

To: Heidi Grether, DEQ Director  
Valerie Brader, MAE Executive Director  
Members of the Michigan Pipeline Safety Advisory Board (MPSAB)

From: Bobie Crongeyer, Straits Area Concerned Citizens for Peace, Justice, and the Environment

June 12, 2017 - Public Comment

My name is Bobie Crongeyer and I am also with the Straits Area Concerned Citizens group.

We're all aware of - and some of us have even read - the various contingency plans that are in place with claims of how quickly Enbridge can respond to a spill in the Straits of Mackinac.

The July 12, 2016 article by Andrew Nikiforuk of Hakai Magazine confirms our worst fears about spill response and cleanup procedures. The article is titled "Why We Pretend to Clean Up Oil Spills" with the subtitle "Six years after Deepwater Horizon spewed oil into the Gulf of Mexico, we still have no idea what we're doing."

From the article: "The hard scientific reality is this: a big spill is almost impossible to contain because it is physically impossible to mobilize the labor needed and current cleanup technologies in a timely fashion."

Everyone here is familiar with the U of M spill model showing the 700 miles of shoreline that could be affected when a spill occurs in the Straits. Alarmingly, the Enbridge contingency plan does not cover Presque Isle County, which borders Cheboygan County at the tip of the mitt, and those counties running southeast along the shoreline - down to Sanilac County. Along the western shoreline, counties south of Emmet County are not covered. Even though the Coast Guard and EPA have assured us that these counties will be covered under *their* plans – the local first responders in those counties are *not* part of Enbridge drills and there are no response equipment trailers located in these counties.

So why do so many in the general public believe that these contingency plans, with inventories of equipment and techniques, will work – even in icy conditions? As the article states, “Part of the illusion has been created by ineffective technologies adopted and billed by industry as ‘world class’”.

How many times have we heard about Enbridge’s latest booms and skimmers? The hard facts are - the Straits of Mackinac, for most of the year, have currents that are too fast, waves too high, water too deep, or ice cover that is too unstable, for conventional oil spill containment equipment to be used. There are not enough boats, oil booms, specialized equipment and trained personnel within a reasonable distance of the Straits of Mackinac to contain an oil spill within the first 12 hours after a release. These facts are being ignored by Enbridge, PHMSA, the U.S. Coast Guard, the U.S. Environmental Protection Agency and each of the State of Michigan agencies represented on this board.

Jeffrey Short, retired NOAA research chemist, states “What I find the most disturbing is the tendency for responsible authorities and industry to adopt technologies mainly because of their optics and with scant regard for their efficacy. In addition, chaos rules in the aftermath of a spill. The enormous political pressure to do *something* routinely sacrifices any duty to properly evaluate what kind of response might actually work over time. Industry says ‘we just want to clean it up’, yet their demonstrative ability to clean it up sucks.”

We must not allow the destruction of our precious waters in the Straits of Mackinac.  
Shut down Line 5 NOW!