

**United States Department of the Interior
Bureau of Land Management**

Environmental Assessment

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Big Game Backcountry Guides
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Arctic Field Office, Fairbanks, Alaska

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TABLE OF CONTENTS

LIST OF ACRONYMS	3
Chapter 1 Introduction.....	4
1 Summary	4
1.1 Need for Action	5
1.2 Purpose of Action	5
1.3 Related Statutes, Regulations, Policies, and Programs	5
1.4 Decision to be Made	5
1.5 Scoping & Issues	5
1.6 Public Involvement	8
Chapter 2 Proposed Action and Alternatives.....	8
2.1 Proposed Action.....	8
2.1.1 Access	8
2.1.2 Crew	8
2.1.3 Camps.....	9
2.1.3 Emergency Plan.....	9
2.2 No-Action Alternative	9
Chapter 3. Affected Environment	10
3.1 Scope of Analysis	10
Chapter 4. Environmental Impacts.....	10
4.1 Direct and Indirect Effects.....	10
4.2 Cumulative Effects	10
4.3 Mitigation and Monitoring.....	10
4.4 Additional Mitigation and Monitoring	111
4.5 Summary of Environmental Consequences.....	11
Chapter 5. Tribes, Individuals, Organizations, or Agencies Consulted	12
5.1 Agency, Organizations, Persons Consulted.....	12
5.2 List of Preparers.....	12
Chapter 6. References.....	13

LIST OF TABLES

Table 1.1 Issues Considered in Evaluating Impacts.....	6
Table 5.1 List of Preparers.....	12

LIST OF FIGURES

Figure 1. Portion of Alaska Game Unit Area Map Showing proposed use area within GUA 26-12.....	4
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LIST OF Appendixes

Appendix A Legal Description of Project.....	14
Appendix B Arctic Field Office Non Oil & Gas Permit Stipulations.....	17

LIST OF ACRONYMS

ACEC.....	Area of Critical Environmental Concern
ADEC.....	Alaska Department of Environmental Conservation
AFO.....	Arctic Field Office
ANILCA.....	Alaska National Interest Land Conservation Act
AO.....	(BLM) Authorized Officer
BGBG.....	Big Game Backcountry Guides
BLM.....	Bureau of Land Management
CEQ.....	Council of Environmental Quality
CRSAMP.....	Colville River Special Area Management Plan
CPR.....	Cardiopulmonary Resuscitation
EA.....	Environmental Assessment
EFH.....	Essential Fish Habitat
EIS.....	Environmental Impact Statement
ELT.....	Emergency Locator Transmitter
EMT.....	Emergency Medical Technician
EO.....	Executive Order
EPA.....	U.S. Environmental Protection Agency
FEIS.....	Final Environmental Impact Statement
FLPMA.....	Federal Land Policy and Management Act of 1976
GMU.....	Game Management Unit
IAP.....	Integrated Activity Plan
NEPA.....	National Environmental Policy Act
NPR-A.....	National Petroleum Reserve – Alaska
NPRPA.....	Naval Petroleum Reserve Production Act
NSB.....	North Slope Borough
RMP.....	Resource Management Plan
ROD.....	Record of Decision
USCOE.....	United States Corp of Engineers
USDOL.....	United States Department of Interior

Chapter 1 Introduction

1. Summary

Mr. Riley Pitts, doing business as Big Game Backcountry Guides (BGBG), has requested authorization to conduct guided hunts within the National Petroleum Reserve in Alaska (NPR-A) and south, southeast of the NPR-A on lands managed by the Bureau of Land Management (BLM). BGBG proposes to conduct guiding operations from August 20, 2015 through September 10, 2015 in State of Alaska Guide Use Area 26-12 (figure 1).

