

December 14, 2020

PO Box 175
Ashland, WI 54806

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:

Thank you for holding a public hearing on the permit process for the proposed tunnel under the Straits of Mackinac and for this opportunity to comment. The League of Women Voters of Ashland and Bayfield Counties has been studying the proposal by Enbridge Energy to build a tunnel under the Straits, as well as a new section of Line 5 that would skirt the Bad River Reservation in far northern Wisconsin, for the past year. We refer you to comments we submitted previously (dated June 24, 2020).

In our previous comments, we described our concerns regarding the catastrophic consequences of a spill, whether that spill should occur in the Great Lakes or upstream, in one of the numerous stream crossings within the Great Lakes Basin. We also detailed some of the negative impacts of construction of the tunnel, including the discharge of millions of gallons of wastewater into the Great Lakes.

Since the previous comment period, underwater archaeological structures have come to the public's attention along the proposed tunnel route. It is our understanding that these objects are similar to findings in other areas of the Great Lakes and could be of historical significance. A full investigation of these findings must occur, as well as a thorough investigation along the entire proposed underwater route and surrounding buffer area as determined by the National Historic Preservation Act. We recognize the potential cultural value of these underwater structures and support full participation of Tribal Nations in the permitting process.

It has also come to our attention that geological formations along the proposed tunnel route have not been characterized correctly, suggesting, at the very least, incomplete geotechnical research.

We are left wondering whether this is incompetence or intentional avoidance on the part of Enbridge.

The bottom line is pipelines leak. Enbridge's Line 5, alone, has had approximately 30 leaks during its tenure, amounting to over one million gallons of oil. Routing a pipeline through the Great Lakes, upon which millions of people, dozens of cities, and two countries rely, is reckless at best.

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. Since the Corps has never conducted a full environmental review of Line 5, it is only appropriate that such a review occur now.

Ultimately, we urge the Corps of Engineers to deny Enbridge's permit request to construct a tunnel under the Straits of Mackinac. The Corps' mission in its Climate Preparedness and Resilience program is to "reduce risks from disasters" and "reduce potential vulnerabilities to the Nation's water infrastructure resulting from climate change and variability". We urge the Corps to recognize that 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.

Sincerely,

A handwritten signature in cursive script that reads "Sue Niemi".

Sue Niemi

President, League of Women Voters
of Ashland and Bayfield Counties