



THE DANGERS AND WRONGS OF LINE 5:

Environmental Risks, Economic Risks, and Indigenous Rights Violations All Point to the Need to Stop Enbridge's Pipeline and Pivot Toward a Sustainable Future

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on behalf of the Anishinaabek Caucus



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I. THE ISSUE



Figure 1. Map Depicting Enbridge Line 5 Pipeline's Route. Photo from CBC News

Enbridge's Line 5 oil pipelines, both the existing line that is twenty years past its planned lifespan and the replacement line that has been proposed, are active risks to the health and human rights of the citizens of Michigan.¹ The pipelines are in direct violation of treaty responsibilities that both the State of Michigan and the federal government have to Anishinaabe people. Neither line is necessary infrastructure², and in fact, both delay the desperately needed transition to renewable sources of energy in Michigan. More specifically, researchers at Concordia University developed a clock that estimates the time remaining until climate change is irreversible.³ The clock estimates that there are less than seven years remaining until this deadline.⁴ This shows that delays such as Enbridge's Line 5 pipelines cannot happen.⁴ Furthermore, the pipelines do not foster any tangible benefits or positive tradeoffs for the people of Michigan. Over the next few decades, there is a significant and growing chance of a major pipeline failure that would have catastrophic consequences.

It is crucial that the real story of Line 5 is known. People must be warned of the dangers and exposed to the deceptions at the heart of the case for more dangerous infrastructure. A fossil fuel dependent future must be avoided. Instead, one can work towards a future that honors health, human rights, treaty responsibilities, and environmental justice.

II. CORRECTING THE RECORD

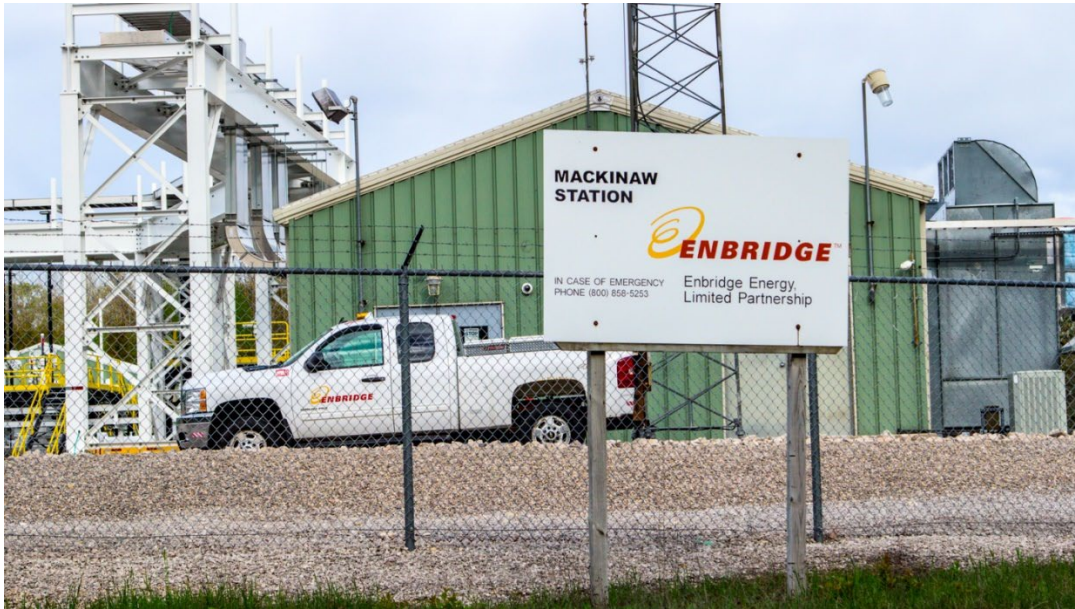


Figure 2. Photo from Progressive Hub

The first step in understanding the dangers inherent to Enbridge's activities is to confront the deceptive advertising blitz that has been undertaken by the fossil fuel giant Enbridge. They have spent millions of dollars injecting falsehoods into the public consciousness. While figures for Enbridge's current financial investment in their Line 5 campaign are inaccessible, according to their website Enbridge invested \$10 billion into their similar Line 3 project in Minnesota. And overall, in 2021, Enbridge generated shareholder returns of 30% and ran an organic capital program of \$65 billion.⁵ These figures illustrate the enormous capital advantage Enbridge has in its advertising campaign on Line 5.

