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GOVERNOR

STATE OF MICHIGAN
MICHIGAN STRATEGIC FUND
STATE HISTORIC PRESERVATION OFFICE

QUENTIN L. MESSER, JR.
PRESIDENT

October 14, 2022

KATIE L. OTANEZ
U.S. ARMY CORPS OF ENGINEERS – DETROIT DISTRICT
477 MICHIGAN AVENUE
DETROIT, MICHIGAN 48226

RE: SHPO scoping comments, Notice of Intent to Prepare a Draft Environmental Impact Statement for the Line 5 Tunnel Project, Mackinac and Emmet Counties, Michigan

Dear Ms. Otanez,

Under the authority of Section 106 of the National Historic Preservation Act, as amended, and as a Cooperating Agency under the National Environmental Policy Act (NEPA), the Michigan State Historic Preservation Office (SHPO) has reviewed the above-cited Notice of Intent (NOI) prepared by the Department of Army, Corps of Engineers, Detroit District (USACE), which was published on August 15, 2022. The NOI reports a proposal to construct a tunnel within the bedrock below Lakes Michigan and Huron at the Straits of Mackinac (Straits) for the purpose of housing a segment of the Line 5 oil and gas pipeline. The Line 5 pipeline, which is owned and operated by Calgary based Enbridge Inc. (Enbridge), is 645 miles in length and runs through the state of Michigan en route to Sarnia, Canada. SHPO appreciates the opportunity to provide scoping comments on the proposal and to make recommendations for the forthcoming Draft Environmental Impact Statement (DEIS).

Cultural resources, under NEPA, include historic properties as defined by Section 106 of the National Historic Preservation Act of 1966, as amended (NRHP). In addition to architectural resources, archaeological sites, shipwrecks, cemeteries, statues and other objects, cultural resources also include cultural uses of physical and natural environments, cultural and social institutions, religious practices, and lifeways. The USACE is considering cultural resources as defined under NEPA; therefore, SHPO expects that the agency will consider all cultural resources in the DEIS. SHPO hopes to offer guidance to identify possible cultural resources that may be viewed as cultural landscapes and Traditional Cultural Properties (TCPs) and to inform the potential impacts of the proposed project to all cultural resources within the area of the Straits.

The “primary Federal involvement” as stated in the introduction of the NOI involves “the discharge of dredged or fill material into waters of the United States, and the construction of structures and/or work that may affect navigable waters”. It is the opinion of SHPO that this definition of the involvement of USACE in the proposed tunnel project is highly constrained. The characterization does not capture the scale and complexity of the proposed project, as the agency will potentially permit the construction of a tunnel that measures approximately 21 feet in diameter and will be excavated within the bedrock that lies below the lakebed of Lakes Michigan-Huron in the Straits of Mackinac.

To summarize the NOI, the proposed action would include the use of boring machinery to tunnel below the Straits to remove approximately 364,000 cubic yards of rock that would be transported via truck on local roadways to offsite upland disposal sites. Tunnel boring discharge would be intermittently released into the Straits. To construct the tunnel, temporary and permanent facilities would be constructed in the



uplands as well as offshore. It is the understanding of SHPO that temporary terrestrial facilities would include stormwater ponds, spoil storage and management areas, water treatment plant(s), intake structures, discharge pipe(s), materials storage and staging areas, access drives, offices and parking facilities, power substation(s), generators, and industrial lighting. Permanent terrestrial facilities would include stormwater ponds, outfall structures, access drives, and ventilation structures. Upon completion of the tunnel, the existing Enbridge Line 5 dual pipeline would be abandoned in place and a new 30-inch Enbridge pipeline would be constructed within the tunnel. The NOI mentions the possibility of co-location of other utilities within the tunnel after it is completed.

The above-listed range of actions related to the proposed project are extensive and raise several questions for SHPO regarding the impacts of the action on historic properties and traditional cultural landscapes within the Limits of Disturbance, the Straits of Mackinac, and the Great Lakes region. The enclosed SHPO Scoping Comments contain recommendations to assess, analyze, disclose, and commit to protective measures related to potential impacts on (1) the Straits as comprising an apparent TCP for multiple Tribes (2) the Straits as essential for the ability to exercise of Tribal treaty rights and Tribal traditional lifeways; (3) terrestrial archaeological sites, (4) submerged cultural sites, and (5) architectural and above-ground historic sites. Additionally, enclosed is a table entitled *Possible Interested Parties* which contains a list of organizations and institutions that should receive a copy of the DEIS from USACE to allow these groups the opportunity to provide comment if they should choose, as they may be affected by the proposed undertaking. If permitted, the construction of the tunnel would be irreversible. SHPO strongly urges the USACE to ensure that the DEIS assesses and analyzes the lifespan of the tunnel and long-term implications of the undertaking, including the potential impacts of spills and possible risks that could potentially impact cultural resources and TCPs.

As a Cooperating Agency and consulting party, SHPO appreciates this opportunity to offer scoping comments on the NOI. We would also welcome an opportunity to further discuss our scoping comments with USACE and the other Cooperating Agencies. Sarah Surface-Evans, SHPO Senior Archaeologist (SurfaceEvansS1@michigan.gov) and Scott Slagor, Cultural Resources Protection Manager (Slagor2@michigan.gov) are the primary contacts for coordination and review.

Sincerely,



Martha MacFarlane-Faes
Deputy State Historic Preservation Officer

MMF:SSE:AK:SES:KK

Enclosures:

- (1) SHPO Scoping Comments
- (2) Possible Interested Parties

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- I. **Comments on Project Scope:** SHPO recommends that UASCE define the scope of the project by the environmentally, culturally, and economically understood definition of the Straits of Mackinac region, which includes the Lakes Michigan-Huron watershed.

By its nature, the Straits is an interrelated landscape composed of both water and land that has deep historical and cultural significance as a place people have occupied for millennia. The DEIS scope should address possible impacts to the Straits region as one of the most prominent cultural landscapes in the State of Michigan. The Straits contains an extremely high concentration of terrestrial and submerged archaeological, and above-ground cultural sites, as well as being considered an apparent Traditional Cultural Property (TCP) among Indigenous communities in the Great Lakes region. The unique concentration of cultural heritage sites in the Straits region also makes heritage tourism the principle economic driver in the region.

