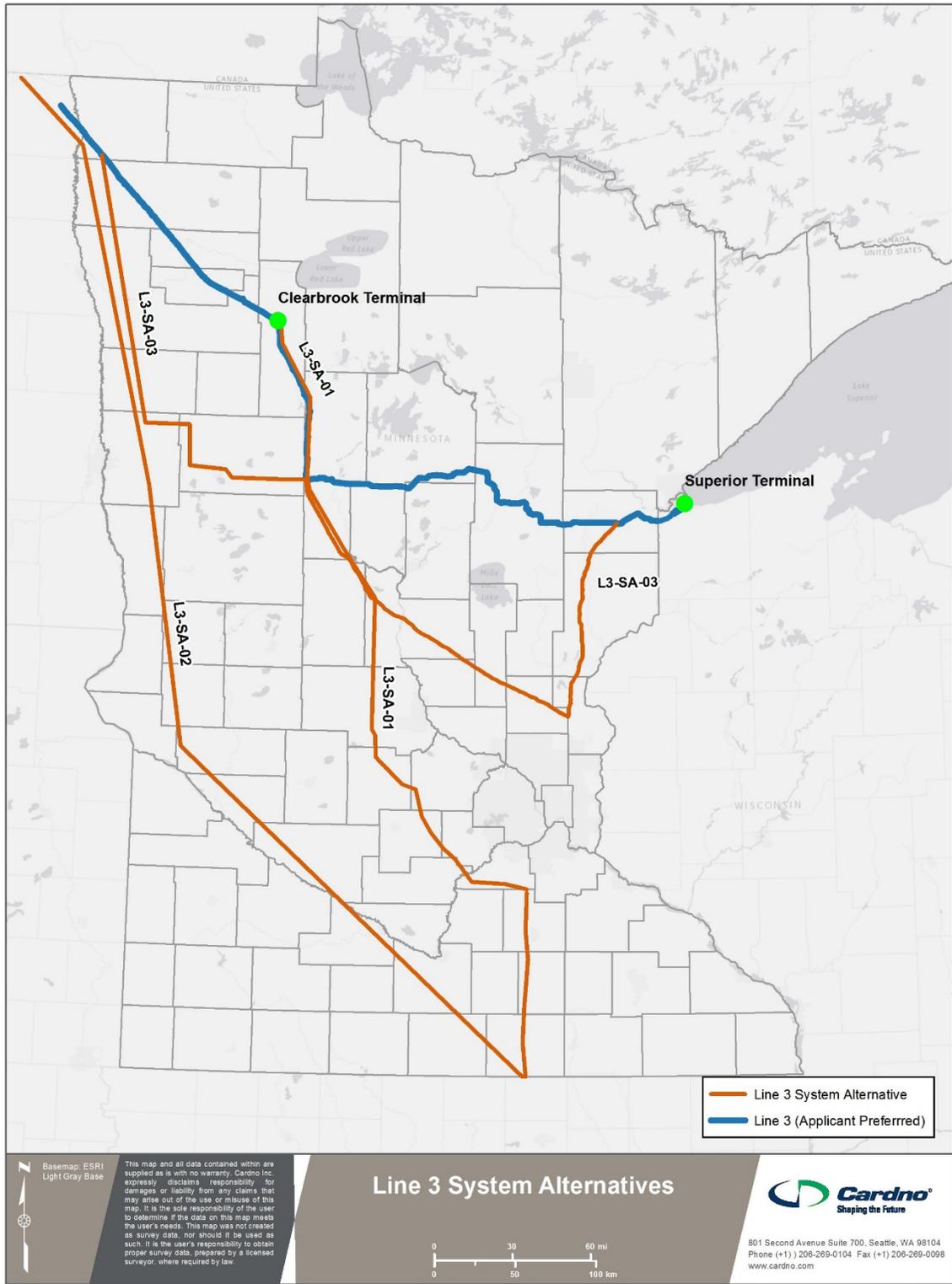


Figure 7 Line 3 System Alternatives

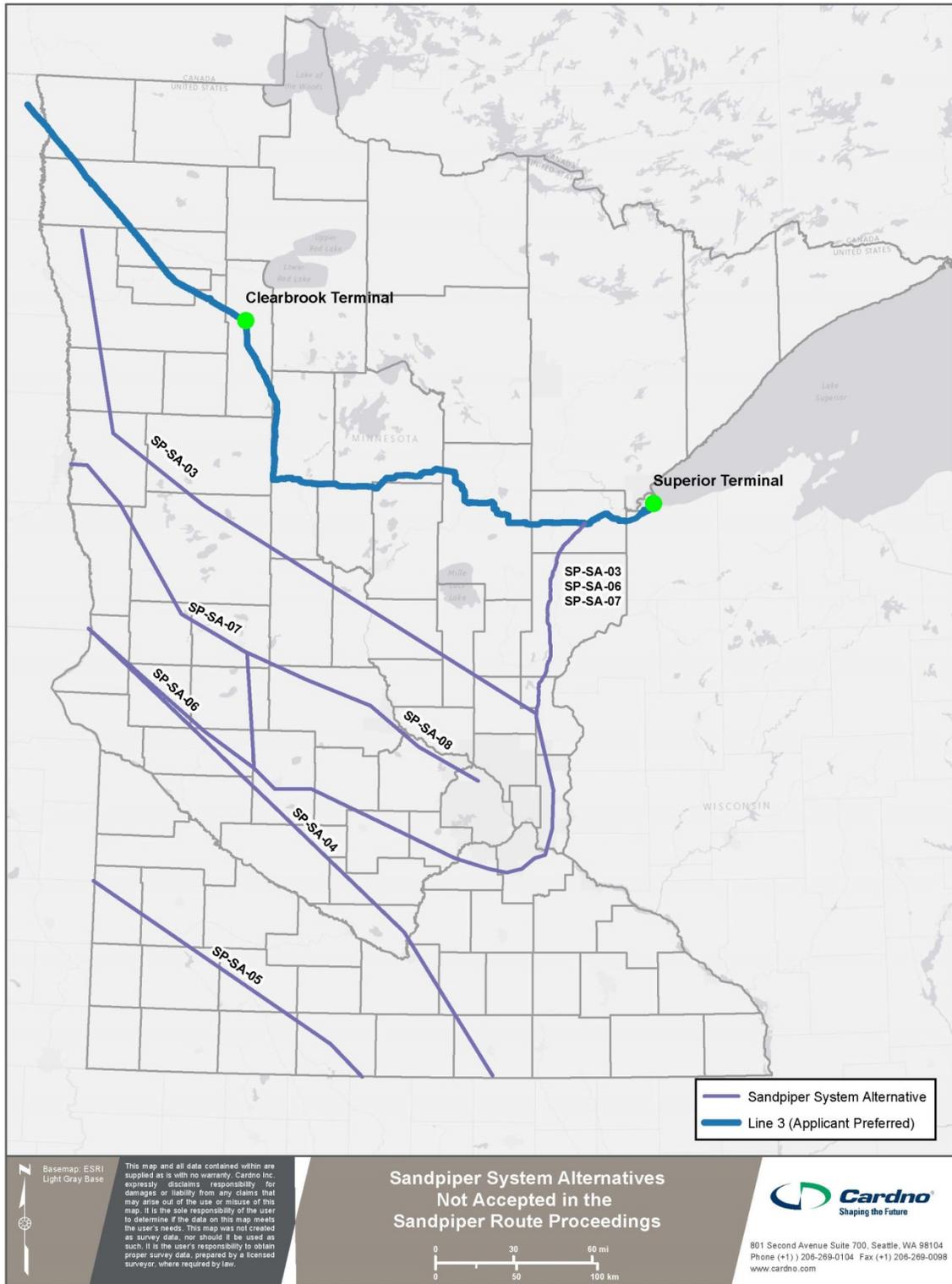


Figure 8 Sandpiper System Alternatives

References Cited

EERA (Minnesota Department of Commerce, Energy Environmental Review and Analysis). 2014. Sandpiper Alternative Routes Summary Report, Prepared by Minnesota Department of Commerce, Energy Environmental Review and Analysis staff with assistance from HDR, Inc. Accessed at: <http://mn.gov/commerce/energyfacilities/documents/33599/Sandpiper%20Alternative%20Summary%20Report-JULY-16-2014.pdf>.