



January 26, 2017

Mr. Gib Owen, Water Resources Policy and Legislation  
Office of the Assistant Secretary of the Army for Civil Works  
Washington, DC  
E-mail: gib.a.owen.civ@mail.mil

**RE: NOI Comment from USHRN on the Dakota Access Pipeline Crossing**

Mr. Owen,

US Human Rights Network (USHRN) is a network of over 300 organizational members that builds and strengthens a human rights movement in the U.S., centered on those most directly affected by human rights violations. USHRN convenes a [National Coalition on the Human Rights to Water and Sanitation that comprised](#) of over 140 groups and individuals working on the human rights to clean water and sanitation throughout the United States.

USHRN opposes the permit for the Dakota Access Pipeline (DAPL) crossing and supports a full Environmental Impact Statement (EIS) that includes damages to the climate from the proposed pipeline project.

DAPL violates domestic and international Treaty Law. Approving such a project would be in violation of human rights law and domestic laws that USACE are required to consider. USHRN is concerned about the vast and dire consequences that potential leaks at the proposed Lake Oahe crossing will have on the Standing Rock Sioux Tribe's treaty rights, the human right to clean water and the global climate crisis. We urge the Army Corps to look at routing alternatives and fully evaluate the true costs of pipelines on communities, water sources and the global climate.

DAPL's contribution to climate change is not zero and must be quantitatively evaluated. Carbon increases to the atmosphere from this project have not been evaluated in accordance with federal law. USACE cannot issue any water permit without counting the carbon impact and thus the degree of DAPL's threat to national security. Increased carbon in the earth's atmosphere accelerates the global climate crisis and USSOUTHCOM has stated that climate change will continue to cause National Security issues.

This federal action impacts the global climate crisis and connects to the Bayou Bridge Pipeline (New Orleans District), which proposes to take Bakken light crude oil to St James Parish, in some of the largest impacts to wetlands and waters ever seen proposed. Climate change worsened flooding in Louisiana in 2016, adding 10% to a rain storm which led to the destruction of over 100,000 homes, displacement of tens of thousands of US citizens, and over \$10 billion in damages, one of the largest single disasters in the USA in years.

We ask that you deny this permit in the interest of adhering to US law and preserving human rights in the United States.

Respectfully,

A handwritten signature in blue ink that reads "Colette Pichon Battle". The signature is written in a cursive, flowing style.

Colette Pichon Battle, Esq.  
Executive Director  
US Human Rights Network