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June 19th, 2018

RE: Coastal Plain Oil and Gas Leasing Program Environmental Impact Statement (EIS)

Dear Ms. Hayes:

American Whitewater submits the following scoping comments on the Coastal Plain Oil and Gas Leasing Program Environmental Impact Statement (EIS). We understand that this environmental review will also inform post-lease activities, including seismic and drilling exploration, development, and transportation of oil and gas in and from the Coastal Plain; it will further consider and analyze the potential environmental impacts of various leasing alternatives, including the areas to offer for sale, and the terms and conditions (i.e., lease stipulations and best management practices) to be applied to leases and associated oil and gas activities to properly balance oil and gas development with existing uses and conservation of surface resources, and to limit the footprint of production and support facilities on Federal lands to no more than 2,000 surface acres.

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954 with approximately 6000 members and 100 local-based affiliate clubs, representing whitewater enthusiasts across the nation. American Whitewater's mission is to conserve and restore America's whitewater resources and to enhance opportunities to enjoy them safely. As a conservation-oriented paddling organization, American Whitewater has an interest in the ecological health and recreational value of rivers that flow through the Arctic National Wildlife Refuge including the Coastal Plain.<sup>1</sup> Our members engage in opportunities for backcountry river-based recreation within the Coastal Plain through kayaking, packrafting, and rafting.

We respond to questions posed in the scoping materials below:

*What are your specific concerns about a resource – and why?*

The Arctic National Wildlife Refuge, and specifically the Coastal Plain, is one of the last truly wild landscapes in the United States. Oil and gas development activities that impact the unique visual and aesthetic values of the landscape and opportunities for an

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<sup>1</sup> As defined in Section 20001(a)(1) of the Tax Act of 115th Congress, "The term "Coastal Plain" means the area identified as the 1002 Area on the plates prepared by the United States Geological Survey entitled "ANWR Map – Plate 1" and "ANWR Map – Plate 2", dated October 24, 2017, and on file with the United States Geological Survey and the Office of the Solicitor of the Department of the Interior.

unparalleled wilderness-quality backcountry recreation experience—that includes unique wildlife-viewing opportunities—are of concern to our members.

*Do you know of any geographic areas of concern for a specific resource – and why?*

The U.S. Fish and Wildlife Service identified the following rivers, and their associated outstandingly remarkable values, as eligible for designation under the Wild and Scenic Rivers Act: Canning River (wildlife, fish, cultural), Hulahula River (recreational and cultural), Okpilak River (scenic, geologic), and Jago River (wildlife).<sup>2</sup> Of these rivers, the Hulahula was recommended for designation under the Wild and Scenic Rivers Act in the Record of Decision for the Revised Comprehensive Conservation Plan Arctic National Wildlife Refuge.<sup>3</sup>

The wildlife value of the Canning River was the highest among rivers in the Coastal Plain as quantified by habitat quality and diversity of species. The river was rated high for fish value based on high relative species diversity and a large run of Dolly Varden char. The cultural value of the river was the highest among the rivers as quantified by notable occupation, cultural/subsistence importance, number of cultures, and educational/scientific.

The scenic value of the Okpilak was the highest among rivers in the Coastal Plain as quantified by diversity of view, special features, and seasonal variations. The geologic value of the river was similarly high as quantified by feature abundance, diversity, and education/scientific.

The recreational value of the Hulahula was the highest among rivers in the Coastal Plain as quantified by diversity of use, experience dimensions, access, level of use, associated opportunities, and attraction. The cultural value of the river was similarly high as quantified by notable occupation, cultural/subsistence importance, number of cultures, and educational/scientific. Based on the experiences of our members, we concur that the recreational value of the Hulahula is unique and exceptional and the wide-open unimpaired views across the Coastal Plain are a defining feature of the experience this river provides to journey through the landscape.

The wildlife value of the Jago River was the highest among rivers in the Coastal Plain as quantified by habitat quality and diversity of species.

Visual and aesthetic impacts of oil and gas development to river corridors are of significant concern to our membership. These impacts directly diminish the value of the landscape for backcountry recreation. Alternatives need to consider the impacts of oil and gas development on values that make these rivers eligible for Wild and Scenic designation and consider the impact to the unique opportunities for backcountry recreation in this landscape.

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<sup>2</sup> U.S. FISH AND WILDLIFE SERVICE WILD AND SCENIC RIVER ELIGIBILITY REPORT, ARCTIC NATIONAL WILDLIFE REFUGE, FEBRUARY 2011.

<sup>3</sup> U.S. FISH AND WILDLIFE SERVICE RECORD OF DECISION, ARCTIC NATIONAL WILDLIFE REFUGE, APRIL 3, 2015.

*Do you have any ideas for alternatives to analyze?*

We support analysis and selection of a no action alternative that fully explores the ecological, recreational, and sustainable economic benefits of the alternative. While federal legislation authorizes “up to 2,000 surface acres of Federal land on the Coastal Plain to be covered by production and support facilities (including airstrips and any area covered by gravel berms or piers for support of pipelines) during the term of the leases under the oil and gas program,”<sup>4</sup> these facilities should be removed following production to limit impacts. Complete site clean up and restoration of all surface-disturbing activities should be a condition that is analyzed. The full cost of bonded ecological restoration should be core to the economic analysis of any action alternatives.

*Give us ideas for mitigation measures or new technologies to consider in an alternative.*

Technologies that include no surface-disturbing activities within the Coastal Plain should be considered and analyzed.

*Let us know about important information available in your community.*

American Whitewater’s National Whitewater River Inventory includes information on the Hulahula<sup>5</sup> that was identified by the U.S. Fish and Wildlife Service as eligible and recommended for designation under the Wild and Scenic Rivers Act. While the Hulahula is the most well-known resource among our membership, all the rivers that flow through the landscape provide valuable opportunities for river-based recreation enjoyed by our members.

Thank you for the opportunity to provide comment on the Coastal Plain Oil and Gas Leasing Program Environmental Impact Statement (EIS).

Sincerely,



Thomas O’Keefe, PhD  
Pacific Northwest Stewardship Director

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<sup>4</sup> Section 20001(c)(3) of the Tax Act of 115th Congress

<sup>5</sup> AMERICAN WHITEWATER NATIONAL WHITEWATER RIVER INVENTORY, HULAHULA RIVER, ALASKA, GRASSER’S AIRSTRIPE TO AREY ISLAND, <[HTTPS://WWW.AMERICANWHITEWATER.ORG/CONTENT/RIVER/DETAIL/ID/2550/](https://www.americanwhitewater.org/content/river/detail/id/2550/)>