

**Citizens for Pennsylvania's Future \* Center for Biological Diversity \* Corporate Ethics International \* Dakota Rural Action \* Earthjustice \* EARTHWORKS \* Environment America \* Forest Ethics \* Friends of the Earth \* Greenpeace \* League of Conservation Voters \* Montana Audubon \* Montana Conservation Voters \* Montana Environmental Information Center \* National Wildlife Federation \* Natural Resource Defense Council \* Northern Plains Resource Council \* Oceana \* Public Citizen \* Rainforest Action Network \* Republics for Environmental Protection \* Safe Climate Campaign \* Sierra Club \* Union of Concerned Scientists \* Western Organization of Resource Councils \* World Wildlife Fund \***

April 23, 2010

The Honorable Hillary Clinton  
Secretary  
U.S. Department of State  
2201 C Street N.W.  
Washington, DC 20520

Dear Secretary Clinton:

On behalf of our millions of members and supporters, we write to you with concerns regarding TransCanada's proposed Keystone XL tar sands pipeline. The Keystone XL tar sands pipeline should not be built because it will facilitate expansion of the environmentally destructive tar sands oil and lock America into a continued dependence on this high-carbon fuel in direct conflict with the Administration's stated goals of building a clean energy economy and confronting climate change. We ask that you ensure that the full scope of environmental impacts, including the greenhouse gas emissions impacts, of tar sands oil expansion are taken into account in the assessment of this pipeline.

The CEQ draft NEPA Guidance on Consideration of the Effects of Climate Change and Greenhouse Gas Emissions has been referred to in the April 16 Department of State draft environmental impact statement (DEIS) on the Keystone XL trans-boundary tar sands pipeline. However, the draft guidance is currently going through its public comment period and it is important that the final guidance is applied to projects with high greenhouse gas emissions such as the Keystone XL tar sands pipeline. The current discussion of global warming issues in the DEIS is inadequate and the DEIS conclusion that there are minimal greenhouse gas emissions associated from the project is spurious, largely because of the lack of a life-cycle analysis. Putting the DEIS on hold until the new guidance is in place and can be applied will help ensure appropriate consideration of the greenhouse gas emissions effects of the project. To assist with this, we are also asking EPA to complete a comprehensive life-cycle assessment of greenhouse gas emissions for tar sands oil to help inform the DEIS for this pipeline.

We will be preparing detailed comments on the DEIS, but initially, we would like to ask you to do the following:

- The State Department should work closely with the White House Council on Environmental Quality (CEQ) to coordinate a high level, transparent inter-agency process for assessing the full scope of environmental and social impacts of and national interest in the Keystone XL pipeline.

- The State Department should suspend the permitting process for the Keystone XL pipeline until CEQ's draft National Environmental Policy Act (NEPA) Guidance on Consideration of the Effects of Climate Change and Greenhouse Gas Emissions is complete and has been applied to the pipeline assessment.
- The State Department should suspend the permitting process for the Keystone XL pipeline until an Environmental Protection Agency (EPA) greenhouse gas life-cycle assessment for tar sands and emissions increase in the U.S. transportation sector is completed and can be integrated into the DEIS.

The Keystone XL pipeline will carry up to 900,000 barrels per day of tar sands oil from Alberta, Canada to refineries on the U.S. Gulf Coast. It would be the third and largest recent pipeline delivering this highly carbon-intensive fuel from Canada, more than tripling U.S. imports of tar sands oil. To be filled, the pipeline will require expansion of tar sands oil production. Thus, it is important to assess not only existing greenhouse gas emissions, but projections of what the expansion of tar sands oil operations would mean in terms of all greenhouse gas emissions including those from land use change in the Boreal forest and wetlands carbon reservoir.

Additionally, it is critical to remember the impacts expanded tar sands use will have on the people working and living in and around the mining operations and refineries. First Nations communities living downstream from the tar sands have reported polluted water and wildlife and distressingly high rates of cancer. Tar sands also create environmental justice issues in the U.S. because the heavier oil leads to higher levels of refining pollution that are typically born by lower-income communities working and living near the tar sands refineries.

Increasing our nation's reliance on tar sands oil will undercut initiatives to stop global warming and create the green energy and green jobs we need. If we increase our tar sands imports to 3 million barrels per day this would increase the carbon in our fuel supply by at least 3%. Such an increase in tar sands oil imports would undermine the administration's initiatives to reduce greenhouse gas emissions, such as increased CAFE standards. Tar sands directly compete with homegrown jobs in clean energy, perpetuating a reliance on antiquated, dirty fossil energy, and postponing our transition to an independent energy sector. We ask that you ensure that the best information is developed and included concerning tar sands oil life-cycle greenhouse gas emissions and the other environmental and public health impacts of this tar sands oil pipeline before the permitting process moves forward any farther.

Sincerely,

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Executive Director  
Center for Biological Diversity

Trip Van Noppen  
President  
Earthjustice

Michael Marx  
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Director  
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Carter Roberts  
President & CEO  
World Wildlife Fund

Cc: Carol Browner, Assistant to the President for Energy and Climate Change  
Lisa Jackson, Administrator, Environmental Protection Agency  
Nancy Sutley, Chair, White House Council on Environmental Quality  
Elizabeth Orlando, Project Manager, Keystone XL Pipeline, Department of State