



*Ashland Bayfield Counties*  
**LEAGUE OF WOMEN VOTERS**

PO Box 175  
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June 24, 2020

Kerrie E. Kuhne  
Chief, Permit Evaluation Western Branch  
Regulatory Office  
Corps of Engineers Detroit District  
477 Michigan Avenue  
Detroit, MI 48226-2550

RE: Corps File No. LRE-2010-00463-56-A19

Dear Chief Kuhne:

The League of Women Voters of Ashland and Bayfield Counties has, for some time, been studying a proposal by Enbridge Energy to build a new section of Line 5 that currently traverses the Bad River Reservation in far northern Wisconsin. One of our concerns is the potentially catastrophic consequences of a spill in that section of the line, which crosses many tributaries of Lake Superior, not far from the lake. So, too, then, we are concerned about the adverse impacts associated with Enbridge's proposed construction of a tunnel and pipeline under the Straits of Mackinac, and the disastrous effects on the Great Lakes should there be an accident where Line 5 crosses the Straits.

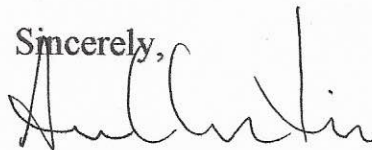
The sec. 404 permit Enbridge has requested would entail large-scale construction impacts resulting from blasting, tunnel excavation, and the discharge of millions of gallons of wastewater into the Great Lakes. More troubling, however, is that the permit would allow for a multi-decade extension of a horribly ill-conceived route.

Even if Enbridge complies with industry standards which regulate design, construction and operation of such a pipeline, the concern is that no system is accident proof and the company has experienced spills and leaks, many of which have been reported publicly. The disruption and destruction caused by the installation itself, added to the possibility of a leak, the likelihood of which became apparent just last week with the discovery of damage to the line under the Straits, make the project very dangerous in spite of careful engineering and construction procedures. And Enbridge's safety and spill history is not good. A spill at the Straits would contaminate the Great Lakes, the largest body of fresh water on the globe. Piping oil *through* the Great Lakes was a questionable idea in the first place, but before it is given a fresh lease on life, the potential consequences of doing so should be studied exhaustively.

Part of the Corps of Engineers' mission is to "reduce risks from disasters." In its Climate Preparedness and Resilience program, the Corps recognizes that it must "reduce potential vulnerabilities to the Nation's water infrastructure resulting from climate change and variability." The burning of fossil fuel is the leading cause of climate change. The construction of new fossil fuel infrastructure must be considered antithetical not only to the Corps' mission but to the health and welfare of all Americans.

Part of the League of Women Voters' mission is an informed citizenry. To that end, we believe the Corps' review of this permit application should include an EIS as required by the National Environmental Policy Act, to fully explore and inform the public about the potential environmental impacts of this project. Similarly, we also request that Corps hold a public hearing on this permit application, either online or in person, when it is again safe to do so. The opportunity for citizens to express their views on matters of great public concern is another vital facet of the League's mission. We hope that opportunity will be provided here.

Sincerely,



Anne Chartier

President, League of Women Voters  
of Ashland and Bayfield Counties