- A. **Geographic Definition:** The Straits are defined as the geographic area where Lakes Michigan and Huron meet. The waters of the Straits are roughly 70 km wide and span from the DeTour Point on the east side in Lake Huron to Beaver Island on the west side in Lake Michigan.¹ The Straits are approximately 5-7 km wide across and include Mackinac Point in the Lower Peninsula and St. Ignace in the Upper Peninsula. From an environmental perspective, multiple independent models have demonstrated the interconnectedness of the Straits with the larger Great Lakes watershed due to currents and hydrological factors.² The impact of oil spills or leakages originating from the Straits to the Great Lakes watershed has been modeled by several independent scholars.³
- B. **Cultural Definition:** Historic and cultural data also support an enlarged DEIS scope.
1. The SHPO State Archaeological Site File (SASF) indicates that there are 358 previously identified terrestrial archaeological sites located in the Straits region along the shores of Lakes Michigan and Huron or within 1-mile of waterways directly connected to the Straits. These resources represent more than 1.5% of all known archaeological sites in the State of Michigan and are concentrated in this one small portion of the state. Of the Straits archaeological sites, one is a National Historic Landmark (NHL) designated site and 8.6% of the sites are determined eligible for or are

¹Dalrymple, Robert. (2022). A review of the morphology, physical processes and deposits of modern straits. *Geological Society, London, Special Publications* (2022), 523 (1). <https://www.lyellcollection.org/doi/pdf/10.1144/SP523-2021-76>

² <https://www.glerl.noaa.gov/res/straits/>

³ Schwab, David J. (2016) Statistical Analysis of Straits of Mackinac Line 5: Worst Case Spill Scenarios. University of Michigan, Water Center. <https://graham.umich.edu/media/pubs/Mackinac-Line-5-Worst-Case-Spill-Scenarios.pdf>; Independent Risk Analysis for the Straits Pipelines - Final Report. (2018). <https://mipetroleumpipelines.org/document/independent-risk-analysis-straits-pipelines-final-report>

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listed in the National Register of Historic Places (NRHP). The vast majority (76.4%) of these sites are unevaluated. Archaeological sites of the Straits span the entire period of human habitation in the region, from Paleoindian, ca. 10,000 BP to historic mid-twentieth century periods. Roughly 45% of the sites date to the pre-contact or prehistoric periods and 50% date to the post-contact or historic periods.

2. The Straits are also designated as a Michigan Underwater Preserve.⁴ The Straits of Mackinac Shipwreck preserve includes a dozen documented shipwrecks. There are 90 shipwrecks or submerged cultural sites known within the Straits region and an additional 182 submerged sites within the Lakes Michigan-Huron watershed. More than 18% of known submerged cultural resources in the State of Michigan are located within the Straits region. The larger watershed includes the Thunder Bay National Marine Sanctuary and the DeTour Passage Underwater Preserve. The Thunder Bay National Marine Sanctuary covers 4,300 square miles of northern Lake Huron and includes over 100 documented shipwrecks⁵, as well as unique submerged cultural landscapes.⁶ Because of the concentration of submerged cultural resources, and many associated terrestrial resources pertaining to maritime history, the Straits could be considered a Maritime Cultural Landscape (MCL). MCLs include the constellation of sites, places, and objects related to human use of maritime spaces. This includes ports, harbors, lighthouses, fishing and trade routes, ships and shipwrecks, settlements, and any other cultural relationship to the water. The Straits as a MCL requires additional study and consideration. Additionally, due to isostatic rebound and changing lake levels during the post-glacial period, there is the possibility for pre-contact submerged cultural landscapes to be located within the Straits. Currently, researchers are utilizing recently published data from NOAA hydrographic surveys⁷, to identify submerged anomalies that may be cultural in origin. These unevaluated sites could prove to be as significant as those discovered on the Alpena-Amberly Ridge.⁸

⁴ Michigan Underwater Preserves -Sites, Department of Environment, Great Lakes, and Energy: <https://www.michigan.gov/egle/about/organization/Water-Resources/shipwrecks/michigan-underwater-preserves-sites>

⁵ Thunder Bay National Marine Sanctuary: <https://thunderbay.noaa.gov/>

⁶ Pre-historic Archaeology on the Alpena-Amberly Ridge: <https://sites.lsa.umich.edu/lakehuron-arch/pre-historic-archaeology-on-the-alpena-amberly-ridge/>

⁷ Hydrographic Survey Data, Office of Coast Survey, National Oceanic and Atmospheric Administration, <https://nauticalcharts.noaa.gov/data/hydrographic-survey-data.html>

⁸ O'Shea, John and Guy Meadows (2009). Evidence for early hunters beneath the Great Lakes. Proceedings of the National Academy of Sciences 106(25):10120-3. https://www.researchgate.net/publication/26275965_Evidence_for_early_hunters_beneath_the_Great_Lakes

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3. The Straits also contains a high concentration of significant above-ground, architectural sites that are National Historic Landmarks (NHL) or listed in or eligible for listing in the NRHP. There are 58 above-ground cultural sites in the Straits. Of these, 52% are NHLs or contributing elements to NHLs. An additional 31% of the sites are listed in the NRHP, with 8.6% eligible for the NRHP. Roughly 7% are listed in the Michigan State Register of Historic Sites. The larger Lake Michigan-Huron watershed hosts an additional 41 above-ground cultural sites. The vast majority (63.4%) of these resources are also listed in the NRHP. Many of these above-ground cultural sites include lighthouses and associated navigational structures, iconic places that are central to Great Lakes cultural identity and the Straits as an MCL.

4. The Straits appear to have the characteristics of a TCP. The Straits have “association with cultural practices or beliefs of a living community that (a) are rooted in that community’s history, and (b) are important in maintaining the continuing cultural identity of the community.”⁹ The Straits are the ancestral homeland to the Anishinaabek, specifically the Ottawa and Chippewa nations who ceded the land in the 1836 Treaty of Washington. There are two historic Native American reservations with boundaries in the Straits region, Les Cheneaux Reservation and Little Traverse Reservation. Other tribes that have historic connections to the Straits region include the Mississauga, Menominee, Potawatomi, Ojibwa, Huron, and Fox and Sauk. The Bay Mills Indian Community, Grand Traverse Band of Ottawa and Chippewa Indians, Little River Band of Ottawa Indians, Little Traverse Bay Bands of Odawa Indians, and Sault Ste. Marie Tribe of Chippewa Indians all retain treaty rights to waters ceded in the 1836 treaty. Their tribal treaty rights were reaffirmed by the 2000 Consent Decree.¹⁰ These treaty rights include tribal fisheries and other traditional economies supported by natural resources in the Straits region.