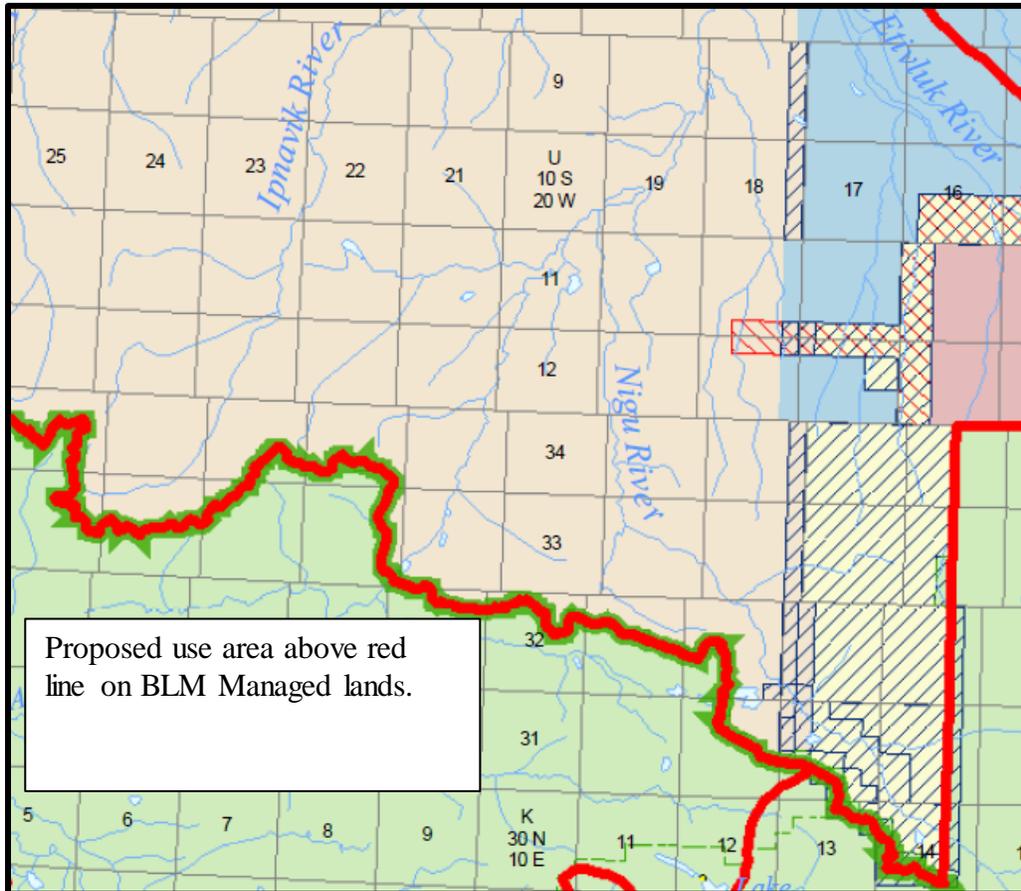


Figure 1: Portion of State of Alaska Game Unit Area Map showing proposed use area within GUA 26-12

Lands Involved: Proposed activity would take place in southern NPR-A and south southeast of the NPR-A in the vicinity of Etivlik Lake and Akuliak Lake. See Appendix A for a complete legal description.

1.1 Need for Action

The need for action is established by the Federal Land Policy and Management Act (FLPMA) of 1976 (FLPMA) direction to respond to requests for authorizations and to grant authorizations to qualified individuals or agencies.

1.2 Purpose of Action

The purpose for action is to provide access and use of public lands within the NPR-A and lands south, southeast of the NPR-A in a manner that protects the natural resources of public lands and prevents unnecessary or undue degradation. The objective of the proposed action is to allow the applicant to conduct guided hunts on BLM managed lands.

1.3 Related Statutes, Regulations, Policies, and Programs

This Environmental Assessment (EA) document fulfills the requirement of the National Environmental Policy Act of 1969 (NEPA). The EA will be based on the findings, management controls, and protective measures of the 2012 Final National Petroleum Reserve-Alaska Integrated Activity Plan/Environmental Impact Statement (IAP/EIS), the associated 2013 Record of Decision (ROD), the 2008 Colville River Special Area Management Plan (CRSAMP), the Western Arctic Resource Management Plan (RMP) evaluated 1990, the 1991 Utility Corridor Resource Management Plan (RMP), and the 1989 Utility Corridor Final Environmental Impact Statement (FEIS) as well as other laws and regulations. The action, as proposed, is consistent with the objectives outlined in these documents and not in conflict with other resources in the area. The proposed use is in conformance with current policy of the BLM Arctic Field Office (AFO).

