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VIA ELECTRONIC FILING

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Lt. Col. Brett Boyle, Commander
U.S. Army Corps of Engineers Detroit District
Line 5 Tunnel EIS
16501 Shady Grove Road
P.O. Box 10178
Gaithersburg, MD 20898

RE: Comments - US Army Corps of Engineers Request for Comments, Enbridge Line 5 Tunnel Project Environmental Impact Statement

Dear Lieutenant Colonial Boyle,

The American Petroleum Institute (API) appreciates this opportunity to submit comments on the US Army Corps of Engineers (USACE) request for information as you scope the Environmental Impact Statement (EIS) for the Enbridge Line 5 project to replace and relocate the segment of Line 5 crossing the Straits of Mackinac into a tunnel beneath the Straits of Mackinac.

The American Petroleum Institute represents all segments of America's natural gas and oil industry. Our approximately 600 members produce, process, and distribute most of the nation's energy. The industry also supports more than ten million U.S. jobs and is backed by a growing grassroots movement of millions of Americans. The API was formed in 1919 as a standards-setting organization. In our first 100 years, API has developed more than 700 standards to enhance operational and environmental safety, efficiency, and sustainability.

API and its member companies support the prompt approval of the EIS and all required permits and authorizations which will allow Enbridge to move forward with the Line 5 Great Lakes Tunnel Project as quickly as possible as the tunnel is the best option from an environmental and safety perspective. The proper scope of the USACE's EIS should focus on assessing tunnel alignments across the Straits, not a review of the entire pipeline. The design and engineering of the tunnel project adheres to the principle of having a minimal impact on the surrounding environment and protecting the Great Lakes. The tunnel project offers the greatest possible safeguards to Lake Michigan while continuing to deliver essential energy to the region. Line 5 meets the propane demands for more than half of the State of Michigan and 65 percent of the Upper Peninsula alone.

Safety is a core value that is paramount in every aspect of our industry's operations. Pipelines are the safest way to transport the natural gas and oil that Americans use every day, and consumers - whether hospitals, schools, emergency responders, manufacturers, or families - have an expectation that energy will be there when they need it. The Great Lakes Tunnel Project will ensure the safety and reliability of Line 5 in the Straits by housing 30-inch diameter pipeline replacement segment 100 feet below the lakebed within the subsurface easement issued by the Michigan Department of Natural Resources

(DNR) to the Mackinac Straits Corridor Authority (MSCA). There is almost no impact to wetlands and no impact to the lake bottom, that's why the tunnel was chosen by the State of Michigan.

As determined by the State, the tunnel enhances safety of the Straits, as compared to other alternatives, by providing secondary containment to virtually eliminate the potential for a release into the Straits. Other alternatives to replace Line 5's crossing of the Straits will likely result in significant environmental impacts to the Great Lakes, such as dredging associated with the installation of a pipeline on the lakebed. Additionally, non-pipeline alternatives are not an option to connect Enbridge's existing Line 5 facilities on either side of the Straits. The significant amounts of petroleum products reliably and safely transported by the dual pipelines cannot possibly be carried by trucks of the Mackinac Bridge; barge infrastructure at the Straits does not exist and would adversely impact vessel traffic transiting the Straits; rail infrastructure between Enbridge's existing Strait's facilities does not exist. Transportation alternatives like trains, trucks and ships use fuel to move fuel, is a less environmentally friendly and sustainable approach and puts Michiganders at far greater risk than a well-protected pipeline under the Straits. Additionally, non-pipeline alternatives have higher greenhouse gas emissions as compared to a pipeline and result in a higher frequency of incidents on a per mile basis.

At a time when we least can afford it, this would be another lost opportunity for Michigan if we don't leverage the chance to protect and preserve our environment by building the Great Lakes Tunnel. This is the right plan for the environment and Michigan. The Great Lakes Tunnel can help ensure extra layers of safety and environmental protection in our waterways without compromising the delivery of the energy on which Michigan depends. There is a reason more than 70 percent of Michiganders support the Great Lakes Tunnel project; it will provide additional connectivity between the Peninsulas, safeguarding important utilities while protecting the waterways millions of us treasure and still give us much-needed affordable, reliable energy.

API and the pipeline industry as a whole are committed to safely delivering its products to market without incident by employing robust and holistic safety practices. The reality is there are no viable alternatives to the Great Lakes Tunnel to house a replacement section of Enbridge Line 5, and the Tunnel will continue the safe and reliable delivery of essential energy supplies to Michigan residents and the region. We urge the USACE to ensure a timely review and decision on the approval of the tunnel project EIS as it has now been over 2 ½ years since Enbridge filed their first permit.

Thank you for your time and opportunity to comment.

Regards,



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