As indicated in the independent analysis published by Michigan Technological University, an oil spill in the Straits could have devastating consequences for fisheries in Lakes Michigan and Huron.¹¹ In an effort to recognize tribal sovereignty and cultural connection to the waters of the Great Lakes, Governor Granholm signed the Intergovernmental Accord between the Federally Recognized Tribes in Michigan and the Governor

⁹King, Thomas F. (2005). What are Traditional Cultural Properties? *The Applied Anthropologist*, 25(2),125-130. https://www.academia.edu/4326442/What_Are_Traditional_Cultural_Properties

¹⁰ [2000 Great Lakes Consent Decree \(michigan.gov\)](https://www.michigan.gov/2000-Great-Lakes-Consent-Decree)

¹¹ Independent Risk Analysis for the Straits Pipelines - Final Report. (2018).

<https://mipetroleumpipelines.org/document/independent-risk-analysis-straits-pipelines-final-report>

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of the State of Michigan Concerning the Protection of Shared Water Resources¹² in 2004. Actions of concern specifically called out in the Accord include dredging, wastewater treatment, and wetland development – all of which are planned in this proposed action.

Another concern for Indigenous communities is the ability to continue to access and harvest culturally significant resources from the region, such as maple sugar, wild rice, birch bark, clay for pottery, fish and other animals and water from the Straits itself¹³. In Traditional Ecological Knowledge (TEK) these resources are intertwined with cosmology and spiritual practice.¹⁴ Place-based cultural and ecological knowledge is an essential characteristic of a TCP.¹⁵ The myriad of pre-contact and post-contact Indigenous archaeological sites in the Straits, which includes villages, cemeteries, earthworks, trading outposts, and other types of sites, illustrates the persistent use of this apparent cultural landscape over many millennia. These places remain locales that tribal members know and continue to visit, care for, and protect in culturally prescribed ways. Beyond this, the Straits is viewed as a sacred place because it is tied to deeply held cultural beliefs, such as the Ottawa and Chippewa origin stories and their cosmology.

- C. **Economic Definition:** The Straits region has the highest rate of heritage tourism in the state. In 2018 the Straits region “was named as the number one North American destination by TripAdvisor.”¹⁶ Tourism in Michigan represents a 13.5 billion dollar industry that is generated by 121.2 million person-trips annually, as of 2021.¹⁷ The Straits region includes three of Michigan’s ten economic Development Regions.¹⁸ Data published by the Michigan Economic Development Corporation in the *Michigan Travel USA Overnight 2021 Report*¹⁹ demonstrates that cultural and heritage tourism make up a substantial share of tourism dollars

¹² Intergovernmental Accord between the Federally Recognized Indian Tribes in Michigan and the Governor of the State of Michigan Concerning Protection of Shared Water Resources, May 12, 2004: <https://www.michigan.gov/-/media/Project/Websites/formergovernors/Folder6/Accord.pdf?rev=d7a94f31d2354b659a7901919a4855ed>

¹³ Independent Risk Analysis for the Straits Pipelines - Final Report. (2018).

<https://mipetroleumpipelines.org/document/independent-risk-analysis-straits-pipelines-final-report>

¹⁴ Traditional Ecological Knowledge is defined through reinterpretation of culture and history, and can be distorted by political, social, and cultural objectives of the time. From, Integrated Coastal Management in the Japanese Satoumi, 2019. <https://www.sciencedirect.com/topics/earth-and-planetary-sciences/traditional-ecological-knowledge>

¹⁵ King, Thomas F. (2005). What Are Traditional Cultural Properties? *The Applied Anthropologist* 25:2:125-130. https://www.academia.edu/4326442/What_Are_Traditional_Cultural_Properties

¹⁶ Nelson, Elliot. (2020). The Straits of Mackinac: Connecting People, Places and so Much More <https://www.canr.msu.edu/news/the-straits-of-mackinac-connecting-people-places-and-so-much-more-msg20-nelson20>

¹⁷ Pure Michigan: <https://www.michigan.org/industry/researchandreports>

¹⁸ <https://www.michigan.gov/mdard/business-development/grow-your-business>

¹⁹ <https://www.michigan.org/industry/researchandreports>

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generated within the Straits. On average, cultural and heritage tourism is more prevalent in this region than compared with other parts of Michigan, and the country.

In Mackinac County in the Upper Peninsula, “the largest seasonal employer is the Grand Hotel on Mackinac Island, and the largest year-round employer is the Sault Tribe of Chippewa Indians. The growing tourism industry is currently built around the many attractions in St. Ignace and on Mackinac Island, National Forests, Lakes Huron and Michigan, numerous rivers, streams, inland lakes, public and private campgrounds”²⁰. “In Michigan, Mackinac Island is ranked 5th of 1091 cities in Visitors Centers per capita.”²¹ Based on data from 2016, Mackinac County generates a total of 219.98 million dollars of revenue from visitor spending.²² Of this, roughly 25% or 54.51 million dollars of that spending is on the recreation sector, which includes visits to cultural heritage sites and museums.

In Emmet County in the northwest Lower Peninsula, “the region’s diversified economy is a mix of successful retail, industrial, tourism-oriented, agricultural, building trades and health and medical professions.”²³ In addition, all of Emmet County Parks in the Straits region, including Cecil Bay, Headlands Dark Sky Park, and McGulpin Point Lighthouse, are centered on historic sites and offer cultural and heritage tourism experiences.²⁴ Data published on 2016 visitor spending indicates that 363.39 million dollars are spent annually in Emmet County²⁵. Approximately 27% or 97.99 million dollars are spent within the recreation sector.

Cheboygan County, located in the northeast Lower Peninsula, “is ranked 9th of 83 counties in Visitors Centers per capita.”²⁶ The Village of Mackinaw City is located in Cheboygan County, and “Mackinaw City is ranked 4th of 1091 cities in Visitors Centers per capita.”²⁷ This tourism translated to 89.9 million dollars of visitor spending in 2016.²⁸ Of that spending, 13.14% or 11.81 million dollars were in the recreation sector.