The proposed action is in conformance with the IAP/EIS, associated ROD, the CRSAMP, associated ROD, and the National Petroleum Reserve Product Act (NPRPA), Federal Land Policy Management Act (FLPMA), Alaska National Interest Lands Conservation Act (ANILCA) Endangered Species Act, Executive Order (EO) 11988, and EO 11990.

1.4 Decision to be Made

The BLM would make a decision whether or not to issue the authorizations to conduct guided hunts within Game Management Unit (GMU) 26-12. The BLM would also determine the mitigation measures necessary to prevent undue and unnecessary degradation of the resources and to protect the natural and other values of BLM-managed lands.

1.5 Scoping and Issues

Public notification of the Environmental Analysis was announced on March 23, 2015 in the NEPA Register on file at the BLM Environmental Assessment web site https://www.blm.gov/epl-front-office/eplanning/nepa/nepa_register.do. No public comments have been received through May 4, 2015. Development of the 2012 IAP/EIS involved extensive input from other Federal agencies, the State, the NSB, thousands of individuals, and many

institutions. BLM guidelines include a list of issues that are addressed, where applicable, in NEPA assessments, (USDOI BLM 2012). Some elements are not present in the project area and are, therefore, not discussed further. A summary listing of related issues considered by AFO Field Staff is provided in Table 1.1.

Table 1.1 Issues Considered in Evaluating Impacts

Issue Considered	Determination	Basis of Determination (See Note 1)¹
ACEC's	Minimal Impact	Protection provided by project specific stipulations, Arctic Field Office Non Oil and Gas Permit Stipulations, and SRP standard stipulations.
Air Quality	Not Present	
Cultural and Paleontological Resources	Minimal Impact	Archaeological survey completed; no identified paleontological resources in the project area. Cultural resources expected to remain unaffected based on location and avoidance by applicant; no impacts to potentially unidentified resources expected, based on and <i>de minimus</i> surface disturbance. Protection provided by: permit stipulations V.A and B.
Environmental Justice	Minimal Impact to Not Present	No disproportionately high and adverse human health or environmental effects to minority residents of the NPR-A have been identified for the proposed project. Impacts to subsistence use from this project in and of itself are not expected to be more than minor and short term. Protection provided by ANILCA 810 and Permit Stipulations II, III, and IX.
Fisheries	Minimally Impacted	Protections provided by stipulations II-A, II-B, and XI-C, as well as ADF&G sportfish regulations. EFH assessment finding is <i>not likely to adversely affect</i> .
Floodplains/Wetlands and Riparian Zones	Minimal Impact	Protections provided by stipulations II-A, X-A, XI-C-6,7
Invasive, Non-native species	Minimal Impact to Not Present	No ground vehicles would be involved in this operation.
Native American Religious Concerns	Not Present	
Recreation	Minimally Impacted	Protection provided by: permit stipulations V.A and B.II A, IIB,IIIA, IIIC, IIIE, IIIF, IIIG, VIIA, VIIC, VIIG, VIIIA, XA,XI AND XII.
Sociocultural Systems	Minimally Impacted to Not Present	Impacts to social systems from guided hunting activities are not expected to be more than minor and short term. Protection provided by ANILCA Section 810 and permit stipulations II, III, and IX.
Subsistence	Minimally Impacted	Large game could be harvested from areas of activity, but direct effects to subsistence resources are expected to be short-term and minor. ANILCA 810 Evaluation and Findings by BLM required, evaluation found no significant impact to fisheries, wildlife, or other resources. Additional protection provided by permit stipulation XI.
Threatened & Endangered Species Steller's eider	Not Present	

