

Rebecca Terpening
Mid Michigan College
Public Health student
raterpening@midmich.edu

Ref: U.S. Army Corps of Engineers Project LRE-2010-00463-56-A19

Water Is Life

There is nothing I love more than a road trip to our Great Lakes coastline. I have many fond memories of looking for Petoskey stones with my family, camping with friends, and even day trips to take our dogs for their first swim. Even when I'm not on the beach, I can close my eyes, hear the waves, and feel the wind. Every Michigander has a spiritual connection to the Great Lakes. They are our greatest gift and we should protect them so that future generations can enjoy them. We live in the center, or the heart, of the freshwater universe. It sustains all living things and I will discuss the response-ability, I feel *we all have*, to protect this vital resource; because water is life.

There are many ethical issues when we look at the Line 5 pipeline. The one that I feel is the most important and should be acknowledged and respected is the 1836 Treaty with the United States Government and our Anishinaabek people. The United States Constitution considers Treaties the supreme law of the land. According to the Sault Tribe of Chippewa Indians the "1836 Treaty reserved the right to fish under tribal authority in treaty-ceded Great Lakes waters" (Treaties and the Nature of Treaty Rights). When the Enbridge easement agreement was established in 1953, the Anishinaabek people in Michigan were not involved. In fact, when the pipeline's Mackinac Straits Corridor Authority was established in 2018 by Governor Rick Snyder, he did not appoint any Tribal leaders to the committee. It wasn't until people voiced concerns that a Tribal representative was even appointed to the Pipeline Safety Advisory Board three months later. Thurlow "Sam" McClellan, chairman of the Grand Traverse

Band of Ottawa and Chippewa Indians stated, “We had that treaty before Michigan was even formed. Enbridge came in the 1950s. If the governor is meeting with anybody it should be with us. When it comes to Native Americans, we’re kind of pushed aside and treated as second-class people. We’re not — we were here first” (Balaskovitz).

In his book *A 21st Century Ethical Toolbox*, Anthony Weston states that ethics are when, “we think or act ethically when we take care for the basic needs and legitimate expectations of others as well as our own” (Weston 7). When I look at Weston’s definition, and the ethical issue of the 1836 Treaty not being respected, there are many who are not considering the basic needs and legitimate expectations of others; particularly the basic needs and legitimate expectations of our Anishinaabek people. The Straits are a sacred area for our tribes. Women bring life to this world, so the indigenous women are the traditional water protectors. Three of them recently found an Ice Age-era archeological discovery close to the Line 5 pipeline. Andrea Pierce and Robin Lees of the Little Traverse Bay Bands of Odawa Indians (LTBBOI) and Kelly Willis of the Saginaw Chippewa Indian Tribe, headed out for an independent look at the aging pipelines. Fred Harrington, Jr. from LTBBOI joined them and offered to let them use his Jiimaan; a large wooden canoe. What they discovered could be linked to something similar found by Beaver Island and in Lake Huron and could be a significant cultural site. Harrington wrote about these women, “This expedition is tribal sovereignty enacted. The impact of treaty-protected rights to waterways, a cultural canoe and determined water protectors is profound. Water is life and women are the water protectors. We honor and support their work” (Stebbins). The group requested a full archeological study to be performed, the very same day Enbridge said their tunnel project plan was 90% complete. The State of Michigan, the United States, Canada, and

Enbridge should respect and take care of the basic needs and legitimate expectations of our Anishinaabek people, and protect our waters because they are of special cultural significance.

One of the major arguments for shutting down the pipeline is that a spill from Line 5 would cause catastrophic damage in our Great Lakes ecosystem, which is why there is strong support from environmentalists. Keep in mind, millions of people use the Great Lakes for their source of drinking water. Imagine the public health threat from a pipeline leak in the Straits. The currents in the Straits are ten times as strong as they are at Niagara Falls. (Campbell) A spill in this location would spread quickly. Line 5 carries 23 Million gallons of crude oil and natural gas daily. (Campbell) Michigan State estimates damages would be close to 6 billion, with economic impacts North of 45 billion, not to mention, the plant and animal life that would be lost forever. How do you put a value on those things that cannot be replaced?

