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To the U.S. Army Corps of Engineers,

Thank you for meeting with us on April 12th.

We write to you as concerned Indigenous grandmothers, mothers, aunties, daughters, sisters, and two-spirit relatives who seek to protect all that is sacred for future generations. We are of the Great Lakes, where food grows on water. The wild rice (*manoomin*) is our sacred food. In our traditions, we view the land and water, the plants and animals, and the birds and fish as our relatives. We hold a responsibility to protect our water, our ecosystems, and our cultural lifeways for the next seven generations.

Both the current Line 5 and the proposed Line 5 expansion threaten to irreversibly damage our drinking water, our ecosystems, and *manoomin*. Both the existing and proposed pipelines violate

our tribal usufructuary rights. They endanger the Great Lakes' waters and fisheries important to many people. They exacerbate the climate crisis that affects the whole planet.

We oppose the continued operation of the old and failing Line 5. It transports 22 million gallons of crude oil each day through northern Wisconsin, Michigan's Upper Peninsula, and under the Straits of Mackinac. It threatens catastrophic spills into the Great Lakes, which hold 95 percent of the surface freshwater in the United States.¹ Bechtel Corporation built this pipeline in 1953 and Enbridge continues to operate it nearly 20 years past its engineered lifespan.

We call on you to reject permits for the expansion of Line 5 in northern Wisconsin. This plan places massive risk squarely upon the Bad River Tribe and the Red Cliff Tribe against their will. Furthermore, we consider the pipeline construction an act of cultural genocide. Damage to the land and water destroys food and cultural lifeways that are core to our identity and survival. The pipeline would cut through more than 900 waterways upstream of the Bad River Reservation.² The U.S. EPA determined that the plan "may result in substantial and unacceptable adverse impacts" to the Kakagon and Bad River slough complex.³ This is unacceptable.

As you are aware, Enbridge submitted its Line 5 permit application pursuant to two different sections of law: Section 10 of the Rivers and Harbor Act of 1899 (for work under U.S. navigable waters) and Section 404 of the Clean Water Act (for discharges of dredged or fill material into U.S. waters).

These permits should be denied for the reasons outlined in this letter. Given President Biden's steps to restore National Environmental Policy Act (NEPA) regulations, we call for your review to consider:

- Direct, indirect, and cumulative impacts
- All connected actions, including the proposed Line 5 tunnel under the Straits of Mackinac
- Greenhouse gas emissions projections for the continued use of the entire Line 5, which this new segment would enable
- Alternative approaches – including a decommissioning alternative – that would minimize environmental and public health costs

We ask you to:

¹ "Great Lakes Fact Sheet." Great Lakes Stewardship Initiative.

https://greatlakesstewardship.org/wp-content/uploads/2017/12/GreatLakes_FactSheet-2.pdf.

² Draft Environmental Impact Statement: Proposed Enbridge Line 5 Relocation Project Vol.2, December 2021, p.151, https://widnr.widen.net/s/s6crdq29vc/el5_drafteis_dec2021_vol2-appendices.

³ Letter from US EPA Region 5 to US Army Corps of Engineers, St. Paul District, Regulatory Branch, 16 March 2022, <http://www.badriver-nsn.gov/wp-content/uploads/2022/03/Enbridge-WI-LR5-letter-3-16-22-WD-DD-E-SIGN.pdf>.

- Order a federal EIS for **all** portions of Line 5 within the Army Corps of Engineers' jurisdiction, given that only the Straits of Mackinac area is currently scheduled for review
- Review Enbridge's record of misrepresenting risks, violating permits, spilling oil, and covering up environmental damage⁴
- Hold a virtual public hearing on the requested permits
- Add a public comment period for the draft Environmental Assessment

The Kakagon and Bad River Sloughs are part of an outstanding and unique coastal ecosystem designated as an Aquatic Resource of National Importance.⁵ This vast wetland contains the Great Lakes' only remaining extensive coastal wild rice bed and represents 40 percent of Lake Superior's coastal wetlands.⁶ Diverse fish populations spawn in the Bad River Watershed. These fish are economically and culturally vital to the Bad River Band and Red Cliff Band of Lake Superior Chippewa.

The impact of pipeline construction — or worse, an oil spill — could permanently devastate the exceptional ecology of the watershed, the wild rice, and fish populations.

We don't trust Enbridge, and with good reason. Just look to the west to see Enbridge's troubling permit violations during Line 3 construction through northern Minnesota.

Enbridge proposes using horizontal directional drilling (HDD) under 14 rivers that flow into the Bad River Reservation, including the White, Marengo, and Bad rivers. In Minnesota, Enbridge's HDD practices resulted in frac-outs at 28 sites along Line 3's route.⁷ This occurs when the drilling mud is forced outside of the boring tunnel and enters groundwater, at times reaching the surface. The company polluted surface water at 63% of HDD sites, including at the Mississippi headwaters, and released an undisclosed volume of drilling fluid into aquifers.⁸

Line 3 construction workers also violated permits when they breached at least three artesian aquifers, releasing 280 million gallons of groundwater.⁹

⁴ Minnesota Environmental Partnership. "Update on the Enbridge Line 3 Aquifer Breaches and Spills." YouTube, 20 Jan. 2022, www.youtube.com/watch?v=iGdn-XFDwZg.

⁵ Letter from US EPA Region 5 to US Army Corps of Engineers, St. Paul District, Regulatory Branch, 16 March 2022, <http://www.badriver-nsn.gov/wp-content/uploads/2022/03/Enbridge-WI-LR5-letter-3-16-22-WD-DD-E-SIGN.pdf>.

⁶ "Kakagon and Bad River Sloughs," Ramsar Sites Information Service, <https://rsis Ramsar.org/ris/2001>.

⁷ "MPCA: Enbridge Polluted Water at 63% of Horizontal Drilling Locations." Watch the Line MN, 10 Aug. 2021, <http://watchthelinemn.org/2021/08/10/mpca-enbridge-polluted-water-at-63-of-horizontal-drilling-locations>.

⁸ Marohn, Kirsti. "Minn. Lawmaker Demands Data on Line 3 Frac-Outs." MPR News, MPR News, 23 Feb. 2022, www.mprnews.org/story/2022/02/23/minn-lawmaker-demands-data-on-line-3-fracouts.

⁹ Minnesota Environmental Partnership. "Update on the Enbridge Line 3 Aquifer Breaches and Spills." YouTube, 20 Jan. 2022, www.youtube.com/watch?v=iGdn-XFDwZg.

In a Clearwater County case, workers failed to follow construction plans Enbridge provided to the Minnesota Department of Natural Resources (DNR), the department said in a media release.¹⁰ Enbridge was permitted to dig an 8-10 foot deep trench near a calcareous fen. Instead, it dug a trench 18 feet deep, then drove sheet pilings to a depth of 28 feet, immediately breaking the ancient artesian aquifer.