Issue Considered	Determination	Basis of Determination (See Note 1) ¹
Threatened & Endangered Species Spectacled eider	Not Present	
Threatened & Endangered Species Polar Bear	Not Present	
Non threatened and endangered birds	Minimally Impacted	No impacts are expected other than those already covered in 2012 NPRA Final IAP/EIS. Protections are provided by Stipulations XII B and C.
Non threatened and endangered mammals	Minimally Impacted	Caribou, grizzly bear, wolf, wolverine and small mammals (weasel, rodents, and shrews) may inhabit the area. Obvious impacts to harvested individuals. No impacts expected to populations other than those already covered in 2012 NPRA Final IAP/EIS. Protection provided by Stipulations III.A, III.E, XII.A and XII.C, Appendix B..
Vegetation	Minimally Impacted	Protection provided by Stipulation X.A, Appendix B.
Visual Resource Management	Minimally Impacted	Protection provided by: permit stipulations II A, IIB, IIIA, IIIC, IIIE, IIIF, IIIG, VIIA, VIIC, VIIG, VIIIA, XA, XI AND XII.
Water Resources	Minimally Impacted	Protection provided by stipulations II-A, VIII-A, XI-C-6,7
Waste (Hazardous/Solid)	Minimally Impacted	Protection provided by: permit stipulations XI.
Wild & Scenic Rivers	Not Present	
Wilderness Characteristics	Minimally Impacted	Protection provided by: permit stipulations IIIC, IIIE, IIIF, IIIG, VIIG, VIIIA, XA, and XI.

Key to Table 1.1

ACEC- Area of Critical Environmental Concern
ANILCA- Alaska National Interest Lands Conservation Act
BLM – Bureau of Land Management
EFH – Essential Fish Habitat

EO- Executive Order
IAP/EIS- Integrated Activity Plan/Environmental Impact Statement
NPRA-National Petroleum Reserve in Alaska
SRP – Special Recreation Permit

Potentially Affected: The proposed action or alternative could result in potential impacts to resource or issues to the level that additional mitigation may be required, or there is a need to evaluate potentially significant issues.

Minimally Impacted: Resources or issues would not be affected to a degree requiring further analysis because either the expected impacts from the proposed action and alternative would be minimal, or standard protections (e.g., Stipulations from overriding BLM plans or other legal protections) would reduce impacts. Minimally impacted resources or issues would not be analyzed further in this EA.

Not Present: Resources or issues are not expected to be affected by the proposed action or alternatives because activities would occur at a different time or place. Resource or issues not present would not be analyzed further in the EA.

Notes, Table 1.1:

¹ Determination tiered from: 2012 IAP/EIS Vo1. 2, Chap. 4; 2013 ROD; and laws and regulations as noted.

In summary, BLM resource specialists have not identified issues for further evaluation in this EA. Environmental characteristics of the general project area have been extensively described in the 2012 NPR-A IAP/EIS (Vol. 1, Chapter 3), the Western Arctic Resource Management Plan (RMP) evaluated 1990, the 1991 Utility Corridor Resource Management Plan (RMP), and the 1989 Utility Corridor Final Environmental Impact Statement (FEIS) to which this analysis is tiered.

1.6 Public Involvement

Development of the NPR-A IAP/EIS (USDOI BLM 2012) and CRSAMP involved extensive input from Federal agencies, the State, the NSB, thousands of individuals, and many institutions.

Chapter 2. Proposed Action and Alternatives

2.1 Proposed Action

The proposed action is to authorize a Special Recreation Permit that would allow BGBG to conduct guided hunts on BLM managed lands within GUA 26-12. BGBG would guide their clients for the big game species of caribou and grizzly bear. The applicant proposes to have a spike camp at each of the following locations:

Latitude	Longitude	Township	Range	Section	Lake
68° 14' 42.21"	156° 47' 30.57"	33 North	9 East	21 NWSE	Akuliak Lake
68° 7' 44.76"	156° 2' 36.687"	32 North	12 East	35 NESE 36 NWSW	Etivlik Lake

All activity would take place within 20 miles of the two spike camps.

