



THE WILDLIFE SOCIETY

ALASKA CHAPTER

The Alaska Chapter of the Wildlife Society strives to enhance the ability of wildlife professionals to conserve biological diversity, sustain productivity, and ensure responsible use of wildlife resources in Alaska for the benefit of society.



July 1, 2025

Carrie Cecil
Bureau of Land Management
222 West 7th Ave, #13
Anchorage, AK 99513

Re: Alaska Chapter of The Wildlife Society Comments on the National Petroleum Reserve – Alaska Draft Integrated Activity Plan Environmental Assessment

Dear Ms. Cecil,

This letter represents the Alaska Chapter of The Wildlife Society's public comments on the Draft Environmental Assessment (EA) for the National Petroleum Reserve in Alaska (NPR-A) Integrated Activity Plan (IAP). The Alaska Chapter of The Wildlife Society (TWS) is a professional society founded in 1971. With over 200 members, the Alaska Chapter is one of the largest chapters of The Wildlife Society, an international organization representing wildlife biologists and managers employed by state, federal, and borough resource agencies, academic institutions, non-governmental conservation organizations, and private industry. Our science-based mission is to enhance the ability of wildlife professionals to conserve biological diversity, sustain productivity, and ensure responsible use of wildlife resources in Alaska for the benefit of society.

We previously commented on the 2020 draft IAP Environmental Impact Statement (EIS) process, sharing a variety of scientific information about geese, caribou, and shorebirds to help inform development of the final EIS. We have reiterated some of this information below, updating it with new information relevant to the Draft EA.

We strongly encourage the Bureau of Land Management (BLM) to recognize the importance of balancing future development in America's Arctic with conservation measures to safeguard the outstanding wildlife and habitat in the region. Arctic ecosystems are particularly susceptible to disturbance because their biological diversity and net biological productivity are low. Climate change is placing additional stress on these systems. Wildlife populations that reside in colonies or congregate seasonally in small areas in ecosystems of the far north could be stressed not only from degradation of their habitats but also from accelerated human disturbance. Thus, development of a petroleum industry in arctic regions must be implemented carefully to avoid or minimize rapid and perhaps irreparable damage to these unique and easily disrupted ecosystems.

In addition to industrial development, climate change is rapidly altering arctic ecosystems through warming, permafrost melting, shrub expansion, and other effects (Myers-Smith et al. 2011; Post et al. 2019; Mekonnen et al. 2021; Frost et al. 2025). Research has shown that climate change and human infrastructure can have cumulative impacts leading to environmental changes (Raynolds et al. 2014; Walker et al. 2022). Together, we expect these stressors will significantly affect fish and wildlife species and their habitats in ways that will challenge people's ability to mitigate impacts. Understanding how stressors affect species and habitats individually and in combination will require areas left undeveloped to provide scientific controls for monitoring and evaluating individual and cumulative effects. Moving to a management plan that opens 82% of the NPR-A for leasing will hinder opportunities for long-term monitoring of control areas.

Insufficient Time for Commenting

We are greatly concerned with the short window provided for commenting on the Draft EA. A 14-day period is insufficient to allow adequate review, analysis, discussion, and development of public comments. We are strong advocates of using the best scientific information to guide management decisions. This is not possible when time is insufficient to review and provide such information. Previous comment periods for the draft IAP/EIS lasted 60 days. **We ask that BLM provides more time for review and commenting on future decisions.**

Special Areas

With passage of the Naval Petroleum Reserves Production Act of 1976, Congress transferred management of NPR-A to the Department of the Interior and recognized the extraordinary natural values of the NPR-A, mandating that “any exploration within the Utukok River and Teshekpuk Lake areas and other areas designated by the Secretary containing any significant subsistence, recreational, fish and wildlife, or historical or scenic value shall be conducted in a manner which will assure the maximum protection” of such surface values. The 1976 act has guided energy development in NPR-A for more than 40 years, and it makes clear that management of NPR-A is not just a matter of maximizing energy production.