Enbridge did not report the breach to the DNR for more than four months – violating their water appropriation permits, water discharge permits, and wetland permits.¹¹

“Enbridge’s actions are clear violations of state law and also of public trust,” DNR Commissioner Sarah Strommen said in the media release. “This never should have happened, and we are holding the company fully accountable.”

We still await more details on the other two aquifer breaches.

The number of known frac-outs and breaches could grow as tribal members and citizens continue to monitor the Line 3 corridor for telltale signs. We have no reason to expect different behavior from Enbridge in Wisconsin and Michigan.

We also are concerned that pipeline construction will increase human trafficking in our communities. The Line 3 Environmental Impact Statement identified this as a concern, but Minnesota regulators didn’t require Enbridge to report incidents.¹² During two human trafficking stings in northern Minnesota during Line 3 construction, four of the 13 people arrested, or roughly 30 percent, worked on Line 3.^{13,14}

Indigenous women face a murder rate ten times the national average, and 96 percent of victims experience violence by non-Native perpetrators.¹⁵ Legal loopholes allow these perpetrators to

¹⁰ “Minnesota Department of Natural Resources Orders Enbridge Energy to Pay \$3.32 Million for Failure to Follow Environmental Laws,” Minnesota Department of Natural Resources, <https://files.dnr.state.mn.us/features/line3/mndnr-orders-enbridge-energy-to-pay.pdf>

¹¹ Letter from geologist Laura Triplett, biologist Christy Dolph, geologist Jeffrey Broberg, and media specialist Ron Turney to Minnesota State Senator John Marty, 6 October 2021, <https://drive.google.com/file/d/1-H5Xn28bQWepYuYsCiOGYL1FV1jW58fj/view>

¹² Line 3 Project Final Environmental Impact Statement, Chapter 11: Environmental Justice, Minnesota Department of Natural Resources, <https://mn.gov/eera/web/project-file?legacyPath=/opt/documents/34079/Line3%20FEIS%20Ch%2011%20Environmental%20Justice%20Complete.pdf>

¹³ Beaumont, Hilary. “Sexual Violence along Pipeline Route Follows Indigenous Women’s Warnings.” The Guardian, The Guardian, 4 June 2021, www.theguardian.com/us-news/2021/jun/04/minnesota-pipeline-line-3-sexual-women-violence.

¹⁴ “Two more Line 3 workers arrested in sex trafficking sting,” Healing Minnesota Stories, 29 July 2021, <https://healingmnstories.wordpress.com/2021/06/29/two-more-line-3-workers-arrested-in-sex-trafficking-sting/>

¹⁵ Stern, Julia. “Pipeline of Violence: The Oil Industry and Missing and Murdered Indigenous Women.” Immigration and Human Rights Law Review, 28 May 2021, <http://lawblogs.uc.edu/ihr/r/2021/05/28/pipeline-of-violence-the-oil-industry-and-missing-and-murdered-indigenous-women/>.

escape accountability. Construction directly around the Bad River Reservation threatens women, girls, and community members who live there.

Additionally, Line 5 has damaging global impacts. The latest United Nations Intergovernmental Panel on Climate Change report says, once again, that we must cut greenhouse gas emissions as quickly as possible.¹⁶ UN Secretary-General António Guterres stated last week, “Investing in new fossil fuels infrastructure is moral and economic madness. Such investments will soon be stranded assets.”¹⁷ It doesn’t make sense to extend the life of an old and failing pipeline when we must urgently transition away from fossil fuels.

More detailed arguments follow.

1) Kakagon-Bad River Slough Complex

The Kakagon-Bad River Slough Complex is an outstanding, unique wetland ecosystem that abuts Lake Superior. This wetland covers 10,760 acres of mostly undeveloped sloughs, bogs, and coastal lagoons critical to Lake Superior’s health. Enbridge’s proposed route would cross 72 waterbodies where the federal government has jurisdiction. Trenching and drilling could introduce excess sediment, fuels, lubricants, and drilling fluids into the wetland complex through connected tributary streams, causing permanent damage to the surface and ground waters.

We uplift an excerpt from the EPA’s recent letter to you regarding Enbridge’s extreme threats to this treasured ecosystem.¹⁸

The Bad River and the Kakagon-Bad River Sloughs are [Aquatic Resources of National Importance] because they are economically significant; their unique characteristics have been identified and designated for protection under international, national, state, and tribal law; and these waterbodies are integral to maintaining and enhancing the quality of the Nation’s waters. The Kakagon-Bad River Sloughs wetland complex is designated as a Ramsar International Treaty Convention Wetland of International Importance.¹⁹

In addition to the economic and cultural value of wild rice to the Bad River Band, the sloughs provide important habitat supporting many fish species integral to Lake Superior

¹⁶ “AR6 Climate Change 2022: Mitigation of Climate Change.” IPCC, 2022, www.ipcc.ch/report/sixth-assessment-report-working-group-3/.

¹⁷ “Secretary-General Warns of Climate Emergency, Calling Intergovernmental Panel’s Report ‘a File of Shame’, While Saying Leaders ‘Are Lying’, Fuelling Flames.” United Nations, 4 April 2022, www.un.org/press/en/2022/sqsm21228.doc.htm.

¹⁸ Letter from US EPA Region 5 to US Army Corps of Engineers, St. Paul District, Regulatory Branch, 16 March 2022, <http://www.badriver-nsn.gov/wp-content/uploads/2022/03/Enbridge-WI-LR5-letter-3-16-22-WD-DD-E-SIGN.pdf>.

¹⁹ “Kakagon and Bad River Sloughs,” Ramsar Sites Information Service, <https://rsis.ramsar.org/ris/2001>.

recreational and commercial fishing.²⁰ Bad River Band noted in 2019: “Comprising a significant portion of the remaining Lake Superior coastal wetlands, the Kakagon and Bad River Sloughs is critical to supporting the biodiversity of Lake Superior fisheries.”²¹

According to the U.S. Fish and Wildlife Service, the Kakagon Slough is also a Nature Conservancy Priority Conservation area, a Wisconsin Legacy Place, a Wisconsin Bird Conservation Initiative Important Bird Area, a Wisconsin Wetlands Association Wetland GEM, and a Wisconsin Coastal Wetland Primary Inventory Site.²²

Based on the Application and the Wisconsin Environmental Policy Act (WEPA) Draft Environmental Impact Statement (DEIS) prepared by the Wisconsin Department of Natural Resources (WDNR), EPA believes that sediment laden runoff from the WI LR5 project could enter the sloughs through the connected tributary streams, and may permanently and negatively impact water quality, aquatic life, and native habitat.²³

EPA believes that the Kakagon-Bad River Sloughs and the Bad River are especially vulnerable to adverse impacts from the proposed project because several waters with a nexus to this watershed are already impaired and/or are susceptible to receiving high loads of sediment.²⁴

2) Evidence-based reasons to deny a permit under Section 10 of the Rivers and Harbor Act of 1899 for work under a navigable water of the US

Enbridge has proposed using horizontal directional drilling (HDD) under 26 rivers and streams in the Bad River Watershed, including the White River, the Bad River’s largest tributary.²⁵ The White River flows directly into the Bad River Tribe’s extensive wild rice beds and provides essential habitat for numerous species of fish and aquatic organisms.