2.1.1 Access

Transportation to and from the area would be via a fixed wing float plane at the west shore of Etiviluk Lake (68° 9' 20.16"N, 156° 1' 32.97"). The float plane would be a charter with a chartered air taxi. BGBG anticipates a total of 6 take offs and landings for the season. There would be no fuel storage (other than cooking gas); planes would be fueled in Bettles.

2.1.2 Crew

Mr. Pitts would be present and in charge of the camp for the entirety of the operation. He would hire one other guide and possibly a packer. Mr. Pitts expects to have 2 to 4 hunters at one time for an 8 day hunt. The ratio of crew to client would either be 1 to 1 or 1 to 2. The maximum number of clients for the season would be 12.

2.1.3 Camps

Camps would be set up approximately from August 20 to September 10. Cooking would be done with small MSR cook stoves. Camp would include Hilliberg Soulo tents. Game meat would be stored in heavy duty game bags that BGBG has custom made with synthetic canvas. Mr. Pitts asserts the game bags are very durable and are washable and reusable. The synthetic material does not hold moisture but is very breathable helping fight against bacteria. The game bags would be placed on large boulders to transfer the cold temperatures through permafrost and help in keeping the meat clean. Meat would be covered with a tarp to protect from sun and moisture. As soon as practical meat would be flown out of the spike camp to Bettles.

Food at the spike camps would be stored in dry bags in backpacks or Aluminum Kitchen boxes that are bear proof. Most of the food would be Mountain House Freeze dried meals, snacks and energy bars. Mr. Pitts would precook some meals, vacuum seal and freeze for the trip. Drinking water would be filtered from lake water.

The WAG bag system of human waste management will be utilized at the camps. The Arctic Field Office stipulations require toilet paper be packed out.

2.1.4 Emergency Plan

Mr. Pitts states that he is current in First Aid training, Cardiopulmonary resuscitation (CPR) certified and is a Wilderness First Responder and Wilderness Emergency Medical Technicians (EMT). He instructs the guides on safety, travel and the BGBG emergency plan and evacuation. BGBG would have a Satellite phone in camp. He will phone his wife nightly and keep a journal of day to day activities. Guides would have their own satellite phone, ELT, aviation radio and first aid kit. In a minor injury an air taxi would be contacted through a satellite phone and the patient evacuated. In a life threatening emergency an Emergency Locator Transmitter (ELT) would be activated followed by a Satellite phone call to Flight Service. Patient would be treated in the field with First Responder skills. Guides are seasoned in Arctic hunting, camping and travel.

2.2 No-Action Alternative

Under no action, the BLM would not grant a special recreation permit to BGBG. The current land management situation would continue. Chapter III (Affected Environment) of the AIP/EIS, Western Arctic RMP, Utility Corridor RMP & FEIS provide detailed profiles of the environmental conditions in the region. The types of activities in the area are described in Chapter IV of the respective documents. Common ongoing activities include oil and gas exploration and development, research and monitoring, recreation, subsistence, and travel. These activities would continue under the no action alternative, but the special recreation permit for BGBG would not be provided.

Chapter 3. Affected Environment

3.1 Scope of Analysis

Details of the environmental characteristics of the general project area have been extensively described in the documents listed below, to which this analysis is tiered:

- National Petroleum Reserve-Alaska, Supplemental Integrated Activity Plan/Environmental Impact Statement (2012) and Record of Decision, February, 2013

Review of the proposed project for potential issues (Section 1.5) indicated no or minimal impacts to air quality, cultural and paleontological resources, fish Flood Plains/Wetlands and Riparian Zones Native American Religious Concerns, Recreation, subsistence, non threatened/endangered birds and mammals, vegetation, visual resource management, water resources, or waste management (See Table 1.1 for complete list of issues considered).