To understand the significance of these tourism dollars to these counties, it is useful to examine the overall economic security of their residents. Like many of

²⁰ <https://www.mackinacounty.net/county-information/>

²¹ <https://www.countyoffice.org/mackinac-island-mi-visitors-center/>

²² <https://www.michigan.org/industry/researchandreports>

²³ <https://www.emmetcounty.org/connect-with-emmet/doing-business-in-emmet-county/>

²⁴ <https://www.emmetcounty.org/parks-recreation/>

²⁵ <https://www.michigan.org/industry/researchandreports>

²⁶ [Visitors Centers - Cheboygan County, MI \(Travel Guides & Tours\) \(countyoffice.org\)](#)

²⁷ [Visitors Centers - Mackinaw City, MI \(Travel Guides & Tours\) \(countyoffice.org\)](#)

²⁸ <https://www.michigan.org/industry/researchandreports>

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Michigan's northern, rural counties, Mackinac, Emmet, and Cheboygan Counties have higher poverty and unemployment rates and lower household incomes than the urban counties in the southern portion of the state.²⁹ Because these counties have relatively high economic insecurity, any action that could negatively impact the tourism economy in the region would have a profound effects on the well being of people in this region. Based on the tourism data, there is a clear relationship between cultural heritage sites and regional economic prosperity in the Straits.

D. Scope Recommendations for the DEIS:

1. Ensure that the scope is sufficient to capture direct, indirect, and cumulative impacts to cultural resources in the entire Straits watershed, as delineated in the 1-2 day and 5-10 day scopes outlined in University of Michigan 2016 report.³⁰ As a complex waterscape and landscape, the Straits are tied to social, economic, and cultural issues for many different communities. Therefore, any proposed action in the Straits should weigh the potential impact of the action within the entire region.
2. Ensure that the DEIS examines all potential impacts that could result from the proposed action to (1) terrestrial archaeological sites, (2) submerged cultural sites, (3) architectural and above-ground historic sites, and (4) TCPs and Native American sacred sites.
3. Describe in detail what measures will be made to mitigate the impacts to cultural resources.
4. Ensure that every effort is made to avoid adverse effects to the significant cultural resources in the Straits region, including exploring all reasonable project alternatives, including the No Action Alternative(s), within the DEIS. The cultural and scientific significance of archaeological sites, above-ground historic buildings and structures, and TCPs cannot be restored once they are damaged or negatively impacted.
5. Ensure that the DEIS includes a third-party analysis of the risk of a spill from the existing Line 5 dual pipeline during the proposed action and after the completion of the tunnel.
6. Identify and analyze the short-, long-term, and cumulative effects of the proposed action and risks associated with the action to traditional use of the Straits as a cultural landscape and TCP, and the ability of Tribes to exercise treaty rights.
7. Identify all Federally-recognized Tribes that may be impacted by the project.

²⁹ [Michigan - Indicators by State and County \(tradingeconomics.com\)](https://tradingeconomics.com/michigan)

³⁰ Schwab, David J. (2016) Statistical Analysis of Straits of Mackinac Line 5: Worst Case Spill Scenarios. University of Michigan, Water Center. <https://graham.umich.edu/media/pubs/Mackinac-Line-5-Worst-Case-Spill-Scenarios.pdf>

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8. Ensure that all Federally-recognized Tribes with historic treaty rights to the waters of the Great Lakes are meaningfully consulted to understand how the project may impact Tribal treaty rights.
9. Identify and analyze the short-, long-term, and cumulative effects of the proposed action and risks associated with the action to heritage tourism in the Straits and Lakes Michigan-Huron region.
10. Fully explore and assess the economic impacts to the rural communities in the Straits region if the significant economic driver of cultural and heritage tourism is impacted by the proposed action.
11. Consider the impacts of the project to a variety of stakeholders that have cultural and economic connections to the Straits region, including Federally recognized tribes, local residents (which includes an unusually high proportion of economically disadvantaged and vulnerable populations), landowners, state/national/international tourists, business owners, the State of Michigan (particularly, the Mackinac State Historic Parks Commission), local municipalities, parks and nature preserves, historical societies and friends of groups for heritage sites.
 - i. Enclosure 2 includes a table of Possible Interested Parties.

- II. Impacts of Continued Operation of Line during Tunnel Construction to Cultural Resources:** If the existing Line 5 dual pipeline is left in place during the proposed action, vibrations or other activities related to the proposed action could impact the existing dual pipeline and cause leakage or spill of oil.

In data published by the University of Michigan Water Center, hydrodynamic models were constructed to understand the trajectory and rate of spread in the event of an oil spill.³¹ Such data-informed models are instrumental for understanding the scope of the area potentially impacted by a leak from the active Line 5 dual pipeline. A multi-authored study published in 2018 by Michigan Technological University provides multidisciplinary insight into factors such as: oil dispersal, clean-up and containment, public health and safety impacts, fire and explosion risks, impacts on natural, ecological, and cultural resources, and economic damages, in the case of an oil spill in the Straits region.³² These models are the basis for our proposed scope for the consideration of cultural resources that may be impacted by this proposed action.

A. Recommendations for the DEIS:

1. Ensure that third-party analysis will be conducted to evaluate the potential for damage to the existing pipeline and potential for leakage of petroleum

³¹ Schwab, David J. (2016) Statistical Analysis of Straits of Mackinac Line 5: Worst Case Spill Scenarios. University of Michigan, Water Center. <https://graham.umich.edu/media/pubs/Mackinac-Line-5-Worst-Case-Spill-Scenarios.pdf>

³² Independent Risk Analysis for the Straits Pipelines - Final Report. (2018). https://mipetroleumpipelines.org/sites/mipetroleumpipelines.org/files/document/pdf/Straits_Independent_Risk_Analysis_Final.pdf

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products into the fresh waters of the Straits Mackinac during tunnel construction and associated activities.

2. Disclose and assess all potential impacts of the project, including a worst-case scenario spill for existing Line 5, and how such a spill would restrict the ability of Tribal citizens to exercise treaty rights.
3. Disclose and assess all potential impacts of the project, including a worst-case scenario spill from existing Line 5 during tunnel construction, to (1) terrestrial archaeological sites, (2) submerged cultural sites, (3) architectural and above-ground historic sites, and (4) TCPs and Native American sacred sites.
4. Describe what measures will be made to mitigate and remediate the impacts to cultural resources in the event of an oil leakage from the existing Line 5 dual pipeline.
5. Fully explore and assess the economic impacts to the rural communities of the Straits region in the event of a worst-case scenario spill from existing Line 5 during construction of the tunnel.

