



SCHOLARS
STRATEGY NETWORK

Nationwide Permit 12

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Thank you for the opportunity to comment on the formal review of Nationwide Permit (NWP) 12. As a professor at the Nelson Institute for Environmental Studies at the University of Wisconsin Madison, I am a social scientist whose research focuses on environmental governance, particularly industrial expansion including oil and gas pipelines. My graduate students and I have ongoing research projects on the U.S. Army Corps of Engineers (USACE) permitting processes for the Dakota Access Pipeline (DAPL), and our research shows that Tribes' environmental and social concerns are often negated or overlooked. Approximately 200 water body crossings for DAPL's construction were authorized under

NWP 12. NWP 12 allows minimal evaluation of the potential repercussions of pipeline construction. Because of the potential for severe environmental damage from an oil or gas leak, and for the destruction of sacred sites all along a pipeline's pathway, pipeline constructions should be evaluated under the **standard individual permit** process, including thorough and careful **Tribal consultation** on potential effects of the **entire pipeline**.