²⁰ “Kakagon Slough.” Wisconsin Department of Natural Resources, <http://dnr.wi.gov/lakes/lakepages/LakeDetail.aspx?wbic=2891700>.

²¹ “Kakagon and Bad River Sloughs Recognized as a Wetland of International Importance – Bad River Tribe.” Bad River Band of Lake Superior Chippewa, 22 Aug. 2019, www.badriver-nsn.gov/kakagon-and-bad-river-sloughs-recognized-as-a-wetland-of-international-importance/.

²² Draft Environmental Impact Statement: Proposed Enbridge Line 5 Relocation Project Vol.1, page 99, Wisconsin DNR, December 2021, https://widnr.widen.net/s/pmjd16pbpd/el5_drafteis_dec2021_vol1-deis

²³ Draft Environmental Impact Statement: Proposed Enbridge Line 5 Relocation Project Vol.1, page 199, Wisconsin DNR, December 2021, https://widnr.widen.net/s/pmjd16pbpd/el5_drafteis_dec2021_vol1-deis

²⁴ Letter from US EPA Region 5 to US Army Corps of Engineers, St. Paul District, Regulatory Branch, 16 March 2022, <http://www.badriver-nsn.gov/wp-content/uploads/2022/03/Enbridge-WI-LR5-letter-3-16-22-WD-DD-E-SIGN.pdf>.

²⁵ Draft Environmental Impact Statement: Proposed Enbridge Line 5 Relocation Project Vol.1, Wisconsin DNR, December 2021, https://widnr.widen.net/s/pmjd16pbpd/el5_drafteis_dec2021_vol1-deis

In Minnesota, Enbridge caused frac-outs at 63% of HDD sites, polluting surface water and releasing undisclosed amounts of drilling fluid into groundwater.²⁶ The company misrepresented the likelihood of drilling failures prior to Line 3's construction, calling the risk "low".²⁷

Enbridge could significantly degrade downstream ecosystems at the White River and all proposed HDD river crossings in Wisconsin. In Minnesota, independent monitors documented elevated pH conditions downstream from HDD sites, fish with cysts, dead vegetation, and other adverse impacts. White Earth tribal member and media specialist Ron Turney photographed frac-out sites in Minnesota with aerial drones. His photos and videos show extensive drilling fluid pollution at the Mississippi River along the full length of easement corridor, welling up from groundwater months after the frac-out occurred. On February 28, 2022, he wrote:

Our water testing confirmed very high pH conditions at the frack-out sites and downriver. The turbidity was 9x higher than upriver. The degradation to life downstream at the Mississippi is very evident! The fish had cysts, then they started to disappear. The vegetation looked brown and dead downriver. I have a video of the chemical sludge floating in the wild rice beds 12 MILES downriver!!

Some of the drill mud additives have a pH of 12! Wild rice can't survive in that high of pH. The river looked dead. The way you see last year's old foliage flowing downriver in the spring, this was in late Fall. Fly upriver and the river banks looked healthy and you could visually see the lower turbidity upriver. I have video flyovers showing the clear water upriver and the polluted water downriver. Those sandbags in the picture above were nearly underwater, but the drilling mud had been running off into the wetland. The marsh is completely saturated with chemicals and drilling mud downriver. Plus I have footage of the drilling mud rising out of a natural spring 200ft downriver.²⁸

Enbridge drilling fluid contains fine-grained bentonite and water as a "base" with 17 additives, most of which should never be used near a waterway, low area, or sewer. Many have a pH of 8-12 and damaged wetlands near the frac-outs.²⁹ The highest volume additive AMC Gel, for instance, is categorized as a hazardous chemical and includes a red warning "DO NOT discharge into sewer or waterways."³⁰ Knowingly using a harmful additive near a wetland is criminal. The

²⁶ "MPCA: Enbridge Polluted Water at 63% of Horizontal Drilling Locations." Watch the Line MN, 10 August 2021, <http://watchthelinemn.org/2021/08/10/mpca-enbridge-polluted-water-at-63-of-horizontal-drilling-locations>.

²⁷ Summary of Hydrofracture Analyses and Historical Horizontal Directional Drill Data, Enbridge Energy, Limited Partnership, Line 3 Replacement Project, 2020.

²⁸ Turney, Ron. Email to Rebecca Kemble, 28 February 2022.

²⁹ Attachments Memo to letter from geologist Laura Triplett, biologist Christy Dolph, geologist Jeffrey Broberg, and media specialist Ron Turney to Minnesota State Senator John Marty, Attachment 5: Water Drilling Fluid Chemistry, 6 October 2021, <https://drive.google.com/file/d/16eZYqxYl8d39x8MRa5uL3nO5ZNekUv6S/view>.

³⁰ Attachment L Drilling Mud Additives Information, *Line 3 Replacement Project Proposed Drilling Mud Additives*, 2020. <https://www.pca.state.mn.us/sites/default/files/Attachment-L-Drilling-Mud-Additives-Information-2020.pdf>

Pennsylvania Attorney General charged Energy Transfer with 48 environmental crimes for identical actions – releasing drilling fluids and compromising the drinking water.

The EPA's recent letter to the U.S. Army Corps describes how Enbridge's Line 5 proposal could permanently damage water quality, aquatic life, and native habitat:

Consistent with the provisions of the 1992 CWA Section 404(q) Memorandum of Agreement between the EPA and Department of the Army, Part IV paragraph 3(a), and based on the Application and related information that EPA reviewed, we believe that the proposed project “may result in substantial and unacceptable adverse impacts” to the Bad River and the Kakagon-Bad River Sloughs wetland complex, which EPA has identified as aquatic resources of national importance (ARNIs) and that are located within both the Bad-Montreal (HUC 04010302) and Beartrap-Nemadji (HUC 04010301) watersheds.³¹

At present, EPA does not believe there is sufficient information to enable a conclusion that the proposed project is the least environmentally damaging practicable alternative (LEDPA), that the project would not result in violation of water quality standards or significant degradation of aquatic resources, or that the project would appropriately mitigate for unavoidable impacts to waters of the United States (WOTUS). EPA's comments address avoidance and minimization of pipeline installation related discharges to WOTUS; recommendations to address water quality and significant degradation concerns; and options for improving mitigation for any unavoidable impacts.³²

While the EPA letter may inadvertently suggest that HDD may be less disruptive, Enbridge failed to use this method safely in Minnesota. The company's record indicates that they will poison trout streams and aquifers at HDD sites.³³

The use of HDD at the White River, the largest tributary to the Bad River, has the potential to devastate the downstream ecological system.