It also would not be the first time Enbridge had a spill in Michigan. Since the pipeline was put in, in 1953, Line 5 has had 1.13 Million gallons spill in Michigan, none in the Straits. (Campbell) In 2010, Enbridge's Line 6B, spilled into the Kalamazoo River, dumping over 1.2 Million gallons of crude oil, over a 17 hour period before it was shut off. Enbridge's warning system alerted them of a pressure change, but they assumed it was a false alarm and ignored it. It was **the largest freshwater inland water spill in the United States** and it cost over \$1.3 Billion dollars in cleanup and restoration. (Campbell).

These are the same waters that our Anishinaabek people use for fishing and harvesting, per their Treaty rights, which is a way of life for them. The cultural aspects in this conflict of values, should be acknowledged and respected and take higher precedence when we look at other values at play here. There are many environmentalists who are fighting alongside the Tribes in Michigan, who support them in their water protection efforts, and who also value a clean and

healthy ecosystem. On the other hand, there are also people who want Michigan's economy to thrive with lower fuel costs and jobs, not to mention the \$55 Million dollars that come into the State of Michigan from Enbridge's property taxes. (Campbell). Enbridge pays around \$8 Million in salaries to 103 employees in Michigan. (Campbell) Of course, if there was a catastrophic spill, the job loss from our tourism industry alone, would surpass those 103 employees currently employed by Enbridge. **I also wonder, when the State of Michigan's climate goals are to be carbon neutral by 2050, why are we even considering a 99 year lease for a Canadian oil company who wants to propose building a tunnel that will take ten years to build?** When we look at all of the major sides of this controversy, I believe it is time to pursue alternative energy sources instead of prolonging the use of fossil fuels, especially when it goes against our current climate goals we are striving to meet.

When we take a look at this issue and the Ethics of Person, I believe our Indigenous people have fundamental rights, human rights, that are being ignored. According to Weston, he defines the Ethics of Persons as,

The Ethics of Person affirms that persons are special, precious, and have a dignity that demands respect. *No one is to be reduced to a mere means to others' ends*. Social relations require fairness, justice, and equality. Human and civil rights are essential too: they secure the space in which each person is recognized and can flourish. (Weston 125)

If we look at big oil companies like Enbridge, or even the Dakota Access Pipeline, they often go right through Indigenous lands. In Northern Minnesota, Winona LaDuke has been leading the resistance, with other water protectors, to try to stop the expansion of Enbridge's Line 3. The mission of her organization, Honor The Earth, is to educate the public and bring awareness on Native environmental issues. Honor The Earth uses, "Indigenous wisdom to ask people to

recognize our joint dependency on the Earth and be a voice for those not heard” (Our Mission). Similar to the Straits, Enbridge’s Line 3 crosses the Mississippi River inside of their Treaty lands, as well as 200 other bodies of water, and it threatens the White Earth Ojibwe people’s ability to harvest wild rice, which only grows in clean water. This also impacts millions of people’s drinking water and is a huge source of income for families. The State of Minnesota allowed Enbridge to draw out 500 billion gallons of water for the construction of their new line. Currently, the White Earth Ojibwe tribe is fighting back with the first *rights of nature* case in Tribal courts where Manoomin (wild rice) or “the food that grows on water” is the plaintiff. The lawsuit states the treaty rights they have in place which protects their rights to harvesting wild rice, “wild rice “possesses inherent rights to exist, flourish, regenerate, and evolve, as well as inherent rights to restoration, recovery, and preservation” (Parrish). If we look at Weston, I think that Manoomin has a good case for rights under Ethics of Person because it is *special* and *precious* and it should be *recognized* so the White Earth Ojibwe people *can flourish*.

Members of Honor The Earth were also instrumental in the fight against the Dakota Access Pipeline that runs through the Standing Rock Indian Reservation and across the Mississippi River, Missouri River, and many inland lakes, in addition to their sacred burial grounds. LaDonna Brave Bull Allard, Native American Dakota and Lakota historian, genealogist, and a matriarch of the water protector movement, called out for anyone to stand with them in prayer to protect their lands and sacred ground. People joined from all over the Country to stand with these courageous women of Standing Rock, and a camp was established on the site; where everyone was family. It was the first time a gathering of this many tribes had come together since The Battle of Little BigHorn. There are two prophecies that the indigenous people talk about. The first one is that a black snake will come to poison Mother Earth. The

second is that the women, as the guardians of the waters and protectors of all life, would rise.