This capital campaign has resulted in billboards, radios, the internet, and the mouths of friendly politicians being used to disseminate falsehoods designed to distract the public from the many alarms that have been raised by experts, activists, and concerned citizens. For example, in 2019, Enbridge ran an ad that depicted a man placing a buoy in the Straits of Mackinac. However, the man was not working for Enbridge but was a government employee of NOAA. Because of the criticism levied, Enbridge made attempts to pull the ad.⁶ Another example of falsehood was an ad ran in Minnesota newspapers that boasted of the tribal engagement for the Line 3 pipeline. This ad also received scathing disapproval from tribal leaders who viewed the process as deeply flawed and mostly for show.⁷ Laid out below are more pervasive and distracting examples, with the truth compared to the Enbridge story.

Enbridge Claims	The Facts
<i>“The shutdown of line 5 would increase heating prices⁸ and put the people of Michigan at risk⁹”</i>	Most of the petroleum products that move through Line 5 are not meant for Michigan, the lines move through the Great Lakes to get to Canadian refineries.
<i>“Construction of the new tunnel will bring jobs to Michigan¹⁰”</i>	Enbridge is required by law to have at least half of its crew made up of Canadian workers and, historically, most of the crew is made up of imported workers.
<i>“Line 5 is the safest way to bring needed fuel to Michigan”</i>	Line 5 poses many environmental and economic risks to Michigan and the Great Lakes. Additionally, Michigan is making strides in becoming carbon neutral. The continued operation of Enbridge pipelines flies in the face of this.
<i>“We are working in concert with Indigenous communities and tribal governments”</i>	Talking to individual Indigenous peoples does not constitute having received Free, Prior, and Informed Consent. In fact, many Indigenous leaders view Enbridge’s efforts as just for show. ¹¹

III. ENVIRONMENTAL RISKS

Governor Gretchen Whitmer took action in 2020 to shut down the current Line 5 pipeline on the grounds that Enbridge had repeatedly broken conditions of the easement signed in 1953 that were put in place to ensure the safe operation of the dual line.¹² Beyond these failures on the part of Enbridge, Line 5 is outdated and at risk of failure due to its age and lack of upkeep.

When it was originally constructed, the lifespan of the Line 5 section meant to run along the bottom of the Mackinac Straits was planned to be 50 years. So as of 2023, the pipeline will have been operating for twenty years past its original decommissioning date. The lines have spent 70 years losing anti-corrosive coatings,¹³ being struck by anchors,¹⁴ and being buffeted by the intense currents within the Straits. Considering this advanced age and documented failures on the part of Enbridge to uphold the conditions of the easement, this action should not be controversial. Nonetheless, there was an immediate response from Enbridge, its industry allies, and the government of Canada, the latter of which has unfortunately tied much of Canada’s economy to fossil fuel extraction.