3) Ongoing investigations of the 2021 Line 3 expansion by Tribal members³⁴, the MN DNR and PCA, scientists, citizens and politicians have revealed irrefutable patterns of Enbridge misrepresenting risks, violating permits, and covering up

³¹ “CWA Section 404(Q): Memorandum of Agreement between EPA and Department of the Army.” US EPA, 9 March 2015, www.epa.gov/cwa-404/cwa-section-404q-memorandum-agreement-between-epa-and-department-army-text#2.

³² Letter from US EPA Region 5 to US Army Corps of Engineers, St. Paul District, Regulatory Branch, 16 March 2022, <http://www.badriver-nsn.gov/wp-content/uploads/2022/03/Enbridge-WI-LR5-letter-3-16-22-WD-DD-E-SIGN.pdf>.

³³ “Understanding the Line 3 Aquifer Breach and Spills,” Minnesota Environmental Partnership, 29 September 2021, www.mepartnership.org/line3/aquifer-breach.

³⁴ Research and Monitoring by Ron Turney (White Earth Ojibwe), 2022, https://drive.google.com/file/d/14e9t84n8-X-r1f1H_u5Yc-l-dFK_Zka3/view?usp=sharing

environmental damage, with a singular goal of installing pipe and running tar sands as quickly as possible, regardless of irreversible damages and harms³⁵

In October 2021, concerned members of the public published the “Compiled Catalog of Line 3 Failures and Violations,” together with scientists & technical experts. The catalog lists problems under the categories of:

- failure by state and federal agencies to abide by treaty law;
- failure by state agencies to engage in meaningful Tribal consultation as promised by an executive order;
- inspection and reporting failures by Enbridge, “independent” environmental monitors (selected and trained by Enbridge) and agencies;³⁶
- failure by state agencies to consider or abide by the state of the science regarding water resource protection;
- false statements and obfuscation by state agencies.³⁷

In the 2020 submission of their 401 permit applications for Line 3, Enbridge engineers assessed the risk of “inadvertent mud loss” to be “low,” and never disclosed how much they expected to lose. For all but one river crossing, engineers wrote, “The risk of inadvertent returns due to hydrofracture is low over the majority of the crossing length.”³⁸

In 2022, once Enbridge completed Line 3 construction and started operations, the company reversed its public narrative about the risk of frac-outs.^{39,40} In response to an inquiry from Minnesota State Senator John Marty, Enbridge wrote, “The inadvertent release of drilling fluid during HDD crossings is a generally known and common risk associated with the HDD crossing method.”⁴¹

³⁵ Minnesota Environmental Partnership. “Update on the Enbridge Line 3 Aquifer Breaches and Spills.” YouTube, 20 Jan. 2022, www.youtube.com/watch?v=iGdn-XFDwZg.

³⁶ Letter from geologist Laura Triplett, biologist Christy Dolph, geologist Jeffrey Broberg, and media specialist Ron Turney to Minnesota State Senator John Marty, 6 October 2021, <https://drive.google.com/file/d/1-H5Xn28bQWepYuYsCiOGYL1FV1jW58fj/view>; as per Ron Turney, “We found out during our meetings with the MN DNR and MN Pollution Control Agency that 17 of the 41 environmental monitors previously worked with Enbridge.”

³⁷ Letter from geologist Laura Triplett, biologist Christy Dolph, geologist Jeffrey Broberg, and media specialist Ron Turney to Minnesota State Senator John Marty, 6 October 2021, <https://drive.google.com/file/d/1-H5Xn28bQWepYuYsCiOGYL1FV1jW58fj/view>.

³⁸ “Summary of Hydrofracture Analyses and Historical Horizontal Directional Drill Data.” Enbridge Energy, Limited Partnership, Line 3 Replacement Project, 2020.

³⁹ “Understanding the Line 3 Aquifer Breach and Spills.” Minnesota Environmental Partnership, 29 Sept. 2021, www.mepartnership.org/line3/aquifer-breach.

⁴⁰ “MPCA: Enbridge Polluted Water at 63% of Horizontal Drilling Locations.” Watch the Line MN, 10 Aug. 2021, <http://watchthelinemn.org/2021/08/10/mpca-enbridge-polluted-water-at-63-of-horizontal-drilling-locations>.

⁴¹ Enbridge Energy. Letter to Senator John Marty. 14 January 2022. https://drive.google.com/file/d/1hCeozdg4_9UUFYalr3fFlzMZWp28gRL0/view

Minnesota geologist Jeffrey Broberg determined that Line 3 engineers minimized the overall risk rating by averaging the risks over all bids found in the borings.⁴² This flawed risk assessment shaped permit decisions. It led to surface-only plans for frac-outs.

Enbridge caused at least 28 frac-outs in Minnesota, releasing drilling fluid into waterways and groundwater. Aerial photos at the Mississippi River show extensive upwelling of drilling chemicals from groundwater, months after the frac-outs occurred.⁴³

Why are chemicals coming up from the ground? Minnesota geologists Jeffrey Broberg and Laura Triplett have studied the problem. In January, Broberg presented research from the U.S. Army Corps describing what happens during frac-outs.^{44,45} High pressure drilling causes fracturing of bedrock, and large underground cavities form. In order to stop these sinkholes from collapsing and push the pipeline through, companies fill the cavities with large volumes of drilling fluid. Broberg and Triplett believe Enbridge pumped massive volumes of toxic fluids into the ground to fill these cavities.⁴⁶

Senator Marty called on Enbridge to disclose the total amount of drilling mud used at each crossing, and Enbridge refused to share this information.⁴⁷

Groundwater impacts were not included in Enbridge's Line 3 "Site-Specific HDD Inadvertent Release Response Plans." This report does not even contain the word "groundwater."⁴⁸ It's unacceptable to allow Enbridge to pollute aquifers and ignore this risk.

In addition to multiple violations of Minnesota state law and construction permits, unreported aquifer breaches and frac-outs, Enbridge incurred serious permit infractions regulated by the

⁴² Minnesota Environmental Partnership. "Update on the Enbridge Line 3 Aquifer Breaches and Spills." YouTube, 20 Jan. 2022, www.youtube.com/watch?v=iGdn-XFDwZg.

⁴³ Turney, Ron. Letter to Jamie Pinkham. 11 October 2021, https://drive.google.com/drive/folders/10mO_Wm32Vk2uF7eXZ-rHS-Nyv2_3KqYs.

⁴⁴ Minnesota Environmental Partnership. "Update on the Enbridge Line 3 Aquifer Breaches and Spills." YouTube, 20 Jan. 2022, www.youtube.com/watch?v=iGdn-XFDwZg.