III. Impacts of Abandonment in Place to Cultural Resources: Currently, as stated in the NOI, at the completion of the proposed tunnel construction the Line 5 dual pipeline will be decommissioned and abandoned in place. As previously discussed, a large number of submerged archaeological sites are found in the Straits, some of which are very close to the existing Line 5 dual pipeline. Additionally, the Straits may be considered a Maritime Cultural Landscape (MCL). SHPO has concerns about the threat posed by the abandoned pipeline if it were to break, dislodge, or move along the lakebed. In addition, if the abandoned tunnel poses a risk of petroleum products leaking into the Straits, Tribal treaty rights may be impacted.

A. Recommendations for the DEIS:

1. Ensure a third-party study of how abandonment of the tunnel could impact cultural resources in the event of:
 - a. Leakage of any petroleum products remaining in the pipeline into the Great Lakes watershed after abandonment,
 - b. The abandoned pipeline breaking loose from the lakebed and potentially impacting underwater sites
 - c. Some combination of scenarios a) and b).
2. Disclose the financial liability of Enbridge in the event of oil leakage from the abandoned pipeline after abandonment.
3. Describe what measures will be made to mitigate and remediate the impacts to cultural resources in the event of oil leakage from the decommissioned pipeline after abandonment.
4. Disclose and assess the impact of an oil leak from the decommissioned pipeline on the ability of Tribal citizens to exercise treaty rights.

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5. Disclose and assess the impact of an oil leak from the decommissioned pipeline on the Straits as a possible MCL.
6. Explore all reasonable alternatives to abandonment in place of the decommissioned Line 5 dual pipeline, such as complete removal, burial in place with aggregate, or other alternatives.

IV. **Impacts of the Irreversible Nature of the Proposed Action:** Unlike the existing Line 5 dual pipelines, the tunnel is not removable or reversible and represents a permanent construction within Michigan bedrock. As a result, SHPO strongly urges that the possible long-term impacts of the tunnel to the Straits be considered.

A. Recommendations for the DEIS:

1. Clarify the operational lifespan of the Line 5 pipeline.
2. Clarify the operational lifespan of the proposed tunnel.
3. Ensure third-party analysis of the impacts to cultural resources in the Straits in the event of tunnel subsides or failure.
4. Ensure third-party analysis of the effectiveness of the concrete lining in the tunnel as a form of “secondary containment” in the event of a pipeline leak within the tunnel.
5. Evaluate the potential risks to cultural resources associated with explosions originating within the tunnel.
6. Ensure third-party analysis of the safety risks associated with potential utilities that may be co-located in the tunnel. Evaluate if utility co-location presents any additional risks to tunnel failure.
7. Ensure a third-party model for the potential for a leak/spill due to tunnel failure while the pipeline is operating.

V. **Impacts to Cultural Resources due to Vibrations:** It is the understanding of SHPO that tunnel boring below the waters of the Straits of Mackinac has the potential to create vibrations that could impact cultural resources long-term and create short-term disruptions to the Straits as a heritage tourism destination and possible TCP.

A. Recommendations for the DEIS:

1. Ensure third-party analysis of the potential effects of boring vibrations to terrestrial and submerged cultural resources and traditional cultural landscapes.
2. Ensure third-party research of potential adverse effects to the Mackinac Bridge, a National Historic Civil Engineering Landmark, which could result from tunneling and other activities related to the creation and/or utilization of the proposed tunnel.
3. Ensure third-party research of potential adverse effects to submerged archaeological sites and shipwrecks that could result from tunneling and activities related to the creation and/or utilization of the proposed tunnel.

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4. Ensure third-party research of the long-term impacts of vibrations to cultural resources, as it appears that the proposed boring may take several years.
5. Describe what measures will be made to mitigate the impacts of vibrations to cultural resources.

VI. **Impacts to Cultural Resources due to Noise:** Boring and other construction activities, as well as tunnel operation, will produce noise both day and night during tunnel building and utilization. Transportation related to the project will proliferate noise during the movement workers, equipment, bedrock and other fill material, and maintenance-related items and people. Ventilation fans to aerate the tunnel once operable will create constant noise during the lifespan of the tunnel. Noise could have a negative impact on nearby residents, the traditional use of cultural landscapes and ability to exercise Tribal treaty rights, the historic integrity of setting and feeling of significant historic sites, as well as heritage tourism at cultural sites.

A. Recommendations for the DEIS:

1. Ensure third-party analysis of the potential effects of noise relating from the proposed project area on nearby historic properties and cultural landscapes, particularly those that are currently actively utilized (e.g., Headlands Dark Sky Park, McGulpin Point Lighthouse, the waters of the Straits, established National Historic Landmarks, and NRHP listed or eligible sites, and local historic districts).
2. Ensure third-party analysis of traffic and noise along the transportation routes to fill disposal sites. Particular attention should be paid to where these routes intersect with NRHP eligible or listed sites, as well as established National Historic Landmarks.
3. Ensure that the planned Ethnographic study will assess how noise may impact traditional use of the Straits as a cultural landscape and possible TCP.
4. Map and disclose to all stakeholders and interested parties the decibel level of noise generated by the proposed project.
5. Describe what measures will be made to ensure the impacts from noise will be mitigated.

VII. **Impacts to Cultural Resources due to Light Pollution:** Construction activities and both temporary and permanent facilities for the proposed tunnel will be operational day and night. Because of this, light pollution is a serious concern for Headlands Dark Sky Park, which was certified as an International Dark Sky Park in 2011. Light pollution is also potentially a concern for traditional uses of the Straits of Mackinac as an apparent cultural landscape and TCP, as well as the ability to exercise Tribal treaty rights.

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A. Recommendations for the DEIS:

1. Ensure third-party analysis of light pollution viewshed and the potential effects of light pollution (during all four seasons) for the Straits of Mackinac (including both the south and north tunnel entrances).
2. Assess the light pollution impacts of temporary and permanent constructions on the International Dark Sky park as “land possessing an exceptional or distinguished quality of starry nights and a nocturnal environment that is specifically protected for its scientific, natural, educational, cultural heritage, and/or public enjoyment.”³³
3. Ensure that the planned Ethnographic study will assess how light pollution may impact traditional use of the Straits as an apparent cultural landscape and TCP.
 - a. Assess the effect that industrial light during nighttime hours on culturally important plants that grow within and around the construction areas.
4. Describe what measures will be made to ensure the impacts from light pollution will be mitigated.