There are currently five Special Areas that have been designated: Teshekpuk Lake, Colville River, Kasegaluk Lagoon, Utukok River Uplands, and Peard Bay. Each was established to ensure maximum protection of a variety of important surface values, including wildlife species and subsistence. However, the preferred alternative in the Draft EA would eliminate the Colville River Special Area and reduce protections in the Teshekpuk Lake and Utukok River Uplands Special Areas.

The Colville River is the largest river in Arctic Alaska and the cliff habitat along its banks provides one of the most important raptor nesting areas in the world. The river corridor is used by caribou (*Rangifer tarandus*), moose (*Alces alces*), wolf (*Canis lupus*), and grizzly bear (*Ursus arctos*) while its waters contain anadromous fish including pink salmon (*Oncorhynchus gorbuscha*), chum salmon (*Oncorhynchus keta*), broad whitefish (*Coregonus nasus*), humpback whitefish (*Coregonus pidschian*), dolly varden (*Salvelinus malma*), and multiple other important subsistence species. The Colville River Special Area was established to protect raptor and passerine nesting habitats and important foraging areas for moose, grizzly bears, and wolves. Elimination of the Special Area may have detrimental effects for many species.

Teshekpuk Lake lies at the heart of one of the most productive and sensitive wetland complexes in the circumpolar Arctic. The lake is the largest in arctic Alaska and third-largest in the state. The wetland complex surrounding Teshekpuk Lake is one of the most diverse and productive in the circumpolar arctic, supporting tens of thousands of brant, greater white-fronted geese (*Anser albifrons*), Canada geese (*Branta canadensis*), and lesser snow geese (*Anser caerulescens caerulescens*) during the flightless molt period. Densities of nesting shorebirds south of the lake are among the highest documented anywhere on Alaska’s North Slope, and the area west of Teshekpuk Lake is of high importance for yellow-billed loons (*Gavia adamsii*) and tundra swans (*Cygnus columbianus*). The Teshekpuk Caribou Herd is an important subsistence resource, providing most of the caribou harvested by the North Slope communities of Atkasuk, Utqiagvik, Nuiqsut, and Wainwright. Telemetry data confirm that more than 90% of pregnant cows calve in the area south, east, and north of Teshekpuk Lake and that the area around the lake is used extensively for post-calving and insect relief habitat (Person et al. 2007; Wilson et al. 2012). There are two narrow corridors of land northwest and east of Teshekpuk Lake through which 75% or more of the bulls, cows and calves must travel one or more times in mid-summer to move between critically important insect relief and foraging areas (Person et al. 2007). The Special Area continues to be important for the herd in late summer and throughout the winter (Person et al. 2007; Fullman et al. 2021a). Allowing leasing throughout the Teshekpuk Special Area would lead to a variety of impacts on species, as further described below.

The Utukok River Uplands includes the headwaters of the Utukok, Colville, and Meade Rivers, as well as other drainages. This tundra and riparian habitat is home to high densities of caribou, wolverines (*Gulo gulo*), wolves, and grizzly bears. The area is also inhabited by moose, raptors, and anadromous fish. It contains concentrated calving and insect relief areas for the Western Arctic Caribou Herd, which is relied upon for subsistence by approximately forty villages in Western Alaska. The Utukok Uplands is considered to have the highest grizzly bear density in the entire Brooks Range and has an unusually high density of wolverines.

Species-specific Impacts

Below, we offer comments regarding impacts to geese, caribou, and shorebirds. We focus on geese (especially brant; *Branta spp.*) and caribou because those species received much attention in the development of alternatives in the IAP/EIS and because there has been a substantial amount of research conducted on geese and caribou in the NPR-A and elsewhere in Alaska, much of it involving members of our professional organization. The welfare of geese and caribou is closely associated with the well-being of local subsistence communities. Geese and caribou are critically important subsistence resources for the four communities in the NPR-A and for neighboring communities such as Pt. Hope, Pt. Lay and Anaktuvuk Pass. For awareness, we point out that subsistence users' well-being and hunting activities will be affected by differences between the alternatives; however as professional wildlife biologists, not anthropologists, we do not address these impacts in our comment letter.

