



June 10, 2010

TO: Francesco Bandarin
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CC: Mr João Luiz Silva Ferreira, Chair, World Heritage Committee; dl.brazil@unesco-delegations.org
Ms. Mechtild Rossler, Chief of Section, World Heritage Centre; M.Rossler@unesco.org
Mr. Kishore Rao, Deputy Director, World Heritage Centre; K.Rao@unesco.org
Mr. Paul Dingwall, Science Advisor, The World Conservation Union; dingwall@paradise.net.nz

Dear Mr. Bandarin and colleagues:

We submit this update on behalf of the international coalition of conservation organizations from the United States and Canada that have petitioned since 2008 to have Waterton-Glacier International Peace Park added to the List of World Heritage Sites in Danger due to threats from mining and energy development.

We are very pleased that the 2009 mission of the World Heritage Committee's Advisory Bodies was instrumental in convincing British Columbia and Montana to announce plans to ban mining and energy development in the Transboundary Flathead River watershed earlier this year. This is a tremendous step forward in the ongoing efforts to conserve the Crown of the Continent ecosystem and outstanding universal values (OUVs) of the Waterton-Glacier World Heritage site. As a result, at this time, we are no longer petitioning to add Waterton-Glacier to the List of World Heritage Sites in Danger.

However, we remain concerned by the following, continuing threats to the OUVs of the World Heritage site, and have detailed our concerns in the attached addendum. In summary, we remained concerned by:

- The **permanence of the proposed measures in the Flathead Memorandum of Understanding** (MOU) between British Columbia and Montana of February 2010. At this time, there is no binding international agreement between the state parties at the federal level; as such, either party may revoke commitments in the BC/MT MOU unilaterally, at any time.
- **Insufficient monitoring and reporting by the states parties** of continuing threats to the World Heritage Site, as explicitly requested by the World Heritage Committee Decision 33COM 7B.22 paragraph 12. The decision requests the states parties to report on developments in the broader **Crown of the Continent ecosystem**. The State of Conservation report submitted by the states parties on April 1, 2010 failed to report on many industrial developments in the ecosystem, including:
 - Large **clearcut logging** operations with extensive road building in the British Columbia Flathead River Valley and Alberta's Castle Wilderness Area, slated to begin this summer.

- Specific exemption in the MOU that allows for **decorative rock quarrying** throughout the Flathead Watershed.
- **Increased motorized access** on roads adjacent to the World Heritage site in the proposed national park expansion area in the southeastern 1/3 of the Canadian Flathead on roads previously closed to protect environmental values.
- Threats to ecological connectivity between Waterton-Glacier WHS and the Canadian Rocky Mountain WHS with **vast expansions of open-pit coal mining** in the Elk Valley; included are a proposal for two new open-pit mines submitted to the BC Environmental Assessment Office in August 2009, and the expansion of an existing mine by 650 hectares that will not be required to undergo an environmental assessment.
- Issuing of permits for **coalbed methane exploration** in March, 2010 to BP for its Mist Mountain project in the Elk Valley.
- New and continuing **coal exploration** programs at Bingay Creek, Maarten-Wheeler Ridge and Coal Creek in the Elk Valley.
- Planned **expansion of the Spoklie Gravel Pit**, half a kilometer from the southern boundary of Glacier National Park. in the United States.
- The drilling of eight **new oil exploration** wells by Newfield Production Company on the Blackfeet Nation Reservation adjacent to Glacier National Park in the United States.
- Potential **upgrading of road access** to the United States portion of the Transboundary Flathead River Valley adjacent to the western boundary of Glacier National Park.
- Ongoing **concerns with long-term viability of regional grizzly bear populations**, as demonstrated by a recent decision by the Province of Alberta to join Montana in listing grizzlies as an endangered species, while BC continues to allow for recreational and commercial bear hunting in the region.

In light of the above-mentioned threats, we urge the 34th Session of the World Heritage Committee to request that the states parties take the following actions to ensure the long-term protection of the site's OUVs and ecological connectivity:

- Implement a **formal, binding international agreement at the federal level that permanently protects the Transboundary Flathead River Valley** from mining and oil and gas extraction and provides the framework for the development of a joint watershed conservation plan for the region, as recommended by the International Joint Commission in 1988 under the bilateral Boundary Waters Treaty.
- In conjunction with the second periodic review of North American World Heritage sites, submit revised statements of Outstanding Universal Values that:
 - Adhere to WHC Operational Guideline Para. 155 and specifically identify the requirements for protection and management in force.
 - Include all substantive management recommendations and findings from the 2009 WHC monitoring mission conducted under WHC Operational Guideline Para. 172 and requested by WHC Decision 33 COM 7B.22.
 - Provide management and protection requirements and specific long-term expectations for maintaining OUVs in the context of sustaining habitat and wildlife migration connectivity between Waterton-Glacier and the Canadian Rocky Mountain Parks WHS and throughout the greater Crown of the Continent ecosystem.

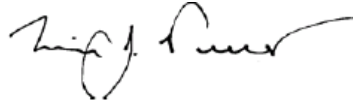
- Require **enhanced reporting on activities/threats** in the greater Crown of the Continent Ecosystem that includes a mechanism for ongoing assessments of accuracy by the WHC.

Thank you for the opportunity to provide these comments. Please refer to the attached addendum for additional details.

Sincerely,



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On Behalf of:

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Dogwood Initiative
Flathead Coalition
Forest Ethics

Headwaters Montana
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Wilderness Society
Wildsight
Yellowstone to Yukon
Conservation Initiative