VIII. Impacts to Cultural Resources due to Sediment Disposal: The amount of rock and bedrock to be removed from the proposed 3.6 mile long, 21 feet in diameter tunnel is estimated as 364,000 cubic yards. Due to the substantial amount of fill to be discarded, SHPO recommends that offsite disposal locations be evaluated for potential impacts to cultural resources. Even existing quarries or previously disturbed areas should be investigated, unless it can be determined that they were surveyed within the last decade. Many older quarries pre-date the National Historic Preservation Act or National Environmental Policy Act and are unlikely to have been previously surveyed.

A. Recommendations for the DEIS:

1. Ensure that Cultural Resource Surveys are conducted for all the disposal sites and transportation routes.
2. Consider that the disposal sites, if they are quarries or industrial locations that are over 50 years old could be NRHP eligible sites.
3. Address who “owns” the bedrock and material removed for the tunnel from Michigan bottomlands.
4. Ensure that a visual impact and viewshed analysis is conducted of the materials proposed to be deposited at disposal sites.

IX. Impacts to Cultural Resources due to Discharge: The proposed action includes the discharge of dredged or fill material into the fresh waters of the Straits and the installation of a discharge pipe. The NOI also mentions water treatment facilities, but it does not describe how these facilities would be utilized and how water will be treated. Cultural

³³ <https://www.darksky.org/our-work/conservation/idsp/parks/>

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resources that could potentially be impacted by discharge into the waters of the Straits include submerged sites, near-shore terrestrial archaeological sites and historic structures, and traditional indigenous food resources connected to the Straits of Mackinac watershed.

A. Recommendations for the DEIS:

1. Describe how discharged water will be treated and what chemicals will be used.
2. Disclose if there are environmental contaminants or risks associated with discharge.
3. Ensure that third-party studies will be conducted to address whether discharge could impact to cultural resources, both in the short- and the long-term.
4. Specify whether the planned Ethnographic study will assess discharge for impacts to Indigenous resources protected by treaty rights, such as water, fish, animals, and plants.
5. Describe what measures will be made to ensure the impacts from discharge on cultural resources will be mitigated.
6. Describe what measures will be made to ensure the impacts from discharge on Indigenous resources protected by treaty rights will be mitigated.

- X. **Impacts to Indigenous Treaty Rights and Cultural Resources due to Disturbance and Infilling of Wetlands:** The proposed action involves disturbance and infilling to wetlands that are home to plant species that have cultural and traditional uses to Native American communities who consider the Straits their ancestral homeland. Wetland disturbance may impact the ability of Native Americans to exercise Tribal treaty rights.

A. Recommendations for the DEIS:

1. Clarify the origin of the proposed fill placed in wetlands. If fill is coming from offsite, then ensure this location is evaluated for cultural resources.
2. Discuss how fill will be removed after the tunnel is completed.
3. Discuss how wetlands will be restored. Clarify the success or failure rate of wetland restoration.
4. Ensure third-party study of:
 - a. Which traditional indigenous plants will be impacted by the proposed action,
 - b. Ethnographic study of how wetland disturbance could impact Indigenous traditional use of plants during and after the proposed action.
5. Ensure long-term monitoring of restored wetlands.

- XI. **Comments on Alternatives & Need:** While no alternatives were proposed in the NOI, SHPO is aware of a 2018 Enbridge Report to the State of Michigan titled *Alternatives for*

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replacing Enbridge's dual Line 5 pipelines crossing the Straits of Mackinac.³⁴ In this document, the three alternatives proposed all still involved some form of pipeline crossing in the Straits region. SHPO recommends that additional alternatives should be considered, including a no action alternative to the proposed tunnel. The NOI also lacked any data supporting the purpose and need of the proposed project.

A. Recommendations for the DEIS:

1. Ensure that all reasonable project alternatives are explored and documented, including alternative routes within the existing Lakehead system.³⁵
2. Examine the environmental impact of all reasonable project alternatives.
3. Clarify the purpose and need of the proposed action within the foreseeable lifetime of Line 5.
4. Verify and describe the short- and long-term economic viability of Line 5 to transport petroleum products.
5. Ensure a third-party assessment of the purpose and need of the tunnel weighed against potential long-term impacts during the operational life of the tunnel.

³⁴ Enbridge, Report to the State of Michigan Alternatives for replacing Enbridge's dual Line 5 pipelines crossing the Straits of Mackinac, June 15, 2018. [Alternatives for replacing Enbridge's dual Line 5 pipelines crossing the Straits of Mackinac \(michigan.gov\)](http://www.michigan.gov/alternatives-for-replacing-enbridge-s-dual-line-5-pipelines-crossing-the-straits-of-mackinac)

