

February 2, 2022

Hello. Thank you for this opportunity to comment on the draft EIS on Enbridge's Line 5 expansion around the Bad River Reservation. My name is Sue Niemi, President of the League of Women Voters of Ashland and Bayfield Counties.

We are deeply disappointed in the DNR for releasing a flawed product. The document should be substantially re-written to include detailed analyses of risks to ecosystems, infrastructure, and financial burdens to local communities. Inaccuracies and contradictions must be reconciled. Climate impacts were ignored. Analysis of alternatives is far from complete, and the alternative of decommissioning Line 5 is absent entirely.

- Perhaps most important is the lack of analysis of the impacts and risks. For example:
  - Much of Section 6 is a description of resources rather than an analysis of the potential risk to those resources. It is full of unsupported statements of minimal or temporary effects. Language such "... impacts would be expected ...but have not been quantified."— are blatant admissions of the lack of field surveys and risk analysis.
  - The document contains little analysis of cumulative impacts. For example, the downstream effects on water quality due to 186 waterway crossings.
  - The section on ecojustice does not consider non-indigenous populations.
  - Analysis of risks for site-specific waterway and wetland crossings is absent. Geotechnical survey results should be presented as part of these analyses.
  - Detailed analysis of the impacts of a potential spill is lacking.
  - The risk in floodplains during a heavy rain event is only considered relative to the risk to the project and "unsecured machinery", not risks to the ecosystem.
  - The proposed plan and analysis regarding abandonment of the existing route through the Bad River Reservation are not explored.
  - The impacts on greenhouse gasses and climate change are not analyzed relative to extending the life of the pipeline.
- The document contains many inaccuracies and does not make use of the latest information available. For example,
  - The latest projections for the demand for oil and electricity are not reflected, nor is Enbridge's own analysis of the profitable lifespan of their pipelines.
  - Under Agricultural Lands a program is discussed that is not in use in our counties.
  - The list of private wells at risk is incomplete.
  - Treaty rights and affected Tribes are not described accurately. We back the Tribes and GLIFWC in their comments on these aspects.

Because this draft lacks information in many crucial areas, the **public has not had an adequate opportunity to review the potential risks and impacts** associated with the expansion of Line 5.

In summary, this document is a rough draft of what a draft EIS should be. **We suggest that the next release be considered the draft EIS, with further public comment invited before the EIS is finalized.**