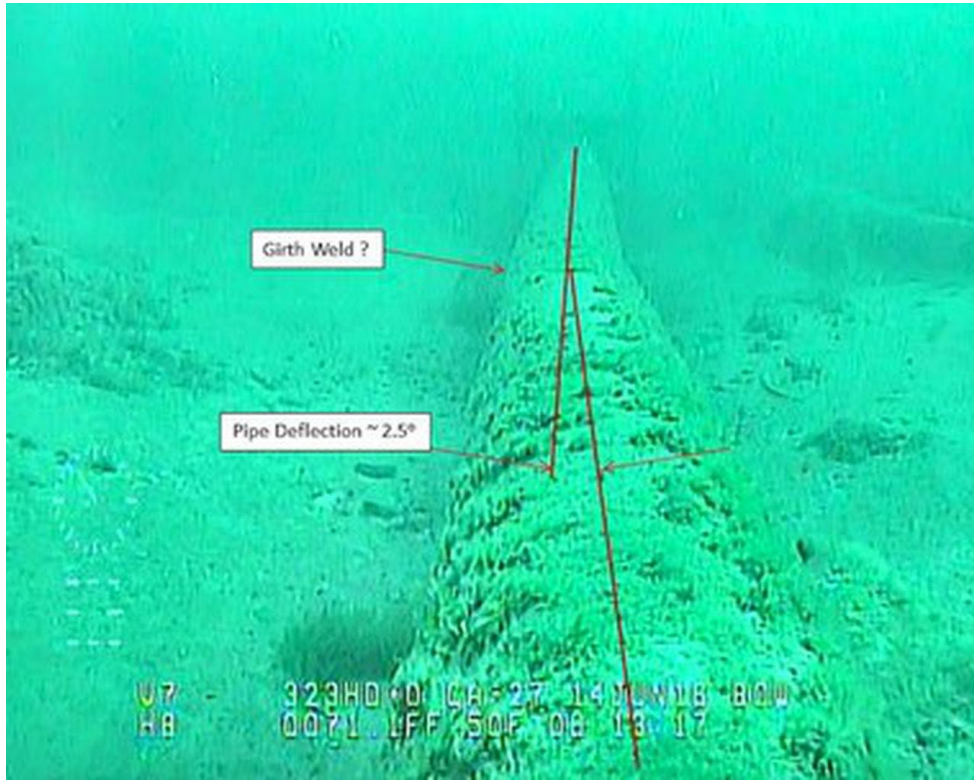


Figure 3. Photo from MLive showing 70-year-old Line 5

Enbridge recognizes the dangers posed by Line 5, which is why the company proposed the Great Lakes Tunnel Project in 2018. The project involves the construction of a concrete-lined tunnel bored through the bedrock beneath the Straits at up to 100 feet deep to house the replacement Line 5 segment.¹⁵ Unfortunately, the reviews and plans for this tunnel have not kept the general well-being in mind. Multiple experts have identified clear faults with both the installation and operation of the proposed replacement line that are being ignored.

One such tunnel expert is Brian O'Mara, Director of Industrial and Power Sector Remediation Solutions at Lone Wolf Resources LLC. He has repeatedly pointed out, in testimony and extensive published analysis, that the pre-design studies undertaken by Enbridge have neglected to investigate serious complications that are likely to be uncovered if a more thorough analysis were performed. One point in particular that O'Mara is focused on is the risk of explosion that exists in the current Line 5 replacement pipeline plans. On February 16, 2022, in public comments delivered to the MSCA (Mackinac Straits Corridor Authority), O'Mara stated that:

“The Enbridge tunnel pre-design studies and cost estimates are inadequate and flawed. Enbridge has not completed a Failure Modes & Effects Analysis for the project, which is inexcusable. If Enbridge doesn't adopt the sealed annulus design, an explosion or fire could kill tunnel workers and collapse the tunnel releasing thousands of gallons of oil or gas into the Straits.”¹⁶

Currents within the Straits of Mackinac are volatile, and any spill would not only result in contamination of water and shorelines in the immediate area of the pipeline failure but the currents will spread the released toxins throughout the entire Great Lakes system¹⁷; what would be a tragedy at any scale would be transformed into an uncontained catastrophe. A quantitative analysis of 840 oil spill cases using a worst-case discharge scenario from Line 5 shows that more than 1,000km of the Lake Huron-Michigan shoreline and specific islands are potentially vulnerable to an oil release in the Straits.¹⁸

The necessary cleanup that would follow would be incredibly complicated from both a logistics and political standpoint as multiple U.S. states and Canadian provinces would be affected. Oil spill clean-up is also extremely time-consuming, environmentally damaging, and expensive. Natural Resource Damage Assessment is the legal process that federal agencies use to evaluate the impacts of oil spills on natural resources, and according to federal law, the damages to natural resources and ecosystems from oil spills must be assessed, monitored, restored, and their related injuries must be compensated. Estimates of natural resource damage in the event of a breach of Line 5 at or near its crossing at the Straits of Mackinac could reach more than \$697 million for a moderate-risk oil spill scenario.¹⁹