⁴⁵ Akinbowale, Sunday, et al. "SWG's History/Case Studies Of Frac-Out And Other Horizontal Directional Drilling (HDD) Installation Issues." U.S. Army Corps of Engineers. <https://www.swg.usace.army.mil/Portals/26/THOMAS-SWG%20HDD%20-%20Winter%20Stakeholder%20Partnership%20Forum%202020.pdf>

⁴⁶ Letter from geologist Laura Triplett, biologist Christy Dolph, geologist Jeffrey Broberg, and media specialist Ron Turney to Minnesota State Senator John Marty, 6 October 2021, <https://drive.google.com/file/d/1-H5Xn28bQWepYuYsCiOgYL1FV1jW58fj/view>

⁴⁷ Marohn, Kirsti. "Minn. Lawmaker Demands Data on Line 3 Frac-Outs." MPR News, 23 Feb. 2022, www.mprnews.org/story/2022/02/23/minn-lawmaker-demands-data-on-line-3-fracouts.

⁴⁸ "Attachment M: Enbridge Site-Specific HDD Inadvertent Release Response Plans." Enbridge Energy. https://www.pca.state.mn.us/sites/default/files/Attachment%20M_SS%20HDD%20IRRP.pdf

MPCA and the US Army Corps of Engineers.^{49,50,51} This includes 17 discharges of silt and mud into streams and wetlands, in violation of Construction Site Stormwater Permits and wetlands protections.

There are more issues of concern that still lack answers, such as Enbridge's large dewatering increase.

On November 8, 2020, the Minnesota DNR approved a 510-million-gallon Dewatering Permit for Line 3 prior to construction.⁵² It allowed workers to pump groundwater away from the trench to create dry work areas. Enbridge started building the following month.

Less than three months later on January 6, 2021, Enbridge asked the DNR for a permit amendment to dewater *5 billion gallons* of groundwater, nearly a 10-fold increase.

The DNR approved the amended permit. "The request for an increased volume of water is due to the encountering of more groundwater than originally anticipated," the DNR wrote in its approval.^{53,54}

Here are the questions:

- Enbridge built Line 3 during an exceptional drought. How is it possible the company encountered more groundwater than expected during an exceptional drought?
- Enbridge is a multinational firm and undoubtedly has very good scientists. How can this significant water taking discrepancy be accounted for?
- How much of this water did Enbridge use to create drilling fluid? How much drilling fluid did Enbridge release into groundwater during frac-outs?

4) Evidence-based reasons to deny a permit under Section 404 of the Clean Water Act for discharges of dredged or fill material into waters of the US

⁴⁹ "Restoration and Replacement Order." Minnesota DNR, 19 September 2021, <https://drive.google.com/file/d/1agbJXJsYnUQdoodX9CYx0mRfVBdoB1dN/view?usp=sharing>.

⁵⁰ Turney, Ron. Letter to Jamie Pinkham. 11 October 2021, https://drive.google.com/drive/folders/10mO_Wm32Vk2uF7eXZ-rHS-Nyv2_3KqYs.

⁵¹ Letter from geologist Laura Triplett, biologist Christy Dolph, geologist Jeffrey Broberg, and media specialist Ron Turney to Minnesota State Senator John Marty, 6 October 2021, <https://drive.google.com/file/d/1-H5Xn28bQWepYuYsCiQGYL1FV1jW58fj/view>.

⁵² "Enbridge Line 3 Replacement Project Water Appropriation Permit Amendment." 4 June 2021, <https://healingmnstories.files.wordpress.com/2021/06/dnr-line-3-water-update.pdf>.

⁵³ Hughlett, Mike. "Minnesota's OK for Enbridge to Temporarily Move 5B Gallons of Water Sows Tension." Star Tribune, 29 June 2021, <http://www.startribune.com/minnesotas-ok-for-enbridge-to-temporarily-move-5b-gallons-of-water-sows-tension-line-3-pipeline/600073288>.

⁵⁴ "Enbridge Line 3 Replacement Project Water Appropriation Permit Amendment." 4 June 2021, <https://healingmnstories.files.wordpress.com/2021/06/dnr-line-3-water-update.pdf>.

Enbridge proposes temporary discharge of dredged fill material into over 100 acres of wetlands and waters. While the storage of fill material may be temporary, the resulting damage to vulnerable ecosystems could be long-lasting or permanent.

Despite the strong opposition of the Bad River Band of Lake Superior Chippewa, Enbridge proposes to route Line 5 through more than 100 rivers and streams that flow into the Bad River Reservation, their extensive fisheries, and the navigable waters of Lake Superior.⁵⁵

The Bad River Watershed is home to an outstanding, unique coastal ecosystem that powers the fisheries of Lake Superior, with the only extensive coastal wild rice bed remaining on the Great Lakes. The Kakagon and Bad River Sloughs are recognized as a wetland of international importance by the Ramsar Convention. Running an oil pipeline through all the major tributaries of this ecosystem, with the potential cumulative impacts of pipeline construction, oil spills, aquifer breaches, and HDD drilling fluid pollution, would have severe long-term consequences for the unique ecology of this watershed. We consider this an act of genocide.

Construction of the Line 5 expansion would damage numerous trout streams. A 2019 report commissioned by Trout Unlimited concluded that detrimental effects of laying pipelines “include increased sedimentation and erosion; inadvertent returns of drilling fluid at river crossings; and reduction of important aquatic life habitat through the removal of vegetation, disturbance to substrates, sedimentation, and placement of structures.”⁵⁶ This would result in fewer fish and the loss of nutrition and economic opportunities for the surrounding area.⁵⁷

5) The need to hold a virtual public hearing on the requested permits and to add a public comment period for the draft Environmental Assessment

All affected tribes and local communities deserve an opportunity to meaningfully engage throughout the Line 5 permitting process. Thus, President Biden’s environmental justice goals must also be given full consideration.⁵⁸ Building new fossil fuel infrastructure without Tribal

⁵⁵ Draft Environmental Impact Statement: Proposed Enbridge Line 5 Relocation Project Vol.2, December 2021, p.151, https://widnr.widen.net/s/s6crdq29vc/el5_drafteis_dec2021_vol2-appendices.

⁵⁶ Betcher, Megan, et al. “Pipeline Impacts to Water Quality: Documented impacts and recommendations for improvements.” 21 August 2019, <https://www.tu.org/wp-content/uploads/2019/10/Pipeline-Water-Quality-Impacts-FINAL-8-21-2019.pdf>

⁵⁷ Designated Trout Streams Along the Proposed Enbridge Line 5 Reroute.” Bad River Band of Lake Superior Chippewa, 2020, http://www.badriver-nsn.gov/wp-content/uploads/2020/12/Reroute_TroutStreams_85x11_port_Dagwaagin2020.pdf

⁵⁸ “Fact Sheet: A Year Advancing Environmental Justice.” The White House, 26 Jan. 2022, www.whitehouse.gov/briefing-room/statements-releases/2022/01/26/fact-sheet-a-year-advancing-environmental-justice.