These prophecies have been shared for generations and are now coming true. Allard's story was shared in the film, *End of the Line: The Women of Standing Rock*. She passed away recently but the fight, and her legacy, continues in her honor. (End of the Line)

If we look at this issue from the perspective of the Ethics of Person, I think of Immanuel Kant's Categorical Imperative. Kant believes people should follow a moral compass of a set group of rules. Kant states what is good for me, should also be good for you. People should not use others as means to get to an end result. People should use objective reasoning, not subjective reasoning, as we are all an end and never a means only. Some who use others as a means, need to consider the fact they too have the means to get to the end result. This would be subjective reasoning, using others to get what you want. The Anishinaabek have rights, just like everyone else, yet their fight to protect their Treaty rights and way of life is not listened to or respected. Even though Kant considers that we must follow the set group of moral laws in place, doesn't mean that everyone will. There will always be selfish people, for example, selfish corporations, who only think of themselves or a small group of people that their actions will benefit. They are not thinking of everyone when they make their decisions. Did Kant consider that not everyone will have the same set of moral laws depending on where they live or the environment that surrounds them? I guess to define what is good or bad, Kant wants us to simply ask if it is good for everyone involved and does it create the maximum amount of happiness. Enbridge is only looking at a way to get to the end by using the Anishinaabek as means. If we don't have laws in place that punish corporations for their unethical behavior, then are we telling them that these actions are okay?

When we take a look at the Ethics of Happiness, it teaches us that we should find the balance between pleasure and suffering. Not only considering our own personal happiness but the happiness of others as well. Happiness is the end goal of all human action. Any action that doesn't bring happiness, should be disvalued, because it counteracts happiness. Both individuals who want the pipeline shut down and Enbridge who want to build the tunnel and continue as normal, both have levels of happiness that should be measured. According to Weston, the question to ask, is a corporation's happiness more valuable than a person's? Ethics of Happiness is a social issue because our own happiness is intertwined with the happiness of others. Jeremy Bentham felt that utilitarianism was a "formula of the greatest good of the greatest number" for which he called the Principle of Utility. Economists use a form of this for what they call Maximize Utility. (Weston 183) John Stuart Mill elaborated on Bentham's utilitarian views. Mill felt that this ethic appeals to our social nature. Mill said, "that there should be harmony between his feelings and those of his fellow creatures....This conviction is the ultimate sanction of the greatest happiness morality" (184). When I think of the indigenous water protectors, I think of Esperanza Guisán who was a professor of ethical and political philosophy. She wrote about Hedonism and explained that for a hedonist, "we are the others and the others are us...(hedonism) means a *permanent* and *radical* revolution" (190). *Permanent* in a sense that the work is never done and *radical* in the sense that the revolution's purpose is to attack the root of all problems as well as *radical* in the degree and profoundness of the change it can bring. Guisán says hedonists think not only of the best of the world around them, but also the best of the imagined world. They wish to end all the suffering in the world because it can lead to harmonious, blessed, and free people. Their God is a human being. They want every human

being to be able to say, “Here is my only norm: to be happy, and infect others with happiness” (191).

When looking over Guisán’s views on this radical and permanent movement for change, I think of the water protectors and environmentalists out there who are fighting big oil companies like Enbridge. The fight won’t be easy and the change we all want won’t happen overnight. We must stand together in solidarity with our brothers and sisters to help one another reach that happiness we all deserve; so we can all live a happy, healthy life. Suffering is bad, but is it possible to eliminate all of it? Probably not, like Guisán describes as “a deceitful monster with multiple heads and, when one is guillotined, others threaten to reemerge” (191). As a hedonist, it is something one must always work towards achieving because suffering is, as she says, absurd. I’m involved in progressive politics and I can relate to the never ending fight for justice for all. Even the issue of fighting for clean drinking water is often considered a radical idea by those who put our laws into place, but they are not so radical when you talk to regular people. Talk to the people living in Flint, MI about that. These are long standing revolutions without an end in sight, trying to reach what seems like Guisán’s description of an *imagined world*. It’s hard thinking of all the barriers our indigenous people have faced fighting for justice, especially the push back from Enbridge. I am proud to stand with my coalition of friends, as we rise to the occasion for this *permanent* and *radical* revolution.