IV. ECONOMIC RISKS

Studies have estimated that the economic damage done to key Michigan industries in the case of a pipeline failure from Line 5 ranges from 1.3²⁰ to 5.6²¹ billion dollars. These numbers do not include the cost of cleanup or the increased health issues, both physical and mental, related to toxic contamination of water, food, and air. Enbridge promises that there will be an economic boost associated with the construction of the new Line 5. However, even if this economic boost happens, the costs of a failure would erase the gains and then some. Line 5's location at the Straits is of particular concern because of its proximity to shorelines, navigable waters, and wetlands, and the potential threat to drinking water resources, recreational and tourism opportunities, and commercial shipping and fishing.²² It is also important to acknowledge that the 60 ports on the Great Lakes support more than 128,000 U.S. jobs and collectively generate \$18.1 billion in annual revenue as reported by the U.S. Army Corps of Engineers in 2013.²³

Michigan already has a real-world example of what it costs when a pipeline fails as illustrated by the Kalamazoo River spill that occurred in 2010.²⁴ The National Transportation Safety Board investigation concluded that the spill was caused by a dereliction of Enbridge's responsibility to inspect its line and install proper safety measures.²⁵ The breach poured 843,444 gallons onto the land and waters of Michigan as a result of fatigue cracks and corrosion that could have, and should have, been detected by simple quality control measures and remediated immediately. Overall, Enbridge's lax

attitude towards maintaining oil infrastructure¹ cost Michigan \$1.2 billion alone in cleanup efforts in this case.

Furthermore, A 2018 report from FLOW (For the Love of Water) outlines the economic risks of a “reasonable risk” oil spill case and the estimates show an astronomical economic risk to the region. The following estimates were based on an oil spill scenario involving a release of 2.5 million gallons of crude oil and an affected shoreline of 900 miles across fifteen counties in Michigan, reflecting the real possibility of technological failure and delay in human response. This demonstrates the severity of the threat on a spill of Line 5.

Table 1. Cost Estimates of a Worst-Case Scenario Oil Spill in the Straits of Mackinac²⁶

INDUSTRIES AFFECTED	Cost Estimates of a Spill in the Straits of Mackinac
NATURAL RESOURCE DAMAGES AND RESTORATION	\$697,500,000
TOURISM	\$ 4,823,082,926
COMMERCIAL FISHING	\$61,050,000
MUNICIPAL WATER SYSTEMS	\$233,090,000
COASTAL PROPERTY	\$485,811,163
TOTAL	\$5,603,034,089

V. INDIGENOUS RIGHTS VIOLATED BY LINE 5 AND THE PROPOSED PIPELINE

Leaders representing Anishinaabe people and the US federal government signed the Treaty of Washington in 1836 and the 1855 Treaty of Detroit,²⁷ in which the US recognized Anishinaabe people's rights to live on the land and utilize the natural resources of the Great Lakes. These rights have been challenged repeatedly and the Anishinaabe have resisted every attempt to impinge what is theirs by law. Now, in the 21st century, it has been confirmed in court multiple times that the usufructuary rights held by the Anishinaabek peoples are valid and perpetual. As such, it is illegal to undertake a project that threatens the preservation of the Anishinaabe way of life. The risk posed by Enbridge's proposed

¹ See Appendix I

actions are clear but also involve international ramifications. The U.S. is a signatory of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) which clearly states that there is an expectation that member nations (including indigenous peoples) receive Free, Prior, and Informed Consent (FPIC). Instead, both the U.S. and Canadian governments, with the help of Enbridge, have withheld information and ignored the concept of consent entirely from indigenous peoples, including the Anishinaabe.