Free, Prior, and Informed Consent directly works against President Biden's environmental justice goals and Tribal consultation commitments.

6) The need for Army Corps, within its jurisdiction, to conduct a federal EIS on the entirety of Line 5, given that currently only the Straits of Mackinac area is scheduled for review

While Enbridge is being forced to plan new segments of this 69-year-old pipeline, the entire line should be decommissioned. If a Line 5 reroute must be considered, the state DNR's draft EIS must be rejected as profoundly insufficient, and a comprehensive federal EIS must be conducted.

We believe significant environmental impacts to groundwater, surface water, and water-dependent ecosystems, as well as the cultural importance of water resources, will be overlooked and the region could suffer dire consequences if Enbridge is allowed to expand Line 5 without a federal EIS. We witnessed this harm with Enbridge Line 3, where no federal EIS was conducted.

We uplift the Great Lakes Indian Fish and Wildlife Commission (GLIFWC) letter detailing major inadequacies of the WI-DNR's Line 5 dEIS.^{59,60} GLIFWC member tribes are:

- in Wisconsin –
 - Bad River Band of the Lake Superior Tribe of Chippewa Indians,
 - Lac du Flambeau Band of Lake Superior Chippewa Indians,
 - Lac Courte Oreilles Band of Lake Superior Chippewa Indians,
 - St. Croix Chippewa Indians of Wisconsin,
 - Sokaogon Chippewa Community of the Mole Lake Band, and
 - Red Cliff Band of Lake Superior Chippewa Indians
- in Minnesota –
 - Fond du Lac Chippewa Tribe, and
 - Mille Lacs Band of Chippewa Indians
- in Michigan –
 - Bay Mills Indian Community,
 - Keweenaw Bay Indian Community, and
 - Lac Vieux Desert Band of Lake Superior Chippewa Indians.

John Coleman, environmental section leader for GLIFWC, said Line 5's draft EIS does not properly take tribal rights into account. "There's some tribes, Wisconsin tribes, that are

⁵⁹ Great Lakes Indian Fish and Wildlife Commission. Letter to the Wisconsin Department of Natural Resources. 10 December 2021, https://pdfhost.io/v/Jbm8RwA04_glifwc_line5_deis_adequacy_comments_fnl.

⁶⁰ Draft Environmental Impact Statement: Proposed Enbridge Line 5 Relocation Project Vol.1, Wisconsin DNR, December 2021, https://widnr.widen.net/s/pmjd16pbpd/el5_drafteis_dec2021_vol1-deis.

represented in the document, other tribes aren't," Coleman noted. "There's no rationale presented for why some tribes are included and others aren't."

Line 5 was built in 1953 with an engineered lifespan of 50 years.⁶¹ Given that no comprehensive tribal consultation was done and no EIS was prepared in 1953 or since, we urge the Army Corps of Engineers to properly review Line 5 in its entirety. In his June 2021 announcement of a federal EIS for Enbridge's proposed Line 5 oil tunnel under the Straits of Mackinac in Michigan, then-acting Assistant Secretary of the Army for Civil Works Jaime A. Pinkham said,

I have concluded that an EIS is the most appropriate level of review because of the potential for impacts significantly affecting the quality of the human environment. USACE will ensure all potential impacts and reasonable alternatives associated with this project are thoroughly analyzed and will ultimately support a decision on the permit application.⁶²

The Detroit District's forthcoming Notice of Intent will invite public comment on impacts and alternatives the EIS should evaluate in depth. The EIS public process promises to ensure meaningful and robust consultation with Tribal Nations per President Biden's Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships dated January 26, 2021.⁶³ Enbridge's proposal to move and expand the Wisconsin portion of Line 5 deserves the same level of care and evaluation, as does the entirety of Line 5 prior to additional investments of money, time, and risk.

Michigan Governor Gretchen Whitmer revoked the pipeline's 1953 easement under the Straits of Mackinac in November 2020, due to the imminent risk of catastrophic spills into the Great Lakes. Governor Whitmer ordered Enbridge to shut down Line 5 by May 12, 2021. Enbridge refused to comply.^{64,65} To proceed with its proposed \$500 million tunnel and pipeline reroute beneath the Straits of Mackinac, Enbridge would need permit approvals from both the MI-PSC and the Army Corps.

⁶¹ "Line 5: A History." Clean Water Action, 5 Sept. 2019, www.cleanwateraction.org/features/line-5-history.

⁶² "Acting Army Assistant Secretary Announces USACE Will Conduct an EIS for Enbridge Line 5." U.S. Army, 23 June 2021, www.army.mil/article/247787.

⁶³ "Corps of Engineers Selects Enbridge Line 5 Tunnel Project EIS Contractor." U.S. Army Corps of Engineers Detroit District, 14 Mar. 2022, www.lre.usace.army.mil/Media/News-Releases/Article/2965362/corps-of-engineers-selects-enbridge-line-5-tunnel-project-eis-contractor.

⁶⁴ Flesher, John. "Enbridge Rejects Michigan's Demand to Shut down Oil Pipeline." The Associated Press, 13 Jan. 2021, <http://globalnews.ca/news/7572086/enbridge-michigan-whitmer-line-five-pipeline>.

⁶⁵ "Oil Giant Enbridge Defies Line 5 Pipeline Shutdown Order, Faces Profit Seizures." EarthJustice, 17 Aug. 2021, <http://earthjustice.org/brief/2021/oil-giant-enbridge-defies-line-5-pipeline-shutdown-order-faces-profit-seizures>.

Recent studies have shown there is no public need for Line 5.⁶⁶ At least three reports have confirmed decommissioning this pipeline would not result in major price increases or oil and gas shortages. For example, Line 5 is demonstrably not needed to meet Upper Peninsula propane needs; there are over 50 alternative sources and adequate transport alternatives.^{67,68,69}

Notably, in May 2021 negotiations with the Federal Energy Regulatory Commission, Enbridge proposed an accelerated depreciation schedule for its Lakehead System, which includes Line 5.⁷⁰ Enbridge estimated the system had an economic life of 19 more years, a downgrade from its 2016 estimate in which it projected a lifetime of at least 30 years.⁷¹

Enbridge Energy is requesting approval for the Lakehead system's proposed depreciation rates based on a truncation date of December 31, 2040. Enbridge Energy is specifically requesting approval to use revised depreciation rates as of January 1, 2021 for ratemaking as well as FERC reporting purposes.⁷²

Residents across Wisconsin, Michigan, and Minnesota are calling attention to the imminent risk of catastrophic spills from Line 5 into the Great Lakes. A serious rupture into Lake Michigan, Lake Huron, or Lake Superior would cause economic and environmental devastation.⁷³ The Great Lakes represent the world's largest surface freshwater ecosystem, holding 84% of North America's surface fresh water and 21% of the world's surface fresh water. These lakes supply drinking water for 48 million people.⁷⁴

⁶⁶ "Fact Check: When Line 5 Shuts Down, Detroit Jets Will Still Fly and Union Refinery Jobs Will Still Exist." FLOW, 17 Nov. 2020, <http://forloveofwater.org/fact-check-when-line-5-shuts-down-detroit-jets-will-still-fly-and-union-refinery-jobs-will-still-exist-2>.

