

November 6, 2020

Submitted via e-mail

Sarah LaMarr
Arctic District Office
Bureau of Land Management
222 University Ave.
Fairbanks, AK 99709
blm_ak_rdo_cp_2020_seismic@blm.gov

Comments re: Kaktovik Iñupiat Corporation's Application to Conduct Seismic Exploration in the Arctic National Wildlife Refuge (DOI-BLM-AK-R000-2021-0001-EA)

Dear Ms. LaMarr:

The following comments are provided on behalf of Wilderness Watch, a national conservation organization advocating for the protection and appropriate stewardship of our National Wilderness Preservation System in accordance with the Wilderness Act of 1964. We offer these comments in addition to those submitted by Trustees For Alaska on our behalf and that of many other conservation organizations. Wilderness Watch also submitted comments on August 17, 2018 regarding a proposed 3D seismic program by SAExploration. Because this KIC proposal has many similarities to the previous program, I request that our previous comments be incorporated in the administrative record for this current proposal by KIC as well. Please see the attached file for our August 17, 2018 comments.

These comments are based upon over 20 years of my field experience as a wildlife biologist at the Arctic National Wildlife Refuge from 1981 to 2002. During that time I studied caribou, especially their use of calving and post-calving habitats on the Refuge coastal plain as well as other wildlife as required under Section 1002c (baseline studies) and 1002h (report to Congress) of the Alaska National Interest Lands Conservation Act (ANILCA). This work enabled me to visit the coastal plain and other regions of the Refuge during all seasons for over 20 years. Prior to my field work in the Arctic National Wildlife Refuge, I worked for the U.S. Fish and Wildlife Service during 1976 to 1980 providing wildlife information relative to Congressional action leading up to passage of ANILCA in 1980. Much of my work at that time focused proposed ANILCA provisions dealing with the Arctic Refuge. I am familiar with the original purposes of the former Arctic National Wildlife

Range and its establishment history, as well as the ANILCA purposes for the Refuge.

Both of these proposed seismic programs have much in common in that they are highly deficient in providing key information that is necessary to properly evaluate potential impacts. The time allowed for comment in the current case, a mere 14 days, is woefully inadequate for meaningful input from the public. If an environmental assessment is in preparation, the public has not been properly informed of such preparation nor is there any indication that public review of an EA will be solicited. Given the scale of the proposed seismic program, and the specific characteristics of the targeted area and its sensitive wildlife and habitat, a full Environmental Impact Statement is necessary to comply with the National Environmental Policy Act.

This action constitutes a rush to authorize an inappropriate activity within the Arctic National Wildlife Refuge contrary to legal requirements and if allowed to continue will result in significant long lasting impacts to sensitive tundra vegetation, soils, water resources, visual qualities, wilderness character, and wildlife such as polar bears that use key habitat for maternal denning. As we emphasized and described in our 2018 comments, topography of the Refuge coastal plain is substantially more irregular and hilly than to the west where the plain is generally flat. Also, due to close proximity to the coast, there is consistently higher wind velocity which is oriented east-west. This results in extremely uneven snow cover on exposed surfaces of hilly terrain, and river bluffs. It also results in deep snow deposits in creek bottoms of the Refuge coastal plain. These conditions and potential for damage to vegetation, soils and water courses are well described in Reynolds et al. 2020. We also point out that a multi-disciplinary workshop was held recently to address these special conditions and corresponding concerns. Impacts of a much less intensive seismic reconnaissance to vegetation and soil remain nearly 40 years after as scars that blemish visual values of some portions of the Refuge coastal plain. The proposed 3D program will result in far greater impacts that may last over many decades or more.

It is the relative abundance of snow drifts along stream bottoms in the Refuge coastal plain that provides shelter and denning habitat for maternal polar bears to birth and protect their small, vulnerable cubs. For many years the coastal plain of the Refuge has been documented for its high density of denning polar bears. Now more than ever, the threatened Southern Beaufort Sea polar bear population needs this area for denning because of recent declines related to the effects of climate change. In 1985 a denning polar bear female was likely displaced prematurely due to passage of seismic vehicles near the den. The fate of the young cubs was not determined, however, the displaced female was never seen accompanied by young

after this incident. Because of the much greater intensity of 3D seismic operations, even more such incidents are likely. The use of forward looking infra-red sensing has been shown to detect about 50% of occupied dens under the best of conditions. The potential impacts to this beleaguered polar bear population from the proposed action renders it completely unacceptable.

SUMMARY

Since the beginning of time, the lands of the Arctic Refuge coastal plain have existed essentially untouched and because of their extraordinary condition and value were set aside as the Arctic National Wildlife Range and later as the Refuge. This protection came about through the work of visionary people who saw a great value in these lands as a wilderness and home for the great diversity of wildlife living there. It was to be kept as it is so that others in generations to come may see it and be inspired by its uniqueness. This sacred heritage landscape that we now call the Arctic Refuge has sustained indigenous people over untold millennia may become a sad memory if the proposed action is authorized. This seismic program must be abandoned and never considered again.



Fran Mauer/USFWS

This photo was taken on July 4, 1986 over the area that is proposed for seismic surveys by KIC. A post-calving aggregation of the Porcupine Caribou Herd estimated at over 60,000 caribou are crossing the Niguanak River. Note the hilly terrain and snow drifts that are often used for maternal polar bear dens

Sincerely,

Fran Mauer
Alaska Chapter of Wilderness Watch

Reference: Raynolds, M.K., J.C. Jorgenson, M.T. Jorgenson, M. Kanevskiy, A.K. Liljedahl, M. Nolan, M. Strum, and D.A. Walker. 2020. Landscape impacts of 3D seismic surveys in the Arctic National Wildlife Refuge. *Ecological Applications*. <https://esajournals.onlinelibrary.wiley.com/doi/full/10.1002/eap.2143>