Some US domestic statutes raise serious questions about the acceptability of the construction of a new Line 5 pipeline or the continued operation of the current line. The National Historic Preservation Act (NHPA) was enacted to make sure that sites of cultural value are preserved.²⁸ While investigating anchor strikes on the current pipeline, the Anishinaabek Caucus discovered an archeological site in the Straits of Mackinac²⁹ that qualifies as a Traditional Cultural Place and belongs on the National Register of Historic Places.³⁰ In this case specifically, there are Odawa and other native burial sites on the bottom of the Straits of Mackinac. These sites are where “Ghost Suppers”, or “Feast of the Dead” are held annually in the fall. This tradition has immense significance as it goes back thousands of years.³¹

Not only is this a legally protected site of cultural importance to the Anishinaabe, it also has tangible benefits for Anishinaabe communities and could foster new research on history. There has already been a similar site studied by John O’Shea of the University of Michigan showing a pattern that, when identified, will lead to meaningful insights into the history of the state of Michigan and the connections of Anishinaabek people to their homeland. Many Indigenous scholars and leaders speak of the psychological, political, and cultural benefits of archeological studies that investigate the history of Indigenous occupation of the lands that have been settled. Studies done here need to be carried out respectfully. Being Indigenous and letting Indigenous peoples oversee their historical knowledge are a couple of specific ways to show this respect. Furthermore, it has been documented that collaboration between Indigenous groups/tribal governments and researchers forms strengthened relationships and gives Indigenous communities a sense of cultural stability in the face of a settler nation.³² Overall, the installation of the replacement Line 5 pipeline will disrupt the important archeological discovery of remains under the Straits of Mackinac and this disruption will have severely negative effects on the Anishinaabe and scholarly ethics generally.

While the physical construction of the line will have significant impacts, Line 5 will also increase the danger of sex trafficking and worsen the problem of missing and murdered Indigenous relatives (MMIR). The movement to create real protection and awareness for missing and murdered Indigenous relatives (MMIR) has needed to exist for too long. When transient work crews, housed in industry standard “man camps”,³³ move along a pipeline route to install the infrastructure, the rates of violence against Indigenous women, transgender persons, and Two Spirit individuals rise. More specifically, in February of 2021, pipeline workers along Line 3 (operated by Enbridge in Northern Minnesota) were arrested for sex trafficking. And then in the Missing and Murdered Indigenous Women (MMIW) Report released by the Canadian government, violence against Indigenous women (such as

sex trafficking) is described as an epidemic.³⁴ But what has not risen in the face of these facts, is an effective strategy for preventing these attacks or holding the individuals and companies responsible. The danger Enbridge's Line 5 and the proposed tunnel under the Straits of Mackinac brings in light of these facts is a significant cause for concern.



Figure 4. Photo by Karen Turnbull from Water is Life Festival

VI. WORKING TOWARDS A SUSTAINABLE FUTURE

Leaving the Line 5 pipeline behind, an alternative vision for the future based on environmental justice is a future centered around a Traditional Ecological Knowledge (TEK) concept called “*living well*” or “*buen vivir*.” This concept guides the understanding of many Indigenous peoples to sustainable development. It recognizes self-determination and rights to the environment. Development, rather than being violent, is about serving present needs. It has a goal of sustainability for those currently here and those that will come in the future.³⁵

To work towards a sustainable future, Dr. Elizabeth A. Stanton, Director and Senior Economist of the Applied Economics Clinic reports that “Michigan’s energy needs can be met without propane through electrification”.³⁶ Stanton along with others on the Upper Peninsula Energy Task Force Committee recommended steps such as modernizing the

electrical grid, reducing energy waste, and developing renewable energy and storage.³⁷ A future built more sustainably through renewable energy without fossil fuels would meet this goal of “living well.”

The most critical and necessary policy recommendation to work towards this future would be to stop Line 5 and the proposed pipeline. A press release from the Bay Mills Tribe reads, “Enbridge also fails to demonstrate that the Project is in the public interest. Indeed, the opposite is true—the reasonably foreseeable detriments far outweigh any possible benefit of the tunnel”.³⁸ Stopping Line 5 and the proposed pipeline would eliminate the environmental risk and economic risks associated with the project. Additionally stopping Line 5 and the proposed pipeline would be a step towards acknowledging the sovereignty of the Anishinaabe people and correcting the Indigenous rights violations that have occurred. It would begin to build a sustainable path for current and future generations that is centered around protecting Michigan’s greatest natural resource, the Great Lakes.