Chapter 4. Environmental Impacts

4.1 Direct and Indirect Effects

BLM resource specialists have not identified issues for further evaluation in this EA. Review of the proposed project for potential issues (Section 1.5) indicated no or minimal impacts to air quality, cultural and paleontological resources, fish, flood plains/wetlands/riparian zones, Native American religious concerns, recreation, subsistence, non-threatened-endangered birds and mammals, vegetation, visual resource management, water resources, or waste management (See Table 1.1 for complete list of issues considered).

4.2 Cumulative Effects

Cumulative impacts result from the incremental addition of past, present, and reasonably foreseeable actions. Each action may be individually minor by itself, but when added to others could become significant over a period of time.

The time frame for the proposed action for the project area is 1977 (designation of NPR-A) to 5 years into the future, assuming that the relatively low level of activity and management would remain at about the same level as present. BLM resource specialists have not identified issues for further evaluation in this EA. Activity such as guided hunting have been analyzed in the plans from which this EA is tiered.

4.3 Mitigation and Monitoring

The terms and conditions that will be attached to the permit are: the Arctic Field Office standard stipulations (Appendix B) entitled "ARCTIC FIELD OFFICE NON OIL AND GAS PERMIT

STIPULATIONS” and “US Department of the Interior Bureau of Land Management Commercial Land-Based Special Recreation Permit Stipulations (Appendix C).”

4.4 Additional Mitigation and Monitoring

The BLM will incorporate the following additional mitigation measures into approval of the SRP. BGBG shall:

1. Prior to conducting activity on BLM managed lands within GUA 26-12, permittee shall provide a copy of the State of Alaska Guide License.
2. Follow guidance regarding required conduct near possible nest of raptors provided in document entitled: Conduct near possible raptor nests.
3. Visits to cliffs containing active raptor nests are not authorized.
4. Grantee will maintain an aircraft log of the following information **for each take off and landing** (which shall be turned in to BLM in **electronic** format in an excel spreadsheet with each item below listed in a separate column **No Later Than 1 November**):

Type of Aircraft
Aircraft N number
Date
Time
Decimal Degree Format – latitude of takeoff location
Decimal Degree Format – longitude of takeoff location
Date
Time
Decimal Degree Format – latitude of landing location
Decimal Degree Format – longitude of landing location

4.5 Summary of Environmental Consequences

There were no potential issues identified in this EA further evaluation due to the proposed action (see Table 1.1). The valued environmental components included:

ACEC's
Air Quality
Cultural and Paleontological Resources
Environmental Justice
Fish
Flood Plains/Wetlands and Riparian Zones
Invasive, Non-native species
Native American Religious Concerns
Recreation
Sociocultural Systems
Subsistence
Threatened & Endangered Species Spectacled and Steller's

Threatened & Endangered Species Polar Bear
 Non threatened and endangered birds
 Non threatened and endangered mammals
 Vegetation
 Visual Resource Management
 Water Resources
 Waste (Hazardous/Solid)
 Wild & Scenic Rivers
 Wilderness Characteristics and Wild Lands

The screening analysis by the interdisciplinary team found that impacts would be short term and localized and that project-specific and standard mitigation measures listed in Appendix A, would prevent potential significant environmental impacts. The proposed action would not contribute to significant adverse direct, indirect or cumulative effects to resources in the proposed project area.

Chapter 5. Tribes, Individuals, Organizations, or Agencies Consulted

5.1 Agencies, Organization, Persons Consulted

Public notification of the Environmental analysis will be on file at the Arctic Field Office and available on the Arctic Field Office Environmental Assessment web site.