The Seven Generations principle, that our Indigenous people value, is often associated with the Ethics of Relationship, but I see how it can also apply to our Ethics of Virtue. The Ethics of Virtue are the moral values that uphold our character. Depending on what culture or religious background a person comes from, they may hold different values on those character traits. The Indigenous people have always held a strong spiritual connection with Mother Earth

and there is a lot that we can learn from them. In the Seven Generations Principle, one must think of themselves in the middle. They feel they are responsible for our future generations and they have a duty to honor those who came before them. When talking about the planet, Weston says,

Thus we are beginning to rethink our practices and to consider new questions about sustainability. How can we live so as to pass on an Earth in as good (better yet, better) shape as we found it? As we begin to comprehend the fact that we may be altering the very planet as a whole, seemingly so immense and for so long taken for granted, we find that ethics now reaches into the biosphere. What does biospheric good citizenship require? (100)

A fundamental part of the Ethics of Virtue is responsibility. John Sullivan calls it being *response-able*. Responsibility is a key virtue alone, and it is also a means for other virtues to grow and blossom from. Sullivan's main point of this writing is that he believes people have both a small-minded view of the world, and a large-minded view, both of which exist at any moment. A small-mind set person may be biased and closed off from the big world view; missing the big picture. A large-mindset person is able to live in a larger world. They are more mindful of their reaction to stimuli. Sullivan calls this "response-able" or able to choose how we respond in a way that benefits everyone. With practice, we can shift from a small-mind set to a large-mindset. Living our life with a larger mind set can bring us more compassion, forgiveness, and hope (233-236). If we look at the Seven Generations Principle and Sullivan's key virtue while thinking of the fight against Line 5; we all have a *respons-ability* to be good citizens and protect Mother Earth. This will in turn protect our future generations.

Sullivan says it is Confucius that says we have both a small-minded person-in-us and a large-minded person-in-us existing at the same time. If this is true, then wouldn't people react less often than they do? If they are large minded at that same moment when they choose to react to something, why is it they don't choose the proactive way in responding? If we are *response-able*, we should know the better choice in any situation. Sullivan says we can get to a large-mindset by being proactive and practicing how we respond. I think what he should have stressed on is that it can be a learned way of responding to others. Maybe some people don't know how to respond in a large mind way until they are taught how to? If they are living in their small world view in their mind, they see their point of view as the truth. Why would anyone want to change what they believe to be true? They may never question the truth, therefore never see the need in changing. This is part of the problem we face currently in our ability to change over to alternative energy sources. Change is hard, if you think supporting the big oil industry is the only way.

With the Ethics of Relationship, there are many relationships at stake, when looking at the issue of Enbridge's pipeline going through indigenous territories. Weston says the Ethics of Relationship "encompasses those moral values concerned with our connections to others...we grow up in families, take on traditions and heritages, and live within and depend upon human and also *ecological communities*" (245). Aldo Leopold, an early environmentalist, focused on a new and unexplored topic of land ethics. He talks about ethics ecologically and philosophically which are related to individuals or relationships but that our relationship with the land in which we live is not clearly defined. He says, "The extension of ethics to this third element in human environment is, if I read the evidence correctly, an evolutionary possibility and an ecological necessity" (261). When I think of Weston's definition of the Ethics of Relationship which

includes our relationship to our ecological communities, I think of Leopold's writing on The Land Pyramid. Leopold talks about the layers of evolution that include man, plant life, animals, soil, water and how they are all interdependent on one another to continue the circuit of electricity that is never ending. A sustainable circle of life. With one part missing, the pyramid evolves itself, and all of its other parts, slowly in order to stay alive. Due to man's invention of tools, it has made it easier to quickly desecrate parts of this pyramid, faster than evolution can take place.

There are many environmentalists that would agree with Leopold's way of thinking, like Patty Peek from the Straits of Mackinac Alliance, and full time resident in St. Ignace, MI. At a recent public hearing with the Army Corp of Engineers regarding the Line 5 Tunnel project, she voiced her concerns and stated her home is right next to the pipeline. One of her concerns was what chemicals may be contaminating their wells, which is a big concern considering the high lake levels that already cause a great deal of ground saturation. Most of the wastewater, millions of gallons of it, will be discharged into the lake, about a football field away from the shore where she lives. With the surface current moving west southwest, this puts her area at the highest risk. Peek stated in the public hearing,

This means the wastewater discharge will most likely be dispersed among the shallows of the north shore. The shoreline there is a marshy home to spawning fish, small amphibians, other aquatic species and many shorebirds and waterfowl. There are eagles nesting in the area. All of these species would be at risk for any contamination of the water. Enbridge will be required to self-monitor and self-report if any issues arise. I wish I could say that I trust them to do everything to keep our water safe but given their past performance, I cannot. (Peek qtd in Official Transcript)