Figure 5. Photo from Stop Line 3 .org

VII. POLICY RECOMMENDATIONS

In the face of the injustices, illegalities, and existential threats posed by Line 5, policymakers must act. Below are our suggestions for what can be done now to protect the people and future of Michigan.

- Offer resolutions to the state legislature that recognizes the threat Line 5 poses to the treaty and human rights of the Anishinaabe and other Indigenous and First Nation peoples that have lived along the Great Lakes since time immemorial.
- Line 5 should become a priority part of legislators' agendas, brought up regularly at committee meetings and public speaking events. Legislators must illustrate the connections that Line 5 has to the many issues Michigan and the United States face. Line 5 impacts labor rights, decarbonization, racial justice, human health, and multiple sectors of the economy that directly affect the working class.
- Pass legislation to terminate the 1953 easement that Enbridge is in default of.
- Deny the permit for construction of Enbridge's Line 5 tunnel project by statute and support the legislation in any resultant litigation.
- Hold public committee hearings examining and highlighting the impacts of Enbridge's activities on the human and treaty rights of the Anishinaabe and other Indigenous peoples in the state of Michigan. These committee hearings must be designed with input and permission from Indigenous communities.
- Designate the Straits of Mackinac as an official State Park and submit an official application to the US Department of the Interior to have the Straits recognized as a Traditional Cultural Property (TCP)
 - This application for TCP protections should be made based on both the 2018 discovery of a significant archeological site and the centrality of the Straits to the cultural stories and lifeways of multiple federally recognized tribes.
- Pass a package similar to the one offered in 2019 by Yousef Rabhi (D-Ann Arbor), Laurie Pohutsky (D-Livonia), and Rachel Hood (D-Grand Rapids):
 - water held in trust (Rabhi)
 - increased DNR regulatory purview (Pohutsky)
 - ban shipping bottled water (Hood)

Appendix I

The following table from 350.org summarizes Enbridge spills in the US and Canada from 1996-2014. This *partial* list does not cover Enbridge spills from 2014 to the present. However, it does illustrate their “track record of pervasive, systemic environmental and safety issues”³⁹ and their history of repeated gross negligence in maintaining their oil infrastructure.

Table 2. Enbridge Liquid Spills in Canada and the United States from 1996-2014

Year	Number of spills	Quantity in barrels	Quantity in us gallons
1996	49	13,698	575,316
1997	47	19,853	833,826
1998	39	9,830	412,860
1999	54	28,760	1,207,920
2000	48	7,513	315,546
2001	33	25,980	1,091,160
2002	48	14,683	616,686
2003	62	6,410	269,220
2004	69	3,252	136,584
2005	70	9,825	412,650
2006	61	5,663	237,846
2007	65	13,777	578,634
2008	80	2,682	112,644
2009	103	8,441	354,522
2010	91	34,258	1,438,836
2011	58	2,284	95,928
2012	85	10,224	429,408
2013	114	4,298	180,516
2014	100	2,943	123,606
TOTAL	1,276	224,374	9,423,708

Data compiled from Enbridge websites; archived data available from 350.org upon request.

¹ September 15 & 2021. (n.d.). *Climate Change & Economic Experts' Testimony Demonstrates Why Enbridge Line 5 Tunnel Permit Must be Denied by MPSC*. Michigan Climate Action Network.

https://www.miclimateaction.org/climate_change_economic_experts_testimony_demonstrates_why_enbridge_line_5_tunnel_permit_must_be_denied_by_michigan_public_service_commission

² Michigan Climate Action Network.

³ *Climate Clock: Find out more - Concordia University*. (n.d.).

<https://www.concordia.ca/content/concordia/en/news/climateclock/information.html>

⁴ *Climate Clock: Find out more - Concordia University*. (n.d.).

