

**Alaska Wilderness League \* Audubon \* Earthjustice \* League of Conservation Voters \*  
National Wildlife Federation \* Natural Resources Defense Council \*  
The Wilderness Society \* World Wildlife Fund**

October 3, 2012

Dear Ambassador Grappo:

We are writing to express our concern about the process that the Keystone Center is undertaking on behalf of the Pebble Partnership and to urge you to bring your participation in this effort to an end.

As you know, the Pebble Partnership, a consortium made up of Anglo American and Northern Dynasty Minerals, is planning to develop a massive open pit mine in the Bristol Bay watershed in Southwest Alaska. While the Pebble Partnership has not yet submitted mine permit applications, existing information on the size and the nature of the deposit make it clear that development of this prospect could transform the pristine system of rivers and lakes that is home to the world's largest wild salmon runs and a subsistence-based way of life for Alaskan Natives into an industrialized mining district. The potential impacts of large-scale mining operations in the watershed could be devastating, not only for the world-class salmon fishery and the thousands of Bristol Bay residents who rely on this 130 year-old commercial industry, but also for the entire ecosystem, which contains a globally significant area for waterfowl, seabirds and shorebirds and is home to two national parks, national wildlife refuges, and several state parks and critical habitat areas.

That is why we believe that the Environmental Protection Agency (EPA) took the right step in developing an ecological risk assessment of large-scale mining in the Bristol Bay watershed. That action was taken in response to the 2009 petition by the Bristol Bay Native Corporation and nine Alaska tribes that called for the agency to use its authority under the Clean Water Act to declare the watershed off-limits for waste disposal from large-scale mining. EPA's caution is particularly appropriate given the importance of the region and the continuing legacy of pollution associated with hardrock mining, which has consistently ranked at the top of the Agency's Toxics Release Inventory. In May 2012, the EPA issued its draft findings, concluding that "mining at this scale would cause the loss of spawning and rearing habitat for multiple species of anadromous and resident fish." A final assessment is expected before the end of the year.

As part of its assessment process, the EPA has provided substantial opportunity for expert and citizen input: it held multiple public hearings in Alaska and the Pacific Northwest; solicited testimony and written comments from state and local governments, Native corporations and tribes, the mining industry, commercial fishing sector, outdoor recreation and tourism business, scientists, and the public at large; and engaged a large panel of peer review experts to critique and improve the assessment. By overwhelming numbers, public commenters have endorsed the EPA assessment process, because it provides the most credible and transparent forum for a thorough scientific review. This includes the region's native corporation and tribes, Alaska's commercial fishing industry, leading scientists, and current and former state leaders from both sides of the aisle. We concur, and we are hopeful that the final EPA assessment will offer an

important comprehensive view of potential impacts that should guide decisions about protecting the region.

The Keystone Center has a long history with many conservation organizations. In the past, it has provided a respected and neutral forum for practical resolution of conflicts between interested stakeholders on important issues affecting our economy and environment. In this case, however, the separate Keystone Center process is neither necessary nor productive and has the potential for misuse by the mine proponents that are funding it. We believe the dialogue is the wrong approach given the project's unacceptable location and unavoidable risks. We value good science, as you do, to inform a dispute, resolve uncertainties, and, where possible, eliminate risks through project design changes, operational conditions, or other mitigation. In this instance, however, no amount of scientific analysis or mitigation can alter the fundamental problem that this is an inherently dangerous project in the wrong place. And we note the significant local opposition both to large-scale mining in the region and to Keystone's engagement in a dispute over a project that threatens to devastate this unique and irreplaceable watershed, contaminate their communities, and destroy their livelihood.

We appreciate the gravity and the potential difficulty of the request we are making, but we nonetheless urge Keystone to withdraw its engagement from the Pebble Project.

Although we disagree with the approach taken on the Pebble debate, we continue to appreciate Keystone's past efforts to enable dispassionate dialogue among diverse interests, and we look forward to working with Keystone on a range of other important environmental and economic issues.

Sincerely,

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