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## [EXTERNAL] Comments to BLM's, EA for seismic surveys within the Arctic National Wildlife Refuge

1 message

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I worked for the US Fish and Wildlife Service on the staff of the Arctic Refuge as an Assistant Manager/Pilot from 1976, until 1984 participating in reconnaissance snow surveys for the seismic program that was then undertaken. For many years thereafter operated an air taxi service within the Refuge based out of Ft. Yukon.

- Having flown both over and outside of the Refuge it is obvious to even the casual observer that oil developments and seismic exploration have had profound, detrimental and long lasting impacts on the land outside the Refuge. Within the Refuge I observed a partial healing of the landscape from the seismic surveys that occurred in the mid-80's but I also saw with great sadness and regret that in those areas where snow cover was inadequate the changes to the landscape were in some cases starkly apparent and permanent. And this survey was done with five mile grid spacing and not the intensive closely spaced grids and track lines of a 3D program. The point of all this and Professor Skip Walker in his comments points this out is that in essence there is no level of disturbance from vehicular travel over the tundra despite snow cover that will not have some impact from compaction and disruption of the delicate thermal balance of the underlying permafrost. When you couple this with the variability of terrain and snow cover and based on what has happened before within and without the Refuge a ground based survey will result in major and long lasting and likely permanent scarification of this unique landscape. To conclude that a ground based seismic program will not have significant degrading impacts on what remains as a virtually pristine landscape is disingenuous and irresponsible. An EA does not measure up to the kind of analysis that an EIS would give and is inadequate.

Steel runnered sleds and dozers have been used in the past to haul camps around in support of the DEW Line in the 50's and later the seismic survey done in the 80's. Some of these rutted trails are still visible and permanent

changes to the landscape.

In other sensitive places where the impacts to the land have been judged to be severe and degrading oil companies have been compelled to conduct these surveys from the air. Studies and the experience this writer, Professor Walker and others have concluded that impacts of an intensive seismic survey of the type proposed will result in degradation of the landscape. It will in the end destroy for all time what is now a virtually pristine place and the last of its kind on the North Slope of Alaska.

An aerial seismic survey is a feasible alternative that would avoid degrading impacts. It would likely cost more in one sense but less than what taking the long view would be permanently and forever lost to future generation. Its requirement and use in this instance should be thoroughly evaluated in an EIS.

It is a sad day indeed for many of us when places like this are not given a greater value for their benefit to the human spirit instead of to someone's "bottom line."

And that brings up another point that needs to be brought to the fore and that is an evaluation of what will be lost in the long term versus what will be gained in the short run. And this analysis needs to be more than just a superficial examination of the economics using traditional models but one that takes into account the environmental services provided by a wilderness place to mankind and the wildlife that depend on it, those intangible and aesthetic values that money cannot buy but are nonetheless priceless. My impression is that there are models that do just this.

The Arctic Refuge is regarded as a sacred place by many as well as the Gwich'in who self identify as caribou people and depend on caribou for their survival both physically and psychologically. Their concerns and desires have been ignored but need to be brought to the fore in any assessment of impacts to the land, wildlife and people.

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