Molting Brant

The IAP DEIS stated that 22% of the global population of brant uses the Teshekpuk Lake area during their molt (BLM 2019, p.3-128). During this flightless period, brant are especially sensitive to disturbance. A "Goose Molting Area" (GMA) has been defined in which brant and other molting geese receive greater protection than outside that area. Under Alternative A, the GMA is closed to leasing and as such provides adequate protection for molting brant and other species found therein. Alternative E, the preferred alternative in the Draft EA, would open the entire GMA to leasing, although portions would permit no surface occupancy within 0.5 miles of molting lakes. Past studies have clearly shown that human activity at much greater distances than this can send molting geese onto the lakes and away from their foraging/resting habitat. We previously requested BLM estimate the probability that such a scenario may result in goose population reduction rather than assuming that geese can be displaced without consequences, but this does not seem to have been conducted. There is also a concern that infrastructure in the GMA could provide a "perch" for raptors seeking to prey on geese causing geese to cease feeding/resting and to flee onto a nearby lake. As the IAP/EIS acknowledges, such disturbance may prevent geese from acquiring sufficient calories to migrate on time in the fall, with a consequent reduction in goose survival. This, too, warrants quantitative estimation.

Past studies have also shown that molting geese will flee onto lakes during aircraft overflights. Stipulation K-6 under Alternative E imposes a restriction on aircraft use in the GMA during the molting period but does not specify what these restrictions must include, providing instead one possibility. It is thus unclear what level of protection this Required Operating Procedure (ROP) will actually convey. Furthermore, the BLM may state such requirements in its conditions of use provided to lessees and permittees, but in the last 20 years has done little or nothing to monitor this type of activity. This raises concerns about enforcement and the ultimate effectiveness of such aircraft restrictions. Once again, **quantitative assessment of the probability that such flights would have population level effects on brant or other molting geese is needed.** The additive effects of these impacts on brant would likely mean that Alternative E would not provide adequate protection to prevent brant population reduction or even extirpation in the Teshekpuk Lake Special Area, which was initially designated to do just that. Such an outcome would not represent "balance" in use of the land.

Caribou

Alternative A provides protection for the core summer (i.e., calving through insect avoidance seasons) habitat of the Teshekpuk Caribou Herd (TCH), by making portions unavailable for leasing. Leasing and infrastructure restrictions in these areas will also convey protections during other seasons, as the area around Teshekpuk Lake is used by at least some of the TCH year-round (Person et al. 2007; Fullman et al. 2021a). Notably, this alternative also prohibits community transportation roads north of Teshekpuk Lake. Alternative A also maintains no leasing restrictions further south of Teshekpuk Lake compared to Alternative E. The lands south of Teshekpuk Lake are at high risk for future leasing and development, increasing the likelihood that maintaining leasing prohibitions in these areas will have tangible benefits for protection of TCH calving and other seasonal habitat.

Alternative E makes all of the TCH calving and summer range within the NPR-A available for leasing. Some of this would be subject to no surface occupancy while other areas would have controlled surface use or timing limitations. Notably, the effectiveness of such restrictions has not been evaluated, making it unclear to what degree impacts to caribou will be mitigated. A 2021 simulation study evaluated expected loss of high-quality calving habitat under the alternatives

considered in the draft IAP/EIS (Fullman et al. 2021b). The study found significant increases in habitat loss under Alternative D compared to Alternative A. Alternative E was proposed after the analyses were completed but includes comparable development restrictions in the TCH calving area and thus similar effects are expected. Notably, this study was not mentioned in the summary of new scientific studies included in the Draft EA (p.A-9). We previously recommended BLM conduct a stronger quantification of impacts of the various alternatives on caribou and other species in light of existing methods to quantify the range of potential impacts of leasing proposals while accounting for uncertainty in oil and gas development (e.g., Wilson et al. 2013). This was not done, nor is it clear whether BLM has considered studies that have since been conducted (e.g., Fullman et al. 2021b). **This remains an area where additional analysis is needed, including conducting a quantitative analysis to estimate probabilities of population level effects under each alternative.**