Others at the hearing voiced concerns over the coastal endangered species that exist on the coastline like Houghton's goldenrod and dwarf lake iris (both of which Enbridge commits to only relocating 50% to mitigate loss); violations of The Clean Water Act; and the concern for the hundreds of thousands of birds that migrate through the Straits every year. Jennifer McKay from Tip of the Mitt Watershed Council brought up the archeological find as mentioned earlier, "There are significant prehistoric remains dating back 10,000 to 8,000 years before present on the lake bottom that are extremely vulnerable to disturbance and would be obliterated without a trace by the proposed tunneling. These are a unique piece of Michigan's past that should not simply be brushed aside and destroyed" (McKay qtd in Official Transcript). Whitney Gravelle from the Bay Mills Indian Community pointed out that Enbridge knew and ignored the finding of this cultural site. Gravelle states, "A whistleblower technician has notified the public in a letter to the State Historic Preservation Office that Enbridge's cultural survey ignored relevant evidence of cultural sites and prehistoric use, even after the technician brought this evidence forward" (Gravelle qtd in Official Transcript).

Leopold says, "A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise" (Weston 264). The problem sadly is, not everyone value's the planet and wants to protect it, or sees the imbalance a spill would create on our entire Great Lakes ecosystem.

The two main clashing values that come from this issue, are the values held by our indigenous people and the environmentalists who stand with them who want to protect our waters with the hopes of the Treaty rights being respected as well. The other clashing value is that from an economic standpoint. Enbridge has the money to do whatever they want and can spend huge amounts of money fighting the issue. They also have the money to build the pipeline

somewhere else; or take the oil through Sarnia and connect it to Line 6B across lower Michigan, avoiding the Straits all together. They could even invest their own money into alternative energy options that are cleaner and healthier for all involved. They too have a responsibility; specifically to shareholders. Because the pipeline crosses over international waters, as well as multiple States, it has moved on to the Federal courts. And even then, depending on what our courts decide, it is still an international issue. In the fall of 2021, the Canadian government invoked the 1977 treaty that prevents Michigan or the United States government from disrupting the operation of Enbridge's Line 5 pipeline. Michigan still has laws in place that state our government has to protect our public lands, which also includes our waters. Over the years we have been fighting in many wars overseas over oil, and we've got one on our hands right here at home.

To search for solutions, we must sometimes split the difference and meet in the middle of our conflicting values. We can focus on our mutual interests, and look past our positions. We must work together to find common ground, and oftentimes ways to satisfy both at the same time. It's not an easy issue, and it is a wicked problem indeed, but we are now faced with some big decisions. To find them, maybe we can turn to the ethical families and have a broad discussion and look at carefully measured values to find the answers.

Every Ethics family is important with this issue. I wish I felt confident enough to find factual sourcing for Enbridge's side to find out what their values all are beyond economic ones. They have spent so much money on advertising here, and I honestly can't say that anyone is wrong with their feelings of not trusting them. They don't exactly have a great track record here. I feel Ethics of Person for instance, as people, even that beautiful bald eagle, and the Manoomin as a plaintiff, have rights to flourish and grow. We each have a strong spiritual connection,

feelings, memories, all tied into the water. We feel that as individuals, but that is also a relationship. The Ethics of Happiness, we all want to see the world in a harmonious peaceful way, but not everyone has the same definition of happiness. Sometimes it is watching your stocks rise on the open market, while for a honey bee, it may be the happiness in finding that endangered dwarf lake iris after a long migration north. In the Ethics of Virtue we all have a *respons-ability* and duty to protect Mother Earth, which is also a special relationship. Our lawmakers and internationally appointed officials, also have a duty to respect laws that exist, or make time for some large mindset discussions on how to make things better than they are. When thinking of Guisán's "we are the others and the others are us" also makes me think of my relationships I have built through this coalition of water protectors. We are family and we are stronger together. The Ethics of Relationship is key, because of our connection to all living things that exist with us; we all depend on the water. People can disagree on many things but water shouldn't be one of them because-Water *is* life.