5.2 List of Preparers

Table 5.1 List of Preparers

Name	Title	Responsible for the Following Section(s) of this Document:
Richard Kemnitz	Hydrologist	Water Resources, Floodplains/wetlands and Riparian Zones
Stacie McIntosh	Supervisory Social Scientist/ Authorized Officer	Cultural and Paleontological Resources
Stacey Fritz	Anthropologist/Subsistence Specialist	Subsistence, connected ANILCA 810 evaluation
Debbie Nigro	Wildlife Biologist	Table 1.1 sections T&E species spectacled and Steller's eider and polar bear, Section 4.4 Additional Mitigation and Monitoring Stipulations 2 - 4
Matthew Whitman	Fish Biologist	Fisheries
Donna Wixon	Natural Resource Specialist, Project Lead	Lands and Realty Recreation, Wilderness Values, Visual Resource Management
Dave Yokel	Wildlife Biologist	Weeds, mammals and vegetation.

ANILCA Requirements

Section 810 Subsistence Evaluation

This proposed action will not significantly restrict subsistence uses. No reasonably foreseeable and significant decrease in the abundance of harvestable resources or in the distribution of harvestable resources, and no reasonably foreseeable limitations on harvester access will result from the proposed action.

Chapter 6. References

- Council on Environmental Quality (CEQ). 1997. Considering Cumulative Effects Under the National Environmental Policy Act. December.
- Grunblatt, J., Atwood, D. 2013. Mapping Lakes for Winter Liquid Water Availability Using SAR on the North Slope of Alaska. International Journal of Applied Earth Observation and Geoinformation 27 (Part A): 63-69. <http://dx.doi.org/10.1016/j.jag.2013.05.006>.
- USDOI BLM 1989. Utility Corridor Final Environmental Impact Statement approved September.
- USDOI BLM 1991. Utility Corridor Resource Management Plan (RMP) approved January.
- USDOI BLM 2008. Colville River Special Area Management Plan and Environmental Assessment. BLM Arctic Field Office, Fairbanks, Alaska
- USDOI BLM. 2012. National Petroleum Reserve-Alaska Integrated Activity Plan Environmental Impact Statement. November.
- USDOI BLM. 2013. National Petroleum Reserve-Alaska Integrated Activity Plan Environmental Impact Statement. Record of Decision. February.

APPENDIX A

Legal Description of Project

Meridian	Township	Range	BLM Managed Sections	Non BLM Managed Sections
Umiat	9 South	25 West	1-36	
Umiat	9 South	24 West	1-36	
Umiat	9 South	23 West	1-36	
Umiat	9 South	22 West	1-36	
Umiat	9 South	21 West	1-36	
			1-36	
Umiat	9 South	19 West	1-36	
Umiat	9 South	18 West	1-36(within NPR-A Only)	1,12,13,24,25,36 (lands outside of NPR-A)
Umiat	9 South	17 West		1-36
Umiat	9 South	16 West		1-36
Umiat	9 South	15 West		1-36
Umiat	10 South	25 West	1-36	
Umiat	10 South	24 West	1-36	
Umiat	10 South	23 West	1-36	
Umiat	10 South	22 West	1-36	
Umiat	10 South	21 West	1-36	
			1-36	
Umiat	10 South	19 West	1-36	
Umiat	10 South	18 West	1-36(within NPR-A Only)	1,12,13,24,25,36 (lands outside of NPR-A)
Umiat	10 South	17 West		1-36
Umiat	10 South	16 West		1-36
Umiat	10 South	15 West		1-36
Umiat	11 South	25 West	1-36	
Umiat	11 South	24 West	1-36	
Umiat	11 South	23 West	1-36	
Umiat	11 South	22 West	1-36	
Umiat	11 South	21 West	1-36	
			1-36	
Umiat	11 South	19 West	1-36	
Umiat	11 South	18 West	1-36(within NPR-A Only)	1,12,13,24,25,36 (lands outside of NPR-A)
Umiat	11 South	17 West	31-36 (State Selected)	1-30
Umiat	11 South	16 West	5-8, 29-32 (Regional Selection)	1-7, 6-28, 33-36
Umiat	11 South	15 West		1-36
Umiat	12 South	25 West	1-30	
Umiat	12 South	24 West	1-30	

