

**Alliance for Climate Protection • Audubon Nebraska • Big Thicket Association
Bold Nebraska • Calumet Project • Center for Biological Diversity
Center for International Environmental Law • Chesapeake Climate Action Network
Clean Air & Water, Inc. • Corporate Ethics International • Dakota Resource Council
Dakota Rural Action • Earthjustice • Environment America
Environmental Defence Canada • Friends of the Earth • Global Community Monitor
Golden Triangle Group Sierra Club • Greenpeace USA • Honor the Earth
League of Conservation Voters • Lincoln 350.org • Natural Resources Defense Council
Nebraska Farmers Union • Nebraska Green Party • Nebraskans for Peace
Public Citizen Texas • Rainforest Action Network • Safe Climate Campaign • Sierra Club
Southern Alliance for Clean Energy • Stop Tarsands Oil Pipelines
US Climate Action Network • Western Organization of Resource Councils**

Tuesday, May 24, 2011

Dear Administrator Jackson,

Thank you for your personal engagement and the involvement of the Environmental Protection Agency in the environmental review of the Keystone XL tar sands pipeline. We are pleased that the State Department agreed to issue a Supplemental Draft Environmental Impact Statement (SDEIS), but we have significant concerns about the inadequacy of the analysis undertaken and conclusions drawn in this SDEIS. We ask for your continued support in holding the State Department to a thorough assessment of the environmental impacts of the proposed Keystone XL tar sands pipeline.

In the Agency's comment letter of July 16, 2010, the EPA asked that the State Department assess in greater detail the need for the pipeline and alternatives to deepening our dependence on tar sands oil, the impact of the pipeline on upstream production of greenhouse gases, pipeline safety and spill response, pipeline routing and impacts on groundwater, wetlands, and migratory birds, and impacts of the project on minority and low income communities. Because it gives superficial treatment to or dismisses the issues mentioned above, we believe that the EPA has little choice but to issue a Category 3 rating to this SDEIS and ask that a new SDEIS be generated.

In spite of the Ensys analysis, contracted by the Department of Energy and included in the SDEIS, which found there is sufficient pipeline capacity for years to come, the SDEIS still argues there is a need for the pipeline. Despite the ICF analysis, contracted by the State Department and included in the SDEIS, which finds that tar sands oil has higher lifecycle greenhouse gas emissions than other sources of oil, the SDEIS dismisses the integral link between the pipeline and the upstream production emissions and other environmental impacts. In spite of the many pipeline ruptures and spills in the last year, the SDEIS fails to look at pipeline safety issues related specifically to diluted bitumen pipelines. It dismisses alternative routes without looking at the shortest routes in the U.S. and it includes only minimal analysis of wetland and migratory bird impacts. Finally, it fails to consider environmental justice concerns based on the false premise the project will have no additional air quality or community impacts in the areas surrounding the refineries accepting the pipeline's oil.

We ask that the EPA request the State Department to hold field hearings in every state through which the pipeline would pass, in order to publicly present the information contained in the review and give the public a forum to voice their concern for this major project. The timeframe for public comments should be adjusted as necessary to allow these field hearings to take place with sufficient notice. Given the many issues of local concern, communities and land owners along the proposed pipeline right of way and in refinery communities deserve an opportunity to officially voice their concerns.

The U.S. does not need another tar sands pipeline or expanded tar sands imports. In fact, adding the new tar sands capacity of Keystone XL to the recently built Alberta Clipper and Keystone 1 tar sands pipelines could increase the carbon in our fuel supply by at least 2% which would effectively offset all the gains made by EPA's proposed truck rule by 2030. We can do better with clean energy and efficiency alternatives to meet our transportation needs. We appreciate your continued vigilance in protecting the American public and our environment from the significant risks posed by this massive dirty fuels pipeline proposal.

Sincerely,

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