³⁵ https://www.phmsa.dot.gov/sites/phmsa.dot.gov/files/docs/Lakehead_system.pdf

Enclosure 2: Possible Interested Parties

Organization	Address	Telephone	Email Address	Website
Association for Great Lakes Maritime History	P.O. Box 260018, Madison, WI 53726-0018	n/a	n/a	https://www.aglmh.net/
Bay Mills Indian Community	12140 West Lakeshore Dr., Brimley, MI 49715	(906) 248-8759	paulacarrick@baymills.org (Paula Carrick, THPO)	https://www.baymills.org/
Beaver Island Marina	25860 Main St, Beaver Island, MI 49782	(231) 448-2300	n/a	n/a
Bois Blanc Island Historical Society	1144-1246 Superior Ave, Pointe Aux Pins, MI 49775	(231) 6347025	n/a	n/a
Bois Blanc Township Marina	Unnamed Road, Pointe Aux Pins, MI 49775	(231) 634-7354	n/a	http://www.mcgi.state.mi.us/mrbis/HarborDetail.aspx?sid=A-49-205
Boyne City Local Historic District/Main Street Program	319 Lake Street, Boyne City, MI 49712	(231) 582-6597	mainstreet@boynecity.com	http://www.cityofboynecity.com/main-street-program-38/
Coast Guard Chapel	914 E Huron Dr, Bois Blanc Island, MI 49775	(231) 634-7121	n/a	http://www.bbicf.org/
Cheboygan County Marina	1080 N. Huron St., P.O. Box 70, Cheboygan, MI 49721	(231) 627-4944	marina@cheboygancounty.net	https://www.cheboygancounty.net/departments-services/marina/
Cheboygan County Parks and Recreation	400 Cleveland Ave. Cheboygan, MI 49721	(231) 627-2151	n/a	https://www.cheboygan.org/departments/parks-and-recreation/
Cheboygan Main Street Program, City of Cheboygan	403 North Huron Street, Cheboygan, MI 49721	(231) 627-9931	pschneider@cheboygan.org	n/a
City of Charlevoix DDA Historic District Commission	210 State Street, Charlevoix, MI 49720	(231) 547-3257	lindseyd@charlevoixmi.gov; cityofcharlevoix.org	n/a
City of Mackinac Island, Historic District Commission	7358 Market St., PO Box 455, Mackinac Island, MI 49757	(906) 847-6190	n/a	https://www.cityofmi.org/historic-district-commission-18/
Conference on Michigan Archaeology	n/a	n/a	secretary@miarchconference.org	https://www.miarchconference.org
County Road Association of Michigan	101 S Washington Square Unit 200, Lansing, MI 48933	(517) 482-1189	info@micountyroads.org	https://www.micountyroads.org/
East Dock, LLC	6397 Main St., PO Box 220, Mackinac Island, MI 49757	(906) 430-0095	Veronica@EastDockLLC.com	https://www.eastdockllc.com/contact
Emmet County Parks and Recreation	200 Division St. Petoskey, MI 49770	(231) 330-1055	ryan.bauman@emmetcounty.org	https://www.emmetcounty.org/parks-recreation/
Friends of the Mackinac Bridge	n/a	n/a	n/a	https://www.facebook.com/friendsofmackinacbridge/
Grand Traverse Band of Ottawa & Chippewa Indians	2605 N. West Bay Shore Dr., Peshawbestown, MI 49862	(231) 534-7758	Sammie.dyal@gtbindians.com (Sammie McClellan-Dyal, SHPO)	http://www.gtbindians.org

Enclosure 2: Possible Interested Parties

Organization	Address	Telephone	Email Address	Website
Grand Traverse Regional Land Conservancy	3860 N Long Lake Rd Ste D, Traverse City, MI 49684	(231) 929-7911	info@gtrlc.org	https://www.gtrlc.org/
Great Lakes Historical Society/National Museum of the Great Lakes	1701 Front St., Toledo, OH 43605	(419) 214-5000	n/a	https://www.nmgl.org/great-lakes-historical-society/
Great Lakes Lighthouse Keepers Association	707 N Huron Ave, Mackinaw City, MI 49701	(231) 436-5580	info@gllka.org	https://www.gllka.org/
Groundwork Center for Resilient Communities	148 E Front St # 301, Traverse City, MI 49684	(231) 941-6584	info@groundworkcenter.org	https://www.groundworkcenter.org/
Hannahville Indian Community	N14911 Hannahville B-1 Rd., Wilson, Mi 49896	(906) 723-2272	csagataw@hicservices.org (Cory Sagataw)	https://www.hannahville.net/
Hathaway Family's Regina Caeli Nature Preserve	1263-1277 W Central Ave, Mackinaw City, MI 49701	(231) 347-0991	ltc@landtrust.org	https://www.landtrust.org/
Headlands International Dark Sky Park	15675 Headlands Rd, Mackinaw City, MI 49701	(231) 427-1001	headlands@emmetcounty.org	https://www.midarkskypark.org/
Hessel/Clark Township Marina	S Hessel Point Rd, Cedarville, MI 49719	(906) 484-3917	n/a	http://www.clarktpw.org/SERVICES/HesselMarina.aspx
Historic Mission Church	6670 Lake Shore Dr, Mackinac Island, MI 49757	(906) 847-3328	n/a	https://www.mackinacparks.com/more-info/weddings/historic-mission-church/
Iron and Steel Preservation	n/a	(517) 614-9868	vernmesler@earthlink.net	n/a
Keweenaw Bay Indian Community of the Lake Superior Band of Chippewa Indians	16429 Bear Town Rd, Baraga, MI 49908	(906) 353-6623	aconnor@kbic-nsn.gov (Alden Connor, THPO)	https://www.kbic-nsn.gov
Lac Vieux Desert Band of Lake Superior Chippewa Indians	P.O. Box 249, Watersmeet, MI 49969	(906) 358-0137	aliina.shively@lvd-nsn.gov (Alina Shively, THPO)	https://www.lvd-nsn.gov
Little River Band of Ottawa Indians	2608 Government Center Dr. Manistee, MI 49660	(231) 398-6893	jsam@lrboi-nsn.gov (Jonnie "Jay" Sam II)	https://www.lrboi-nsn.gov
Little Stone Church	1590 Cadotte Ave, Mackinac Island, MI 49757	(906) 847-3877	n/a	http://www.littlestonechurch.com/
Little Traverse Bay Band of Odawa Indians	7500 Odawa Cir., Harbor Springs, MI 49740	(231) 242-1408	Mwiatrolik@LTBBODAWA-NSN.GOV (Melissa Wiatrolik, THPO)	https://www.ltbodawa-nsn.gov
Little Traverse Land Conservancy	3264 Powell Rd, Harbor Springs, MI 49740	(231) 347-0991	ltc@landtrust.org	https://www.landtrust.org/
Mackinac Bridge Authority	N 415 I-75 St Ignace, MI 49781	(906) 643-7600	n/a	https://www.mackinacbridge.org/

