
From: Hayes, Miriam (Nicole) <mnhayes@blm.gov>
Sent: Monday, March 11, 2019 8:04 AM
To: coastalplainAR; Sean Cottle
Subject: Fwd: [EXTERNAL] Comments about DEIS

Nicole Hayes

Project Coordinator
Bureau of Land Management
222 W. 7th Avenue #13
Anchorage, Alaska 99513
Desk: (907) 271-4354
Cell: (907) 290-0179

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From: **Heather Mirczak** <hmirczak@gmail.com>
Date: Sat, Mar 9, 2019 at 3:54 PM
Subject: [EXTERNAL] Comments about DEIS
To: <mnhayes@blm.gov>
Cc: <ryan@northern.org>

I am writing with concerns about the draft DEIS that I would like addressed before a final report is made. These concerns revolve around the Porcupine Caribou herd which travel through and use much of the coastal plain, specifically area 1002, as their calving grounds. It was a trip to the Arctic on the Kongakut river to see the Caribou migrate that brought me to this great state. As an Alaskan resident I use ANWR as a place for recreation and viewing wildlife. The Caribou are a large part of that resource and it is evident to me that more research and analysis need to be done on the impacts of development on the Porcupine herd.

It is known that the Porcupine Herd has a lower annual growth rate than other herds in Canada and Alaska that migrate to the coastal plain. This means that disturbances to the successful calving process could have severe impacts on herd size which they may not be able to recover from.

Caribou eat a variety of vascular plants and the coastal plain provides some of the most nutrient dense food especially for the pregnant and nursing cows. This creates better quality milk which in turn provides the greatest chance of healthy calves.

Pertaining to food quantity, Studies show that developed areas in the coastal plain have a steady decline of food for post calving caribou, compared with undeveloped areas. This means that allowing for more development (buildings, roads, drilling machinery, etc...) will encroach upon and potentially diminish the supply of nutrient dense food for calving caribou. This could negatively impact population growth and herd size.

One alternative is to limit the size of land leases to the 400,000 acre limit. More importantly is to limit the ongoing or expanded capacity of development that could accrue from the 2000 acre surface development limit that excludes ice roads, ice pads, elevated pipelines and gravel mines. Containing or limiting the amount of area for development seems important for protecting the quality and quantity of the nutrient dense food sources. Caribou have an excellent sense of

smell. They can smell lichen 2-3 feet below the snow! Excluding development of Ice roads and pads from the acreage limit does not make sense as these structures could disturb growth or prevent access to these food sources. Currently the BLM estimates that only 49% of the coastal plain is sensitive calving grounds. I question if this number includes all the caribou who may be pushed to the coastal plain due to disturbance. I would like to see more research and analysis done on this specific issue.

Another alternative is to require that all construction activities and drilling are halted during the months of the year when the caribou are calving. As currently written the most restrictive option only halts "major construction activities" - not including drilling - for a single month during caribou calving. The bare minimum I find acceptable is that ALL versions of a lease agreement include a minimum of a single month restricting all construction and drilling activities.

The development of oil on the coast will push calving closer to the Mountains. The concern from this disturbance is the increase in Bear & wolves as predators on the caribou. This links back to the limited annual growth of the herd and potential effects on population size. The coastal plain affords open space for the caribou which is better protection from predators and ample winds to abate biting insects.

At this time, identified in the EIS, we know that anything that moves the Porcupine caribou herd away from the coastal plain has been shown to be detrimental to calf survival. I do not think the BLM has adequately addressed the impacts or considered the full range of areas important to the caribou. I would like to see these issues addressed before a final report is made.

Thank you for your time,

Sincerely,

Heather Mirczak
4450 Kallenberg Rd
Ester, AK 99725