<https://www.concordia.ca/content/concordia/en/news/climateclock/information.html>

⁵ Enbridge. (n.d.). *Letter to Shareholders*. <https://www.enbridge.com/reports/annual-report-2021/letter-to-shareholders>

⁶ Perkins, William T. (2019, October 2). *Enbridge ad—Which ran in several Northern Michigan newspapers—Deemed “misleading.”* <https://www.petoskeynews.com/story/news/local/2019/10/02/enbridge-ad-which-ran-in-several-northern-michigan-newspapers-deemed-misleading/44238167/>

⁷ Perkins, William T. (2019, October 2). *Enbridge ad—Which ran in several Northern Michigan newspapers—Deemed “misleading.”* <https://www.petoskeynews.com/story/news/local/2019/10/02/enbridge-ad-which-ran-in-several-northern-michigan-newspapers-deemed-misleading/44238167/>

⁸ Enbridge. (n.d.). *Does Michigan really need Line 5?* <https://www.enbridge.com/projects-and-infrastructure/public-awareness/line-5-michigan/does-michigan-really-need-line-5>.

⁹ Enbridge. (2021, February 10). *Dangerous deep freeze underscores Line 5's importance*. <https://www.enbridge.com/projects-and-infrastructure/public-awareness/line-5-newsroom/dangerous-deep-freeze-underscores-line-5-importance>.

¹⁰ Enbridge. (n.d.). *How many jobs will the Great Lakes Tunnel Project create?* <https://www.enbridge.com/projects-and-infrastructure/public-awareness/line-5-answering-your-questions/how-many-jobs-will-the-great-lakes-tunnel-project-create>.

¹¹ Atkin, E. (2021, July 12). *Enbridge is plastering Minnesota newspapers with ads*. <https://heated.world/p/the-land-of-10000-pipeline-ads>

¹² Michigan.gov (2020, November 13). *Governor Whitmer Takes Action to Shut Down the Line 5 Dual Pipelines through the Straits of Mackinac After a Reasonable Transition Period to Protect the State's Energy Needs*.

<https://www.michigan.gov/whitmer/news/press-releases/2020/11/13/governor-whitmer-takes-action-to-shut-down-the-line-5-dual-pipelines-through-the-straits-of-mackinac>

¹³ Ellison, Garret. (2017, June 2). *Enbridge was violating Line 5 easement for years, documents show—Mlive.com*.

https://www.mlive.com/news/2017/06/line_5_unsupported_spans.html

¹⁴ LeBlanc, B. (2019, July 8). *Mystery shrouds Great Lakes anchor strikes amid Line 5 worries*. The Detroit News.

<https://www.detroitnews.com/story/news/local/michigan/2019/07/08/anchor-strike-biggest-risk-line-5-few-incidents-great-lakes/1616215001/>

¹⁵ Enbridge (n.d.). *The Great Lakes Tunnel Project*. <https://www.enbridge.com/projects-and-infrastructure/public-awareness/line-5-michigan/great-lakes-tunnel-project>

¹⁶ Oil & Water Don't Mix: Keep Oil Out of the Great Lakes. (2022, February 16). *Tunnel Expert Brian O'Mara Warns of Proposed Enbridge Great Lakes Tunnel Explosion Risk*. <https://www.youtube.com/watch?v=1b04aZwyCYs>

¹⁷ Schwab, David J. (2014). *Straits of Mackinac Contaminant Release Scenarios: Flow Visualization and Tracer Simulations*. Research Report for the National Wildlife Federation Great Lakes Regional Center.

<https://graham.umich.edu/media/files/mackinac-report.pdf>

¹⁸ Schwab, David J. (n.d.). *Statistical Analysis of Straits of Mackinac Line 5 Worst Case Spill Scenarios*

¹⁹ Richardson, R. B., & Brugnone, N. (n.d.). *Oil Spill Economics: Estimates of the Economic Damages of an Oil Spill in the Straits of Mackinac in Michigan*.