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Organization	Address	Telephone	Email Address	Website
Mackinac Island Bible Church	6688 Main St, Mackinac Island, MI 49757	(906) 847-0217	info@mibc.org	https://www.mibc.org/
Mackinac Island State Parks	P.O. Box 873 / 207 W. Sinclair, Mackinaw City, MI 49701	(231) 436-4100	n/a	https://www.mackinacparks.com/more-info/contact-mshp/
Mackinac Island Tourism Bureau	7274 Main St, Mackinac Island, MI 49757	(906) 847-3783	n/a	https://www.mackinacisland.org/
Mackinac Island Yacht Club	7006 Main Street, Mackinac Island, MI 49757	(906) 847-3363	staff@miyachtclub.com	http://www.miyachtclub.com/
Mackinaw Area Historical Society Heritage Village	1425 W Central Ave, Mackinaw City, MI 49701	(812) 797-6000	n/a	https://www.mackinawhistory.org/
Mackinaw City Chamber of Commerce	707 N Huron Ave, Mackinaw City, MI 49701	(231) 436-5574	info@mackinawchamber.com	https://www.mackinawchamber.com/
Mackinaw City Municipal Marina	107 S Huron Ave, Mackinaw City, MI 49701	(231) 436-5269	cwest@mackinawcity.org	https://www.mackinawmarina.com/
Mackinaw Shores Association	3925 Pointe Dr, Carp Lake, MI 49718	(586) 372-7039	mackinawshore@gmail.com	http://www.mackinawshores.org/
Match-E-Be-Nash-She-Wish Band of Pottawatomi Indians (Gun Lake Tribe)	2872 mission Dr., Shelbyville, MI 49344	(269) 397-1780	Lakota.Hobia@glt.nsn.gov; Mbpi.thpo@glt.nsn.gov (Lakota Hobia, THPO)	https://www.itcmi.org/home/tribes/match-e-be-nash-she-wish-band-of-pottawatomi-indians/
McGulpin Point Lighthouse	500 Headlands Road, Mackinaw City, MI 49701	(231) 436-5860	info@emmetcounty.org	https://www.mcgulpinpoint.org/
Michigan Anishinaabek Cultural Preservation and Repatriation Alliance (MACPRA)	n/a	n/a	WJohnson@sagchip.org	n/a
Michigan Archaeological Society	n/a	n/a	maspresident@micharch.org	https://www.miarch.org
Michigan Historic Preservation Network	313 E Grand River Ave, Lansing, MI 48906	(517) 371-8080	public_relations@mhpn.org	https://www.mhpn.org/
Michigan Lighthouse Alliance	n/a	n/a	info@michiganlighthousealliance.org	https://www.michiganlighthousealliance.org/
Michigan Sea Grant	400 North Ingalls, Suite G241, Ann Arbor, MI 48109	(517) 353-9748	miseagrant@umich.edu	https://www.michiganseagrant.org;
Midwest Archaeological Conference	n/a	n/a	Brashlerj@mac.com; mschurr@nd.edu	https://www.midwestarchaeology.org/
Nottawseppi Huron Band of the Potawatomi	1301 T Drive S, Fulton, MI 49052	(269) 704-8347	Douglas.Taylor@nhbp-nsn.gov (Douglas Taylor, THPO)	https://www.nhbp-nsn.gov

Enclosure 2: Possible Interested Parties

Organization	Address	Telephone	Email Address	Website
Pokagon Band of Potawatomi Indians	59291 Indian Lake Road/P.O. Box 180, Dowagiac, MI 49047	(269) 462-4316	Matthew.Bussler@pokagonband-nsn.gov (Matthew Bussler, THPO)	https://www.pokagonband-nsn.gov/
Round Island Lighthouse Preservation Society	P.O. Box 6363, Saginaw, M 48608-6363	n/a	mroundislandlighthousemi@gmail.com	http://www.roundislandlightmichigan.com
Saginaw Chippewa Indian Tribe of Michigan	Ziibwing Center of Anishinabe Culture & Lifeways, 6650 East Broadway, Mt. Pleasant, MI 48858	(989) 775-4751	mlhadden@sagchi.org (Marcella Hadden, THPO)	https://www.sagchip.org
Sainte Anne's Catholic Church, Mackinac Island	Main St, Mackinac Island, MI 49757	(906) 847-3507	steannes@gmail.com	http://www.steanneschurch.org/
Sault Ste. Marie Tribe of Chippewa Indians	2 Ice Circle Chi Mukwa, Sault Ste. Marie, MI 49783	(906) 635-6050	mrichards@saulttribe.net (Marie R. Richards)	https://www.saulttribe.com/
Sierra Club Canada, Ontario Chapter	PO Box 2007 STN B, Ottawa, ON K1P 5W3	(613) 241-4611	info@sierraclub.ca	https://www.sierraclub.ca/en/ontario
Sierra Club, Michigan Chapter	109 E César E. Chávez Ave, Lansing, MI 48906	(517) 484-2372	information@sierraclub.org	https://www.sierraclub.org/michigan
Sierra Club, Wisconsin Chapter	754 Williamson St, Madison, WI 53703	(608) 256-0565	wisconsin.chapter@sierraclub.org	https://www.sierraclub.org/wisconsin
Society for American Archaeology	1990 K St NW, Suite 401, Washington DC 20006	n/a	oona_f_schmid@saa.org	https://www.saa.org
Society for Historic Archaeology	13017 Wisteria Drive #395, Germantown, MD 20874	(301) 972-9684	hq@sha.org	https://www.sha.org/
Society for Industrial Archeology	1400 Townsend Drive, Houghton, MI 49931-1295	(906) 487-1889	sia@siahq.org	https://www.sia-web.org/
St Ignace United Methodist Church	615 US-2 W, St Ignace, MI 49781	(906) 643-8088	stignaceumc@gmail.com	https://www.stignaceumc.wixsite.com/stignaceumc
St. Ignace Marina	6 Spring Street, Suite 100, St. Ignace, MI 49781	(906) 643-6950	info@stignace.com	https://www.stignace.com/
The Center for Michigan	221 W. Michigan Ave., Ypsilanti MI, 48197	(734) 769-4625	jbebow@centerformichigan.org	https://www.bridgemi.com/center-michigan
Tip of the Mitt Watershed Council	426 Bay Street, Petoskey, MI 49770	(231) 347-1181	info@watershedcouncil.org	https://www.watershedcouncil.org/
University of Michigan Water Center, Graham Sustainability Institute	625 E Liberty St, Suite 300, Ann Arbor, MI 48104	(734) 615-8230	graham-water-center@umich.edu	https://www.graham.umich.edu/water

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Organization	Address	Telephone	Email Address	Website
US Coast Guard, Sector Sault Sainte Marie	337 E Water St, Sault Ste. Marie, MI 49783	(216) 902-6117	n/a	https://www.uscg.mil
US Forest Service (Owners of Round Island Lighthouse)	820 Rains Drive, Gladstone MI 49837	(906) 428-5800	n/a	https://www.fs.usda.gov/recarea/hiawatha/recarea/?recid=18196
White Shoal Light Historic Preservation Society	4066 Coors Drive, Traverse City, MI 49684	(989) 205-0123	preservewhiteshoal@gmail.com	https://www.preservewhiteshoal.org/