Alternative E maintains a core area unavailable for leasing in the Utukok River Uplands Special Area to protect part of the Western Arctic Herd (WAH) calving range, though this is greatly reduced compared to Alternative A. Notably, Alternative E opens a strip of land along the southern boundary of the Utukok River Uplands Special Area for leasing and development. Some of this is subject to no surface occupancy while other portions only have timing limitations. There is also a caveat in the no surface occupancy area to allow “essential roads and pipeline crossings.” It is unclear what will be considered “essential,” leaving uncertainty in the level of infrastructure that could be present. This area overlaps some of the area repeatedly used for calving by the WAH (Cameron et al. 2020) as well as for summer movements to access insect relief and foraging habitat (Joly and Cameron 2024). Recent research has shown caribou avoidance of infrastructure and traffic during calving, post-calving, and insect relief seasons (Johnson et al. 2020; Prichard et al. 2020; Severson et al. 2023). Studies have also shown altered behavior near roads during migration and in winter (Wilson et al. 2016; Smith and Johnson 2023; Smith et al. 2023; Boulanger et al. 2024). Development south of the area unavailable for leasing could impede the ability of pregnant female caribou to reach the calving grounds, as well as interfere with movements later in the summer, or even in winter as more WAH caribou are remaining north throughout the winter (Joly et al. 2025). Such interference could influence herd productivity and body condition, potentially leading to population-level consequences. As noted above for the TCH, we previously requested quantitative estimation using robust scientific methodology to predict the probabilities of population level effects under each alternative but this has not been done. Since the Utukok River Uplands Special Area was designated in this region to protect the WAH, population level effects would violate the intent of Congress in the Naval Petroleum Reserves Production Act of 1976.

This is all the more concerning in light of the marked 69% decline recorded for the WAH over the last two decades. No longer the largest herd in the state, the WAH now is subject to increasing harvest restrictions. These trends have led the Western Arctic Caribou Herd Working Group, composed of community members and other stakeholders with caribou expertise from a wide array of perspectives, to designate the herd in a preservative declining category and recommend reduced harvest and prevention of loss and degradation of seasonal habitat. The draft EA acknowledges the decline, harvest restrictions, and management recommendations (p.A-8, A-12) but does not clearly rely on this information in selecting an alternative.

Shorebirds

The NPR-A is an important area for breeding shorebirds from the East Asian-Australasian and Central Pacific flyways. Globally, many shorebird species’ populations are declining and the existence of breeding habitat within the NPR-A offsets further declines. However, impacts to shorebird breeding habitat within the NPR-A could reduce or remove these offsets. It is important for BLM to consider any significant negative global impacts to shorebirds.

The lack of protection under Alternative E could negatively impact the Qupatuk East Asian-Australasian Flyway Network Site. The Qupatuk site, located northeast of Teshekpuk Lake, is a part of the East Asian-Australasian Flyway Network Partnership system. This internationally recognized site is important, featuring a significant proportion of the breeding population of dunlin (*Calidris alpina arctica*), breeding habitat for approximately 30,000 migratory waterbirds, and habitat for threatened Steller’s eider (*Polysticta stelleri*) and spectacled eider (*Somateria fischeri*). Surface development here will threaten the integrity of this site. Indeed, the simulation study conducted by Fullman et al. (2021b) predicted significantly greater loss of high-quality suitable habitat for six out of eight shorebird species investigated under Alternative D compared to Alternative A. The similarity of leasing restrictions indicates similar impacts are expected under Alternative E. It does not seem that BLM has taken this into account in the Draft EA.

