

October 14, 2022

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

I am writing on behalf of the Michigan Manufacturers Association regarding Enbridge Energy's application for a Department of the Army permit to construct the Line 5 utility tunnel beneath the Straits of Mackinac.

MMA membership accounts for approximately 1,700 small, medium, and large manufacturers located throughout the state, representing Michigan's largest economic sector. Our members drive the state's economy and provide livelihoods for more than 635,000 Michigan citizens and their families. Through our work, MMA and its members share a common goal to be good stewards of Michigan's resources and good neighbors to the communities in which we live.

We have a vested interest in the outcome of the building of the Great Lakes Tunnel. Energy, including its supply, reliability, and affordability, underpins all aspects of manufacturing. Energy costs are one of the top expenditures of production for everything from automobiles and solar panels to personal protection equipment. Energy costs affect not just the manufacturing process, but also the transportation of raw materials to our manufacturing facilities – and finished products to their markets within the state and beyond. Accordingly, energy costs are a major contributing factor in Michigan's ability to retain a strong, globally competitive manufacturing sector and attract new investment by manufacturers looking to locate or expand here.

The scope of the Corps' Environmental Impact Statement should focus on assessing tunnel alignments across the Straits. Independent experts working on behalf of the state have determined that the Tunnel Project is the best, most viable solution for meeting environmental protection, energy delivery, and economic prosperity solutions. Alternatives to replace Line 5's crossing of the Straits, such as installation of a new pipe on the lakebed, would result in significant environmental impacts to the Great Lakes, such as dredging or fill. Further, non-pipeline alternatives are not feasible to connect Enbridge's existing Line 5 facilities on either side of the Straits. Infrastructure does not exist to support the necessary truck, rail, or barge traffic to replace the job currently done by Line 5.

These non-pipeline alternatives *use* fuel to *move* fuel, would have higher greenhouse gas emissions, and likely result in a higher frequency of incidents on a per mile basis. The Tunnel Project is the right plan for the environment and Michigan. It will help ensure extra layers of safety and environmental protection in our waterways without compromising the delivery of the energy on which Michigan depends.

Thank you for the opportunity to provide comment on this important project. I appreciate your consideration.

Sincerely,



Caroline Liethen
Director of Environmental & Regulatory Policy