

How to Comment on the SEIS for the Keystone XL Pipeline
(Eleven Ideas to into your own words)

1. Go to: <https://www.federalregister.gov/documents/2019/10/04/2019-21702/notice-of-availability-of-the-draft-supplemental-environmental-impact-statement-for-the-proposed#open-comment>
2. Begin your comment with this statement: “I am commenting on docket number DOS-2019-0033 and the draft supplemental environmental impact statement for the proposed Keystone XL Pipeline.”
3. Choose the NO ACTION ALTERNATIVE, which, according to the SEIS, would not construct or operate the Keystone XL Pipeline.
4. The SEIS actually does a good job of laying out the climate impacts of the pipeline. If we knew a disaster was coming to Earth because an asteroid was going to hit our planet, we’d do everything we could to avert the disaster. Yet this SEIS says we can expect increasing greenhouse gas pollution, which will lead to rising surface temperatures, changes in precipitation, sea levels, and increases in extreme weather events. This document alone should tell us to stop building pipelines.
5. The market analysis in the SEIS is deeply flawed. It presents the current conditions. It doesn’t project the external costs of a warming climate (costs of extreme weather and sea level rise, etc.). It avoids discussing the likely carbon taxes and other robust efforts future administrations will enact to wean our economy off carbon-heavy tar sands fuels.
6. The SEIS envisions a pipeline free from extreme weather events. That is wishful thinking, as the 2019 spring floods in Nebraska proved when it caused over \$1.3 billion, including \$449 million in damage to roads, levees, and other infrastructure. Moreover, the SEIS recognizes the changing climate and increasing hazards that will befall a pipeline built to inadequate standards:
 - “Studies reveal that the heaviest rainfall amounts from intense storms, including hurricanes, have increased by 6 to 7 percent, on average, compared to what they would have been a century ago.”
 - “Tornado activity in the United States has become more variable, particularly over the 2000s, with a decrease in the number of days per year with tornadoes but an increase in the number of tornadoes on these days.”
 - “. . . as the climate has warmed, the incidence of large forest fires in the western United States and Alaska has increased since the early 1980s and is projected to further increase in those regions, with profound changes to affected ecosystems and potential impacts on communities in those areas.” (pp. 3.10-14-15)
7. The SEIS underestimates the potential damage from extreme weather events, which are intensifying. Pipeline spills are more likely as our warming climate causes more frequent and more extreme hurricanes, tornados, rain bombs, and floods.
8. Building a new tar sands oil pipeline at this critical juncture in history makes no sense at all. The SEIS says, “Fossil fuel combustion is the predominant source of

greenhouse gas emissions in the United States, accounting for nearly 77 percent of cumulative greenhouse gas emissions since 1990.” We know that global greenhouse gas emissions are increasing, totaling 48,892 million metric tons of carbon dioxide equivalent (CO₂-eq) in 2014, up from 22,341 million metric tons CO₂-eq in 1970 and 33,823 million metric tons CO₂-eq in 1990 (World Resources Institute 2018). We know that limiting global temperatures to 2°C “would require the share of fossil fuels in primary energy demand to decrease in half by 2050, with renewable sources meeting 65 percent of the world’s energy needs.” (page 3.10-3) The NO ACTION ALTERNATIVE – not building the Keystone XL Pipeline – is the most important thing we can do to save the planet from runaway global warming.

9. The analysis finds that the increased transport of WCSB crude oil from the proposed project could result in an increase in greenhouse gas emissions relative to the No Action Alternative, which would in turn contribute to an increase in global atmospheric greenhouse gas concentrations.
10. Spills will be a problem with this 1,200-mile pipeline. In the U.S. we’re building a lot of oil pipelines these days, increasing “pipeline mileage” by 43 percent between 2010 and 2016. There have been some 1,584 onshore crude oil spills. These are not small puddles. In the past eight years, more than 270,000 barrels of oil have spilled from 39 spills, averaging 34,000 barrels a spill. The spill rate suggests we can bet there will be a spill every two years from the Keystone XL pipeline.
11. The leak detection system for the Keystone XL pipeline cannot detect small “pinhole” leaks, which will lead to massive pollution and damaged natural resources.
12. Our partners at Northern Plains Resource Council suggest that the SEIS “Minimizes the risks to the Missouri River, a waterway which functions as the lifeblood to the impacted region.” They suggest commenting on these five facts:
 - · The KXL pipeline would cross the Missouri River directly below the Fort Peck Dam spillway, which dramatically increases the risk for “scour erosion” of the riverbed due to the volume and velocity of water released by the dam. Over time, this erosion is likely to expose the buried pipe making a leak virtually inevitable. We have seen this happen with other pipeline spills, including here in Montana on the Yellowstone River.
 - · The KXL pipeline would cross the Missouri River upstream from the water intake for the Fort Peck reservation, which provides drinking water to that community and others in northeastern Montana (up to 30,000 people.) The SEIS significantly downplays the risks to these communities if a spill were to occur.
 - · The KXL pipeline would cross the Missouri River immediately upstream from the water intake used for regional agricultural purposes. The risks to these water users is minimized in this SEIS.
 - · In order to drill the pathway for the KXL pipeline under the Missouri River, horizontal drilling must occur. This process involves the use of fracking fluids. This process can result in fracking chemicals polluting

the Missouri River (and any other river on this route that involves underground horizontal drilling.)