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- ²⁰ Melstrom, R. T., Reeling, C., Gupta, L., Miller, S. R., Zhang, Y., & Lupi, F. (2019). *Economic damages from a worst-case oil spill in the Straits of Mackinac*. *Journal of Great Lakes Research*, 45(6), 1130–1141. <https://doi.org/10.1016/j.jglr.2019.09.003>
- ²¹ Richardson, R. B., & Brugnone, N. (n.d.). *Oil Spill Economics: Estimates of the Economic Damages of an Oil Spill in the Straits of Mackinac in Michigan*. 43.
- ²² Melstrom, R. T., Reeling, C., Gupta, L., Miller, S. R., Zhang, Y., & Lupi, F. (2019). *Economic damages from a worst-case oil spill in the Straits of Mackinac*. *Journal of Great Lakes Research*, 45(6), 1130–1141. <https://doi.org/10.1016/j.jglr.2019.09.003>
- ²³ Richardson, R. B., & Brugnone, N. (n.d.). *Oil Spill Economics: Estimates of the Economic Damages of an Oil Spill in the Straits of Mackinac in Michigan*. 43.
- ²⁴ *Accident Investigations—NTSB - National Transportation Safety Board*. (n.d.). https://web.archive.org/web/20120630002212/https://www.nts.gov/investigations/2010/marshall_mi.html
- ²⁵ National Transportation Safety Board. (n.d.). *Enbridge Incorporated Hazardous Liquid Pipeline Rupture and Release* <https://www.nts.gov/investigations/Pages/DCA10MP007.aspx>
- ²⁶ Richardson, R. B., & Brugnone, N. (n.d.). *Oil Spill Economics: Estimates of the Economic Damages of an Oil Spill in the Straits of Mackinac in Michigan*. 43.
- ²⁷ Manypenny, George W., & Gilbert, Henry C. (1855, July 31). “TREATY WITH THE OTTAWA AND CHIPPEWA.” https://www.saulttribe.com/images/downloads/history%20and%20culture/story%20of%20our%20people/1855_treaty_of_ottawa_chippewa.pdf
- ²⁸ Section 1 of the National Historic Preservation Act, Pub. L. No. 89-665, as amended by Pub. L. No. 96-515, [94 STAT. 2987 Public Law 96-515 96th Congress An Act](#)
- ²⁹ Network, E. N. (2021, April 19). *Michigan tribe seeks cultural property protection in path of Line 5 project*. *Great Lakes Now*. <https://www.greatlakesnow.org/2021/04/cultural-property-protection-michigan-line-5/>
- ³⁰ Parker, Patricia L., & King, Thomas F. (1992). *National Register Bulletin 38*. U.S. Department of the Interior. <https://www.nps.gov/subjects/nationalregister/upload/NRB38-Completeness.pdf>
- ³¹ Hemenway, E. P. (n.d.). *TESTIMONY OF ERIC HEMENWAY ON BEHALF OF THE LITTLE TRAVERSE BAY BANDS OF ODAWA INDIANS*. <https://mi-psc.force.com/sfc/servlet.shepherd/version/download/068t00000TUeh4AAD>
- ³² Kelley, A. D., Neller, A. J., Gover, C. S. C., & Editors, A. T.-I. (2022). *Some Indigenous Perspectives on Artifact Collecting and Archaeologist–Collector Collaboration*. *Advances in Archaeological Practice*, 10(1), 10–13. <https://doi.org/10.1017/aap.2021.39>
- ³³ admin. (2021, March 8). *What Is a Man Camp?*. Iron Guard Housing. <https://ironguardhousing.com/what-is-a-man-camp/>
- ³⁴ *What do pipelines have to do with sexual violence?*. Virginia Sexual & Domestic Violence Action Alliance. (2021, April 22). https://vsdvalliance.org/press_release/what-do-pipelines-have-to-do-with-sexual-violence/
- ³⁵ McGregor. *Living Well With the Earth*.
- ³⁶ *Climate Change & Economic Experts’ Testimony Demonstrates Why Enbridge Line 5 Tunnel Permit Must Be Denied by MPSC*. (2021, September 15).
- ³⁷ Team. *UP Energy Task Force Sends Final Energy Supply Report to Gov. Whitmer*.
- ³⁸ Chizewer et al. *Comments of Bay Mills Indian Community Seeking the Denial of Enbridge’s Application for a Permit for the Line 5 Tunnel and Pipeline Project Under Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act*.
- ³⁹ Enbridge Major Spills 1996-2014 https://world.350.org/kishwaukeee/files/2017/02/EnbridgeMajorSpills_1996-2014.pdf