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**[EXTERNAL] DOI-BLM-AK-0000-2018-0002-EIS (Coastal Plain Oil and Gas Leasing EIS)**

1 message

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Drilling in the ANWR could have disastrous consequences in terms of environmental damage, disruption of wildlife populations and negative consequences for First Nations people.

In particular, the Gwich'in people rely on the Porcupine caribou herd for subsistence and will suffer considerably if this population is disrupted.

Each summer the caribou migrate to their calving grounds on the coastal plain (Area 1002) which is believed to hold high potential for successful oil drilling. The likely effect of this activity would be to reduce the number of caribou and cause them to move to less suitable areas for calving. Predictions suggest that the herd could be displaced by up to 30 miles and suffer a reduction of 8.2% in calf survival. Griffith et al (2002) suggest that a reduction of 4.6% could halt population growth so an 8% reduction would be devastating in its diminution of the herd.

When the herd were unable to reach the 1002 area due to unusually heavy snowfall the calf survival rate fell by 19% (Griffith et al, 2002, p.34). Drilling in this area is likely to have a similar effect.

In nearby Prudhoe Bay, where oil drilling occurs, the caribou of the Central Arctic herd were shown to move their calving area 4 miles away from drilling infrastructure, confirming that it caused a disturbance to the caribou (Griffith et al., 2002, p. 31). The Porcupine herd population is much larger than the Central Arctic herd and there is less nutrient rich land available in the surrounding area of the calving zone. This lack of high quality habitat, coupled with increased predation diminishes calf survival (Griffith et al., 2002, p. 34).

The Herd would likely be displaced to the south for calving ground which is composed of more foothills and mountains. The two major predators of caribou (grizzly bears and wolves) are usually more abundant, in both the foothills and mountains, where the caribou would be displaced to. A study done by Griffith et al. (2002), measured the abundances of these two predators in three habitat types, coastal plains, foothills, and mountains (p. 51). Grizzly bears were found to primarily stay in the foothills with a few wandering to the coastal plain to feed on the caribou (Griffith et al., 2002, p. 51). It was also noted that all of the active wolf dens in the area were in the mountains except for one which was found in the foothills. According to Griffith et al. (2002), there has not been a reported case of a wolf den on the coastal plains of the ANWR (p. 51). If the caribou were forced south, towards the foothills and mountains, they would be at a much higher risk of predation since both grizzly bears and wolves are at a greater density in these areas.

Another issue the caribou face is insect harassment, in particular, from mosquitoes. After calving occurs, the Herd will move towards the coast to try to seek relief from these insects (Corn, 2003, p. 59). Oil development in the 1002 area could reduce the access to these important habitats. According to Clough, Patton, and Christiansen (1987), if caribou cannot freely move to a lower density insect habitat there could be severe consequences of disease, or death, brought on by the insects (p. 122). The proposed main pipeline for the 1002 area would bisect the calving grounds causing disturbance in the center of the crucial habitat (Clough, Patton, & Christiansen, 1987, p. 98), creating a tremendous barrier for the herd; other large herds of insect-harassed caribou have been observed to not travel under pipelines and have been seen to run up to 20 miles out of their way in order to go around the pipeline rather than passing under (Clough, Patton, & Christiansen, 1987, p. 112). The end result would be a reduced use of land north of the pipeline which contains approximately 52 percent of the total insect relief habitat (Clough, Patton, & Christiansen, 1987, p. 112). To escape the insects the caribou would likely travel south towards the foothills where, as mentioned earlier, there is a much greater risk of predation.

For thousands of years, the Gwich'in or "caribou people" of the ANWR have depended on the migrating arctic porcupine caribou for food, clothing, shelter and tools. The Gwich'in culture is so "interwoven with the life-cycle of the herd" that their survival as a people is completely dependent on the caribou (Albert, P., 1994). One fundamental Gwich'in belief is that "every caribou has a bit of the human heart in them; and every human has a bit of caribou heart." Paul Josie, a member of one of the 13 Gwich'in villages, describes any "threat to the caribou is a threat to us... to our way of life" (Maher, P., 2017). Not only does the

caribou satisfy these indigenous people's spiritual needs, but the hunting and distribution of the caribou meat enhances their social interaction with other tribes in the area. The caribou has become a vital component of the indigenous people's mixed subsistence-cash economy (Maher, P., 2017).

The effect of drilling in the ANWR on the caribou and the people whose lives depend on them is just one of the many potentially disastrous consequences of this reckless proposal. This area needs to be permanently off limits to extractive industries.

Thank you for your attention.

Susan Fairweather.