



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

September 5, 2008

John Shively  
Chief Executive Officer  
The Pebble Partnership  
3201 C Street, Suite 604  
Anchorage, Alaska 99503

Dear Mr. Shively:

This letter is in regard to a letter sent to the National Marine Fisheries Service (NMFS) from the Keystone Center dated March 5, 2008. The letter stated that the Keystone Center was contacting NMFS on behalf of the Pebble Limited Partnership (PLP) as part of the PLP's commitment to stakeholder engagement. It indicated that PLP had asked the Keystone Center to conduct an independent assessment of the issues and concerns related to the proposed Pebble Mine project. Unfortunately, due to scheduling conflicts, NMFS staff and Keystone staff have been unable to discuss our issues and concerns.

While NMFS sees value in participating in such a dialog, we request clarification regarding PLP's intentions for Keystone's assessment and its engagement with agencies such as NMFS in light of the ongoing discussions and consultations that have been held thus far.

NMFS is an active participant on the Steering Committee and on several Technical Working Groups (TWGs) established by PLP in 2007. Facilitated by the Alaska Department of Natural Resources, these groups were formed, "*to facilitate coordinated agency review, comment, issue clarification, and resolution regarding important environmental and project design studies for NEPA and subsequent project permitting.*" NMFS experts have suggested studies for the Pebble project and have devoted considerable time to assist the TWGs in determining the scope of studies; including geographical extent, methodologies, and means to best coordinate study efforts and monitoring protocols.

The PLP has stated its commitment to openness and to ensuring an informed public dialogue and, to that end, has recently initiated its *Pre-Permitting Environmental & Socio-Economic Data Report Series*. Thus, while a group like the Keystone Center conducting an independent assessment of the Pebble Mine project may have value for some stakeholders, the Steering Committee and the associated TWGs represent an existing opportunity for PLP to work with resource agencies in a cooperative manner. Because of this, we are not convinced that the time is ripe for stakeholders such as NMFS to participate in yet another process without clarification regarding what added value PLP anticipates will come from this assessment. Instead, NMFS recommends that the existing Steering Committee take a more active role in resolving outstanding issues related to the baseline studies. Under separate cover, we are sending you a copy of a letter we sent to the Environmental Protection Agency to request further dialog in this regard.



Thank you for your attention to this matter. Please contact Doug Limpinsel or Brian Lance of my staff at (907) 271-5006 should you wish to discuss further.

Sincerely,



Robert D. Mecum  
Acting Administrator, Alaska Region

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