



June 8, 2009

BY MAIL AND EMAIL

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Dear Mr. Callan:

On behalf of the Sierra Club, we submit the following comments on the Environmental Assessment (“EA”) for the Enbridge Alberta Clipper Petroleum Pipeline Project and Related Projects (“Alberta Clipper”). The Wisconsin Department of Natural Resources (“DNR”) announced in a May 20, 2009 “News Release” that the EA had been published and invited the public to submit comments on the EA through June 8, 2009.

The Wisconsin DNR cooperated with the United States Department of State (“DOS”) in the preparation of a federal Draft Environmental Impact Statement (“DEIS”) for the Alberta Clipper project as a whole. The Sierra Club, along with several other environmental conservation organizations, submitted written comments on the Alberta Clipper DEIS on January 30, 2009. Because the Sierra Club’s concerns about the Wisconsin section of the Alberta Clipper project mirror those of the project as a whole, those comments are attached and incorporated herein.

The Sierra Club is particularly concerned that, in preparing the Alberta Clipper EA, the DNR appears to have limited the scope of its environmental impacts analysis to local impacts. The Wisconsin Environmental Procedure Act, Wis Stat. § 1.11 (“WEPA”) requires DNR to consider all reasonably foreseeable significant adverse impacts on the human environment. Wis. Adm. Code NR 150.22(1)(e). As stated in detail in the attached comments, the Alberta Clipper will transport tar sands crude oil to US refineries, which will greatly increase greenhouse gas emissions (“GHGs”). This increase in GHG emissions will occur at every level of the project, from the mining of the tar sands in Canada, to the upgrading and refining of the tar sands crude oil, to the eventual end-use burning of the fuel by consumers. The Alberta Clipper will also exacerbate the many ongoing environmental problems associated with tar sands development, such as

destruction of boreal forests, pollution and depletion of water supplies, and impacts to wildlife. These, along with the other potential impacts discussed in the attached comments, should have been carefully considered in the EA and resulted in the preparation of a more detailed environmental impact statement (“EIS”).

The DNR also did not adequately demonstrate the need for the Alberta Clipper project. The most recent energy forecasts do not show an increased demand for Canadian crude oil in the coming years. The Obama Administration recently released an energy and environment plan that laid out its energy objectives aimed at reducing GHG emissions. The U.S. Congress is currently considering legislation with similar reduction goals. These, along with similar initiatives at the state and regional level, will have a direct effect on demand for the crude oil proposed to be transported through the Alberta Clipper. As further discussed in the attached comments, the DNR should have considered these factors in demonstrating the purpose of the project in the EA.

The Sierra Club believes, based on the inadequate demonstration of need for the pipeline and the significant impacts that the project is likely to have on human health and the environment, that the Alberta Clipper pipeline should not be granted the permits it seeks from the State of Wisconsin. Alternatively, we request that DNR issue a subsequent EA or an EIS that addresses these shortcomings, along with the additional concerns mentioned in the attached comments, and allows for further review and comment.

Respectfully Submitted,

/s/

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