



Dear Acting Secretary Bernhardt,

Founded in 1880, the American Canoe Association (ACA) is a national nonprofit organization serving the broader paddling public by providing education related to all aspects of paddling; stewardship support to help protect paddling environments; and sanctioning of programs and events to promote paddlesport competition, exploration, and recreation.

We are writing on behalf of over 30,000 paddlesports enthusiasts across the country, whitewater kayakers, canoeists, and stand-up paddleboarders, to express great concern with the Bureau of Land Management's (BLM) stated intent to drill in the Arctic National Wildlife Refuge (Arctic Refuge). We are calling for the protection of the coastal plain of the Arctic National Wildlife Refuge, one of our nation's most iconic wilderness landscapes from oil and gas development.

The Bureau of Land Management's (BLM) Draft Environmental Impact Statement (EIS) is deficient. It does not adequately analyze how oil and gas development will impact the natural and cultural resources of the coastal plain, which includes Porcupine Caribou herd calving and post calving habitat, Polar Bear denning sites and habitat, many species of migratory birds, and the subsistence resources and cultural heritage of the Gwich'in people who are culturally and spiritually connected to these lands and resources. In addition, the EIS fails to analyze the full extent of how oil and gas development would exacerbate the impacts of climate change, which are acutely felt in the Arctic, with rates of warming twice as high as other regions of the country.

We are deeply concerned about the amount of freshwater resources, potentially one billion gallons, required to drill the over 540 wells. The cumulative impacts of water withdrawals from streams, rivers, and springs could have significant impact on wildlife resources. In addition, ice roads, pads, elevated pipelines, and gravel mines are NOT counted as part of surface disturbances, and as a result, are not considered in the 2,000-acre surface development limit.

The paddling community cherishes the resources that are protected within the Arctic Refuge. The Hulahula River is within the proposed leasing zone, and there is nothing in the EIS or leasing stipulations that requires recreational access to rivers or anywhere within the leasing area. The Hulahula is often referenced as the quintessential Arctic river trip, allowing paddlers passage through the coastal plains, and the calving grounds of the Porcupine Caribou Herd. This river has been recommended by the U.S. Fish and



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503 Sophia St. Suite 100 | Fredericksburg, Virginia 22401
Phone: (540) 907-4460 | www.americancanoe.org



Wildlife Service for permanent protections under the Wild and Scenic Rivers Act. One study found that oil and gas development would be potentially visible on 88% of the river miles that are commercially rafted in the development area, significantly diminishing the recreational value of these resources.

2018 marked the 50th anniversary of the Wild and Scenic Rivers Act, and the ACA is committed to using its voice to represent the interests of paddlers across the nation to promote the permanent protections of recreational paddling resources like the Hulahula. In addition to the Hulahula, nearby paddling resources such as the Marsh Fork of the Canning and the Kongakut may be impacted by the visual and sound impacts of oil and gas development in the coastal plain.

In sum, the EIS does not adequately provide plans to mitigate the impacts of oil and gas development. The process was compressed, and the comment period ultimately short. The development of oil and gas production in this region is incompatible with protection of the resources of the Arctic Coastal Plain. BLM states in the EIS that it will not select the no-action alternative due to the requirements of the Tax Act to hold lease sales on the Coastal Plain. It is noteworthy that all the action alternatives offer much more acreage than required by the Tax Act (400,000 for each sale). The ACA does not support any leasing in the Arctic National Wildlife Refuge. At a minimum, Congress should partially repeal the Tax Act and remove the requirement of leasing for oil and gas development in the Arctic Refuge. If this does not happen, the ACA feels that leasing alternative D2 is the best option. Alternative D2 presents the most temporally restrictive constraints for drilling, and offers the best protections for caribou calving. Alternative D2 should be amended to ensure protections for: access, wilderness character, visual resources, soundscapes, water resources and natural resources, in the stipulations and regulations.

Sincerely,

Brett Mayer
ACA | Canoe - Kayak - SUP - Raft – Rescue
bmayer@americancanoe.org
434-409-9026



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Phone: (540) 907-4460 | www.americancanoe.org



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