Alternative E moves the southern boundary of the Teshekpuk Lake Special Area to the north. This will remove important protection of habitat for ducks, geese, swans, and shorebirds. With the entire Special Area open to leasing under Alternative E, new pipelines and other infrastructure will increase the impact predators have on shorebirds and other nesting species by providing increased perching and nesting/denning habitat for predators. **We request the EA maintain the Teshekpuk Lake Special Area southern boundary.**

IAP Required Operating Procedures

There are several improvements and other areas for concern with the Required Operating Procedures (ROPs) for BLM's proposed alternative in the Draft EA. These include:

- ROP A-4
 - Reducing potential for spills of hazardous chemicals is important to maintain a healthy environment. Alternative E restricts the focus of this ROP to just "fuel spills," removing mention of "crude oil, and other liquid chemical spills." It also contains less detail than Alternative A about requirements for storage containers, liner material, etc. and restricts requirements to apply only to permittees with an oil storage capacity of 1320 gallons or greater. Furthermore, procedures intended to protect the environment during overland moves and seismic exploration are removed. Taken together, these various changes drastically reduce the potential for environmental protection compared to Alternative A. **BLM should maintain the language from Alternative A.**
- ROP A-5
 - This ROP is intended to minimize impacts of refueling on the environment. While Alternative A prohibits refueling and storage of fuel within 500 feet of the active floodplain of waterbodies, Alternatives E relaxes this distance to 100 feet. This reduction in protections is not justified. **BLM should maintain the language from Alternative A.**
- ROP B-2
 - Language under Alternative E appears to strengthen protection for fish and other aquatic species and **should be applied to the selected alternative.**
- ROP C-1
 - Addition of specificity and description regarding protection of seals around their lairs and breathing holes provides important improvement of protections under Alternative E and **should be incorporated into the final selected alternative.**
 - Polar bear protections are more mixed. Under Alternative A, polar bears are not included in the caveat about potential for allowing activities near bear dens if alternative protective measures are approved, while this is relaxed under Alternative E. **The language from Alternative A should be used to ensure maximum protection of this critical predator.** Furthermore, while specificity about activity restrictions around known polar bear dens is improved in the language under Alternative E, the comment about restricting timing of activities to limit disturbance is unclear and **additional details are needed to provide guidelines for what timing is acceptable.**
- ROP C-2
 - The switch from date-based limits on operations to condition-based limits under Alternative E is an important way to deal with the variability imposed by climate change on the Arctic.
 - Alternatives B-D in the IAP/EIS increased the lag time from 1 to 2 years between ice roads being allowed to overlap. This should help reduce impacts to sensitive tundra vegetation and habitats. However, these protections have been removed entirely from Alternative E with no specification of prohibition of ice road alignment in subsequent years. **At minimum, the one-year offset from Alternative A should be implemented in the final alternative selected, and preferably there would be a reversion to a two-year offset.**