⁶⁷ "Analysis of Propane Supply Alternatives for Michigan." Public Sector Consultants, March 2020, https://www.michigan.gov/documents/egle/egle-psc-upetf-Report_Analysis_of_Propane_Supply_Alternatives_for_Michigan_683751_7.pdf.

⁶⁸ "Upper Peninsula Energy Task Force Committee Recommendations, Part I - Propane Supply." Michigan Department of Environment, Great Lakes, and Energy, 17 April 2020, https://www.michigan.gov/documents/egle/Upper_Peninsula_Energy_Task_Force_Committee_Recommendations_Part_1_Propane_Supply_with_Appendices_687642_7.pdf

⁶⁹ "Upper Peninsula Energy Task Force Committee Recommendations, Part II - Energy Supply." Michigan Department of Environment, Great Lakes, and Energy, 31 March 2021, https://www.michigan.gov/documents/egle/Report-UPETF-Phase-II_720856_7.pdf

⁷⁰ Hughlett, Mike. "Enbridge Says Aggressive Climate Policies Shortening Life of Its Pipelines." Star Tribune, Star Tribune, 5 Dec. 2021, www.startribune.com/enbridge-says-aggressive-climate-policies-shortening-life-of-its-pipelines/600124059/.

⁷¹ "2016 Depreciation Study: Lakehead system." Federal Energy Regulatory Commission, <https://drive.google.com/file/d/14FoBqr5e21jRsZihUb5ppqFJQVQfnPSn/view>.

⁷² "2021 Depreciation Study: Lakehead system." Federal Energy Regulatory Commission, <https://drive.google.com/file/d/1NWuasmkmJ9m2-tkXLNznog0iwB4IYE0y/view>

⁷³ "Oil Spill Economics: Estimates of the Economic Damages of an Oil Spill in the Straits of Mackinac in Michigan." Michigan State University, May 2018, <http://ippsr.msu.edu/research/oil-spill-economics-estimates-economic-damages-oil-spill-straits-mackinac-michigan>.

⁷⁴ "Facts and Figures about the Great Lakes | US EPA." US EPA, 18 Sept. 2015, www.epa.gov/greatlakes/facts-and-figures-about-great-lakes.

Enbridge caused the largest inland oil spill in US history. Its pipelines have ruptured more than 800 times in the past 15 years.⁷⁵ In 2018, the company spilled oil every 20 days on average.^{76,77} According to a 2016 WI-DNR report, there were 85 reported leaks of crude oil from Enbridge pipelines during the previous decade in Wisconsin alone.⁷⁸

It is vital that you fully consider the climate crisis in your decisions. To meet President Biden's goal of cutting CO₂ emissions in half by 2030, we must rapidly reduce fossil fuel use. The International Energy Agency calls for "no investment in new fossil fuel supply projects."⁷⁹ Permitting an old and failing Line 5 would only deepen fossil fuel dependence. We need to drastically reduce fossil combustion and invest in safe clean energy.⁸⁰

In conclusion

We urge you to deny Enbridge's permit applications pertaining to Line 5. We call on you to conduct a federal EIS for the entire pipeline within the Army Corps of Engineers' jurisdiction.

Sincerely yours,

Aurora Conley | Bad River Ojibwe, Anishinaabe Environmental Protection Alliance; 1854 Treaty

Jannan J. Cornstalk | Citizen of Little Traverse Bay Bands of Odawa Indians; Director of the Water is Life Festival; 1794 and 1855 Treaty

Carrie Chesnik | Oneida Nation, Wisconsin, Executive Assistant at R.I.S.E. Coalition; 1838 Treaty

Gwen Topping | Red Cliff ricer, Wisconsin Department of Justice MMIW Task Force Member; 1854 Treaty

Jaime Arsenault | Tribal Historic Preservation Officer, White Earth Band of the Minnesota Chippewa Tribe

Carolyn Goug'e | Red Cliff Band of Lake Superior Chippewa; 1854 Treaty

⁷⁵ "Importing Disaster: The Anatomy of Enbridge's Once and Future Oil Spills." National Wildlife Federation, 2012, https://www.nwf.org/~media/PDFs/Global-Warming/Reports/NWF_EnbridgeOilSpill_WEB_Final.ashx.

⁷⁶ "Dangerous Pipelines." Greenpeace USA, 14 November 2018, www.greenpeace.org/usa/reports/dangerous-pipelines.

⁷⁷ "Line 5 pipeline system, owned by Enbridge Energy." Interactive map. National Wildlife Federation. <https://www.arcgis.com/apps/View/index.html?appid=f817f5abad9a4cb09e942c1941fd0060>.

⁷⁸ "Final Environmental Impact Statement Enbridge Sandpiper Pipeline and Line 3 Replacement Projects." Wisconsin DNR. August 2016, <https://dnr.wi.gov/files/PDF/pubs/ea/EA0229.pdf>.

⁷⁹ "Pathway to Critical and Formidable Goal of Net-Zero Emissions by 2050 Is Narrow but Brings Huge Benefits, according to IEA Special Report." International Energy Agency, 18 May 2021, www.iea.org/news/pathway-to-critical-and-formidable-goal-of-net-zero-emissions-by-2050-is-narrow-but-brings-huge-benefits.

⁸⁰ "Climate Change 2022: Mitigation of Climate Change." IPCC, 2022, www.ipcc.ch/report/ar6/wg3.