One of the Seven Generation Prophecies that talks about the seventh generation after first contact with European settlers, where indigenous youth and allies from all races will come together to enact new hope for healing and rebirth for Native people and Turtle Island. Lakota leader Crazy Horse spoke of his vision of this prophecy,

Upon suffering beyond suffering, the Red Nation shall rise again and it shall be a blessing for a sick world. A world filled with broken promises, selfishness and separations. A world longing for light again. I see a time of seven generations when all the colors of mankind will gather under the sacred Tree of Life and the whole Earth will become one circle again. In that day there will be those among the Lakota who will carry knowledge

and understanding of unity among all living things, and the young white ones will come to those of my people and ask for this wisdom. (Crazy Horse qtd by Wittle)

That time that Crazy Horse is talking about, is now. Think of everything that Crazy Horse and his people went through when faced with the American government, and yet he dreamed of the hope in that peaceful prophecy. I also hope and dream of the future when the Anishinaabek people's rights and culture are acknowledged and respected and that people will learn to respect all living things, including the water that gives us life. We must inspire those to change by the love that we give.

In order to be the change you wish to see in the world though, you not only have to do something about it, *you have to live it*. So far in life, I feel my moral compass has led me in this direction already, but now I have the ethical tools to be the change, ethically. We must develop our own ethical habits and beliefs and include them with others who might not have those same ethical tools, or any at all, and we must do this right now. We must live it. Imposing my views on other people doesn't make the world a better place, that change comes from ethics in action. Weston states, "People will not live in harmony with nature until they also come to live in harmony with each other" (Weston 539). Maybe that is the answer we are looking for when we are faced with wicked problems like Line 5. All we need is to just spend a little bit more time with Mother Nature to become a better version of ourselves. A better version of ourselves can make all the difference.

Works Cited

Balaskovitz, Andy. "Michigan tribes say Line 5 pipeline tunnel plan ignores treaty rights".

Bridge Michigan online. 2 November 2018.

<https://www.bridgemi.com/michigan-environment-watch/michigan-tribes-say-line-5-pipeline-tunnel-plan-ignores-treaty-rights>

Campbell, Bob. "A Cheat Sheet To The Enbridge Line 5 Controversy". Bridge Michigan online. 27 June 2017.

<https://www.bridgemi.com/michigan-government/cheat-sheet-enbridge-line-5-controversy>

End of the Line: The Women of Standing Rock. n.d.

https://www.endofthelinefilm.com/?fbclid=IwAR0q9QDWsqM8_cnDHS0_aj5ujVrUo64WB5R3iS26ATOMBqS-HygsuJREYNU

"Five Things You Need to Know About The Enbridge Line 5 Oil Pipeline Shutdown". YouTube uploaded by Oil & Water Don't Mix: Keep Oil Out of the Great Lakes. 9 May 2021.

<https://youtu.be/SnKUxBrch2A>

Our Mission. Honor The Earth. n.d. <https://www.honorearth.net/mission-vision> and

<https://www.honorearth.net/river>

Parrish, Will. "'They Screwed Up Our Lake': Tar Sands Pipeline is Sucking Water from Minnesota Watersheds". The Guardian. 19 September 2021.

<https://www.theguardian.com/environment/2021/sep/19/tar-sands-pipeline-minnesota-lakes>

"State Agencies Release Independent Risk Analysis of Potential Enbridge Line 5 Spill." US Fed News Service, Including US State News. 22 July 2018. *ProQuest*.

<https://www.proquest.com/newspapers/state-agencies-release-independent-risk-analysis/docview/2072885039/se-2?accountid=35715>.

Stebbins, Laina G. “Tribal-led Line 5 investigation unearths ancient cultural artifacts”. Michigan Advance. 14 October 2020.

<https://michiganadvance.com/2020/10/14/tribal-led-line-5-investigation-unearths-ancient-cultural-artifacts/>

Official Transcript. “United States Army Corps of Engineers Public Hearing on Enbridge – Line 5 Tunnel”. File LRE-2010-00463-56-A19. 7 December 2020.

https://www.lre.usace.army.mil/Portals/69/docs/regulatory/EnbridgeLine5Tunnel/Transcript_USACE-Hearing_2020_1207.pdf

“Treaties and the Nature of Treaty Rights”. *Sault Tribe of Chippewa Indians*. 28 January 2017.

<https://www.saulttribe.com/history-a-culture/treaties>

Weston, Anthony. *A 21st Century Ethical Toolbox*. 4th ed. New York: Oxford University Press, 2018.

Whittle, Joe. “‘We Opened Eyes’: at Standing Rock, my Fellow Native Americans Make History”. The Guardian. 30 November 2016.

<https://www.theguardian.com/us-news/2016/nov/30/standing-rock-indigenous-people-history-north-dakota-access-pipeline-protest#:~:text=There%20is%20a%20prophecy%20among,Native%20people%20and%20Turtle%20Island.>