- We were pleased to see the provision that lessees provide BLM with as-built shapefiles of ice roads, snow trails and ice pads under Alternative E. Temporary winter infrastructure has been difficult to record and analyze in the past but is important for determining the full scope of potential impacts from oil and gas activities. **We ask that this provision be maintained in the selected alternative and that the ROP be updated to specify that these data will be made available to researchers upon reasonable request.** This will help ensure that the scientific community can access the information needed to evaluate potential impacts on public lands and will avoid unnecessary restriction of data.
- ROP C-4
 - Mention of invertebrates is removed from Alternative E and prohibitions on travel are reduced to only “primary” ice roads and snow trails. No explanation is given for these changes, nor is it clear what qualifies as primary roads and trails. These reductions in protections could have negative environmental impacts. **The language from Alternative A should be applied to the final selected alternative.**
- ROP E-6
 - Language here was moved from BMP E-14 but was downgraded to requiring only “at least 1” year of hydrologic and fish data, rather than at least 3 under BMP E-14 for Alternative A. **The more stringent requirements of Alternative A should be maintained in the selected alternative.**
- ROP E-10
 - Alternative E strengthens requirements to minimize bird collisions. **These protections should be included in the selected alternative.**
- ROP E-18
 - Alternative E restricts the Objective to apply to eider nests only “within the Barrow Triangle area.” No such restriction was present in Alternative A. **The final alternative should remove this narrowing of scope.**
 - Timing of ground level activity restrictions is shortened under Alternative E, with no explanation given for why the end date is moved from August 15 to July 31. Especially in light of a changing climate and extended summer seasons, it is unclear how such a shift would adequately protect eiders. While a statement is added to the action alternative about applicants being encouraged to work outside the eider nesting window, this does not convey the same level of protection as ground activity restrictions. **Language from Alternative A should be maintained in the final selected alternative to avoid a great reduction in protections for nesting eiders.**
- ROP F-1
 - Requirement *a* under Alternative E states that during design, larger landing strips and storage areas should be considered to allow the use of larger aircraft. Under BMP F-1 for Alternative A it is explicitly stated that this is to result in fewer flights to the facility. **Before such a decision is made, the IAP should specify that a cost-benefit analysis be conducted that contrasts estimated flight numbers and frequency with the acres affected based on different runway length options.** This should be used to inform the decision of whether a larger airstrip that can accommodate larger aircraft will reduce or increase net impacts to the environment.
 - **We ask that a requirement be added to this ROP that lessees and others operating aircraft within the NPR-A provide flight line shapefiles and associated metadata, including aircraft type, timing of flight, altitude, etc. to BLM.** These data should be made available to researchers upon reasonable request. Such data will enable monitoring and studies of aircraft impact. They can also be used to validate other data sources, such as sound recording data (e.g., Stinchcomb 2017).
- ROP F-2
 - The minimum altitude required for aircraft generally is increased in Alternative E to 1500 feet, compared to 1000 feet in Alternative A. **This should be incorporated into the final selected alternative.**
 - Alternative E allows deviations from altitude restrictions for flights that require sight of the ground. In some cases, such as wildlife surveys, this is reasonable and justified, however addition of industry engineering surveys and ice road planning flights to the examples of permissible flights seems to greatly expand the possible range of impacts. **Additional details and justifications are needed for what kinds of allowances will be granted and how protections for sensitive species and areas will be maintained.**

- Alternative E states that “BLM will provide maps and data of the areas listed above” so that key seasonal habitat can be avoided. **Additional details need to be provided about how the locations of these areas will be determined, what data will be used, and how maps will be updated from year to year and even within years as species distributions change.**
- ROP H-5
 - The requirement to make summary reports and data from studies on BLM lands publicly available is important to advancing scientific knowledge and public understanding of publicly-owned lands. **We appreciate inclusion of this in Alternative E and ask that this be included in the final selected alternative.**
 - While it is reasonable that exceptions can be granted to public availability of data in the case of sensitive data, **we ask that the language of the ROP be updated to state that if such exceptions are granted, it should be made clear to the public what data are being withheld, what justification is given for data being withheld, and what the process is for appeal or request for reasonable use of restricted data.** This will strike an appropriate balance between protecting sensitive information and enabling inquiry.
- ROP M-1
 - Language is strengthened here under Alternative E and **should be incorporated into the selected alternative.**
 - There is an opportunity to provide critical data that can inform studies of road impacts on caribou. **We ask that the ROP be updated so that monitoring is required, not optional as in M-1e, and that monitoring include records of traffic numbers on road segments to enable better studies of road and vehicle activity impacts on caribou and other species.** Previous work has shown that traffic level affects the impacts of roads on species such as caribou (e.g., Leblond et al. 2013; Prichard et al. 2022; Severson et al. 2023). It is rare that such data are collected in a proactive manner. This would provide an excellent opportunity to collect such information and enable studies.

Thank you for considering our comments on the NPR-A IAP Draft EA. We appreciate the opportunity to provide input and hope that our wildlife professional expertise will be duly considered and incorporated into the final EA. Feel free to contact us with any questions or for additional information.

On behalf of the Executive Board and membership of the Alaska Chapter of The Wildlife Society,



Alex Lewis
President-Elect, Alaska Chapter of The Wildlife Society

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