



12.22.2017

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Dear Governor Snyder, Attorney General Schuette, Director Grether, Director Creagh, and Director Brader:

The Great Lakes Business Network (GLBN) formed around the common goal of protecting the Great Lakes and the blue economy that depends on the health of our freshwater. It is our position that Line 5 poses too great of a risk to the Great Lakes, the public, our businesses and Michigan's tourism economy – this pipeline needs to be decommissioned in a strategic manner that minimizes potential economic disruptions. Our growing Network, now with over 70 members, urges the State of Michigan (the State) to focus attention on building solutions that remove this risk from the Great Lakes and our livelihoods.

The GLBN has reviewed both the Draft and Final Alternatives Analysis and are disappointed that many of the critical recommendations set forth by the public, including this Network, were disregarded. The most critical change required Dynamic Risk to shift focus to better represent the needs of Michigan citizens over meeting the business interest of just one business - Enbridge. By not fully analyzing Michigan's needs in each alternative, showing proof of necessity, the entire report misses the mark and viable alternatives are removed from analysis entirely.

There are good business-friendly solutions towards meeting our state-wide fuel needs, but Dynamic Risk considered it out-of-scope to provide a detailed analysis that fits the interests of Michigan alone. For example, they dismissed connecting the Rapid River processing facility with nearby rail systems that would provide alternative transportation for propane, a mode of transportation used by all other suppliers in Northern Michigan. They also dismissed region-wide oil pipeline expansion projects that are ongoing, including Line 78 (formally Line 6B) that doubled in throughput and feeds regional refineries with a surplus of oil. Lastly, the report

acknowledges that transportation of Michigan oil via Line 5 has been in a steady decline for a decade and any product that doesn't enter Line 5 is shipped by rail or truck currently.

The State needs to refocus efforts towards redirecting our minimal reliance on Line 5 to alternative sources of product and alternative modes of transportation that don't allow oil to be shipped through our freshwater resources. Decommissioning the pipeline without replacement in the Straits is the only way to assure that the Great Lakes do not suffer an oil spill. The findings within the alternatives analysis show that we can decommission Line 5 pipeline with fairly minimal economic disruption, and we believe this finding overestimates costs due to overly conservative assumptions about market adjustments.

A spill in the Great Lakes would be especially detrimental to Michigan's tourism economy and the Pure Michigan brand. This risk of Enbridge's shortcut through the Great Lakes is inappropriately allocated on Michigan businesses and citizens. The alternatives analysis fails to account for the income foregone for Michigan businesses in the event of an oil spill. This substantial risk for our businesses should be considered in decisions moving forward.

With the absence of a true proof of necessity for Line 5, and the State's efforts to fully analyze risk just getting underway, it is unjustified for the State to enter any agreements with Enbridge that favors further analysis of tunneling or trenching yet discounts the best possibilities for Michigan's businesses.

The Agreement, along with statements from the State since its disclosure, indicate that the outlined measures aim to improve safety yet the parameters outlined within some of the most important measures fall short:

- The State entrusts Enbridge to provide credible and unbiased analysis for a replacement pipeline through the Great Lakes yet completely ignored the overwhelming need for proof of necessity for Michigan. Without first establishing proof of necessity for Michigan, any discussion of replacement is unwarranted.
- The State defines 'adverse weather' based on Enbridge's claimed ability to respond to an oil spill yet they failed to include critical assessments and input from responding agencies and governmental bodies, such as the U.S. Coast Guard and regional tribes, who have said they are not prepared to clean up an oil spill.
- The State encourages the replacement of Line 5 through the St. Clair River, signaling support for long-term use of the pipeline without fully understanding how a replacement of this international border crossing will greatly limit critical permitting into the future. Without fully understanding the future of Line 5, it is irresponsible to replace important sections of pipeline.
- The State also failed to acknowledge current easement violations, including the failure of the protective coating along the pipeline and Enbridge's inability to both inspect and correct those failures during winter conditions. Enbridge has admitted to not fully understanding the cause of these failures but has acknowledged that their installation of safety supports is compromising the protective coating, which calls into question their ability to maintain this pipeline, in the most basic of ways, moving forward.

In response to the State entering an agreement that lacked transparency and critical stakeholder involvement, the Michigan Pipeline Safety Advisory Board introduced three resolutions that address many of the above missing criteria. These resolutions strengthen protections for the Great Lakes, address many of the public's concerns and refocus the State to ensure that the interest of Michiganders are at the forefront. The GLBN fully supports all three resolutions and encourages swift response and action from the Governor and state agencies.

The signed Great Lakes Business Network members thank you for taking the time to read our position – we look forward to working with the State to protect the Great Lakes.

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