Rene Ann Goodrich | Bad River Tribal Elder, Native Lives Matter Coalition, MMIW Department of Justice Task Force Member, Wisconsin, MMIW G2S Great Lakes; 1854 Treaty

Gaagigeyaashiik - Dawn Goodwin | Gaawaabaabiganigaag/White Earth-Ojibwe, Co-founder of R.I.S.E. Coalition, Representative of Indigenous Environmental Network; 1855 Treaty

Nookomis Debra Topping | Nagajiwanaang (Fond du Lac), Co-founder of R.I.S.E. Coalition; 1854 Treaty

Endorsing Organizations:

A Community Voice

Action Center on Race and the Economy

Action Collaborative for the Transforming Spirit Now (ACTS Now)

Action for the Climate Emergency (ACE)

AFGE Local 704

Alaska Community Action on Toxics

Alliance of Nurses for Healthy Environments

Amazon Watch

Animals Are Sentient Beings Inc

artistes pour la paix

Association of Young Americans (AYA)

Atmos Financial, PBC

BC Studios

Between the Waters

Beyond Extreme Energy

Beyond Nuclear

Bold Alliance

Build back fossil fuels

Cape Downwinders

Center for Biological Diversity

Change Begins With ME (Indivisible)

Change the Chamber*Lobby for Climate

Chapel Hill Organization for Clean Energy

citizens awareness network

Citizens' Resistance at Fermi Two (CRAFT)

Clean Air Coalition of WNY

Clean Energy Action

Clean Wisconsin

Climate Action Rhode Island-350

Climate Equity Policy Center

Climate Finance Action

Climate Hawks Vote

Coalition Against Death Alley

Coalition for a Nuclear Free Great Lakes
 Coalition to Protect New York
 Coastside Jewish Community
 CODEPINK San Francisco Bay Area
 Commission on Justice for Immigrants, Refugees, Indigenous people, Immaculate Heart Community
 Common Defense
 Concerned Citizens for Nuclear Safety (CCNS)
 Concerned Citizens of St. John
 Concerned Health Professionals of Pennsylvania

Dallas Peace and Justice Center
 DC Antifascist Coalition
 Divest Ed
 DNC Environment and Climate Crisis Council
 Dogwood Alliance
 Don't Waste Arizona
 Don't Waste Michigan
 Don't Waste Michigan's Sherwood Chapter
 Down East Coal Ash Environmental and Social Justice Coalition

Earth Action, Inc.
 Earth Ethics, Inc.
 Earth Guardians
 Earth Quaker Action Team
 Endangered Species Coalition
 Environmental Commission of the Immaculate Heart Community
 Extinction Rebellion San Francisco Bay Area

FCNL
 FracTracker Alliance
 Fridays for Future U.S.
 Friends of the Earth US
 Future Coalition and Youth Climate Finance Alliance

Ga. WAND & Women Changing The World
 Giniw Collective
 Grassroots Environmental Education
 Great Old Broads for Wilderness
 Great Plains Action Society
 Greater N.O. Climate Reality Project
 Greater New Orleans Interfaith Climate Coalition
 GreenFaith

Hindus for Human Rights
 Hip Hop Caucus

Honor the Earth
Humboldt Unitarian Universalist Fellowship Climate Action Campaign

Idle No More SF Bay
Immaculate Heart Community, Commission on Justice for Immigrants, Refugees, and
Indigenous People
Inclusive LA
Indian Point Safe Energy Coalition
Indigenous Environmental Network
Indigenous Peoples of the Coastal Bend
INOCHI / Women for Safe Energy
Institute for Policy Studies Climate Policy Program
Interfaith Power & Light
International Student Environmental Coalition

Kentucky Interfaith Power and Light

Lakota People's Law Project
Little Big Bay LLC
Long Beach Alliance for Clean Energy
Long Island Progressive Coalition
Louisiana League of Conscious Voters

Madison area DSA
MADRE
Maine Unitarian Universalist State Advocacy Network
McArthur Consulting
Michigan Clinicians for Climate Action (MiCCA)
Michigan Environmental Justice Coalition
Michigan Interfaith Power & Light
Mid-Missouri Peaceworks
Mid-Ohio Valley Climate Action
Migiziwillfly
Milwaukee Riverkeeper
Minnesota DFL Environmental Caucus
Movement Rights
Movement Training Network
MoveOn.org Hoboken RESIST

National Nuclear Workers for Justice (NNWJ)
Native Community Action Council
NEW ENGLAND COALITION ON NUCLEAR POLLUTION INC
New Mexico & El Paso Region Interfaith Power and Light
New Mexico Environmental Law Center
New York Unitarian Universalist Justice (NYUJ)
Nicaragua Center for Community Action

NMEAC

North American Climate, Conservation and Environment(NACCE)

North Carolina Alliance to Protect Our People and the Places We Live (NC-APPPL)

Nuclear Energy Information Service (NEIS)

Nuclear Information and Resource Service ("for a nuclear-free, carbon-free world")

Nukewatch

Occupy Bergen County (New Jersey)

Ocean Conservation Research

Oceanic Preservation Society

Ohio Nuclear Free Network

Oil Change International

On Behalf Of Planet Earth

Orange Residents Against Pilgrim Pipelines

Our Part Foundation

Our Revolution Michigan

Pax Christi USA

People Over Pipelines

Peoples Climate Movement - NY

PHASE (Promoting Health and Sustainable Energy)

Physicians for Social Responsibility

Physicians for Social Responsibility Pennsylvania

PJALS

Plastic Pollution Coalition

PortsmouthPiketon Residents for Environmental Safety and Security (PRESS)

Power Shift Network

Premier Tech Solutions

Presente.org

Progressive Democrats of America

Protect All Children's Environment

PSR Arizona

Putnam Progressives

Quaker Earthcare Witness

Rainforest Action Network

Resist the Pipeline

River Valley Organizing

Rogue Climate

Safe Energy Rights Group (SEnRG)

San Francisco Bay Physicians for Social Responsibility

San Luis Obispo Mothers for Peace

San Luis Valley Ecosystem Council

Saphron Initiative

Science for the People - Twin Cities
 Seeding Sovereignty
 Seven Circles Foundation
 Seventh Generation
 Shenanigan Bay
 Sierra Club
 Sisters Health & Wellness Collective
 Sisters of St. Dominic of Blauvelt, New York
 Solar Wind Works
 Southwest Native Cultures
 South Church UU Social Justice Associates
 Stand.earth
 Sustainable Obtainable Solutions

Terra Advocati
 The College Climate Coalition
 The Last Plastic Straw
 The Outrage
 The People's Justice Council
 The Shame Free Zone
 The United People Project
 The Wei LLC
 The YEARS Project
 Third Act
 Third Act Virginia
 Turtle Island Restoration Network

Unitarian Universalist Service Committee
 Unite North MetroDenver

Vermont Yankee Decommissioning Alliance
 Vote Climate

Waterspirit
 Waterway Advocates
 WESPAC Foundation, Inc.
 West Michigan Environmental Action Council
 WILPF-Triangle
 Wisconsin Citizens Media Coop
 Wisconsin Health Professionals for Climate Action
 Wisconsin Resources Protection Council
 Women's Earth and Climate Action Network
 Women's Environment and Development Organization (WEDO)
 Women's International League for Peace and Freedom
 Women's International League for Peace and Freedom, Earth Democracy Committee
 Women's March Ann Arbor

Zero Hour

1000 Grandmothers for Future Generations

198 methods

80 Feet Is Enough!

350 Bay Area Action

350 Central Mass

350 Colorado

350 CT

350 Hawaii

350 Humboldt

350 New Orleans

350 Silicon Valley

350 Triangle

350 Wisconsin

350NYC

350PDX