Umiat	12 South	23 West	1-30	
Umiat	12 South	22 West	1-30	
Umiat	12 South	21 West	1-30	
Umiat	12 South	19 West	1-30	
Umiat	12 South	18 West	1-30(within NPR-A Only)	1,12,13,24,25 (lands outside of NPR-A)
Umiat	12 South	17 West	1-6, [11-14(State Selected)]	7-10, 15-30
Umiat	12 South	16 West		1-36
Umiat	12 South	15 West		1-30
Kateel River	34 North	5 East	7-26, 28,29, 35,36 (Lands within NPR-A Only)	14,15,19-23, 26-35 (Lands outside of NPR-A)
Kateel River	34 North	6 East	7-36	
Kateel River	34 North	7 East	7-34 (Lands within NPR-A Only)	23, 25-27, 33-36 (Lands outside of NPR-A)
Kateel River	34 North	8 East	7-32, 35, 36 (lands within NPR-A Only)	25-36 (Lands outside of NPR-A)
Kateel River	34 North	9 East	7-36	
Kateel River	34 North	10 East	7-36	
Kateel River	34 North	11 East	7-36	
Kateel River	34 North	12 East	7-36	
Kateel River	34 North	13 East	7-36	
Kateel River	34 North	14 East	7-9, 16-21, 28-33	10-15, 22-27, 34-36
Kateel River	33 North	5 East	1,2,10-14, 24 (Lands within NPR-A Only)	2-11, 13-36 (lands outside of NPR-A)
Kateel River	33 North	6 East	1-18, 19-23 (Lands within NPR-A Only)	1-15, 17-36 (Lands outside of NPR-A)
Kateel River	33 North	7 East	4-8, 18 (Lands within NPR-A Only)	1-5, 7-36 (Lands outside of NPR-A)
Kateel River	33 North	8 East	1,2,11-14, 23-26,36 (Lands within NPR-A Only)	1-11, 13-36 (lands outside of NPR-A)
Kateel River	33 North	9 East	1-36 (Lands within NPR-A Only)	31,32 (Lands outside of NPR-A)
Kateel River	33 North	10 East	1-36	
Kateel	33 North	11 East	1-36	

River				
Kateel River	33 North	12 East	1-36	
Kateel River	33 North	13 East	1-36	
Kateel River	33 North	14 East	4-9, 16-21, 28-33	1-3, 10-15, 22-27, 34-36
Kateel River	32 North	10 East	1-7, 10-15 (Lands within NPR-A Only)	3-10, 12-36 (Lands Outside NPR-A)
Kateel River	32 North	11 East	1-18, 24 (Lands within NPR-A Only)	7-9, 13-36 (Lands Outside NPR-A)
Kateel River	32 North	12 East	1-28, 33-36 (lands within NPR-A Only)	16,17,18-21,26-33 (Lands Outside NPR-A)
Kateel River	32 North	13 East	1-36 (Excluding Noatak Lands in sections 31 & 32)	Lands within Noatak in sections 31 & 32
Kateel River	32 North	14 East	2-11, 14-23, 26-35 (Lands outside of Gates of the Arctic)	1-2, 11-14, 23-26, 35, 36 (Lands within Gates of the Arctic)
Kateel River	31 North	12 East	1-4, 9-16, 23,24 (Lands outside of Noatak Preserve)	4-9, 14-36 (Lands within Noatak Preserve)
Kateel River	31 North	13 East	1-3, 6, 7 12, 17-22, 26-29, 34-36 (Lands outside of Noatak)	4-6, 8-11, 13-17, 19, 20, 23-25, 27-34 (Lands within Noatak Preserve)
Kateel River	31 North	14 East	2-11, 14-18, 21-23, 26-28, 33-35 (Lands outside of Gates of the Arctic & Noatak)	1-2, 11-14, 19, 20, 23-26, 29-32, 35,36 (Lands within Gates of the Arctic & Noatak)
Kateel River	30 North	13 East	1-3, 11,12 (Lands outside of Gates of the Arctic & Noatak)	1-36 (Lands within Gates of the Arctic & Noatak)
Kateel River	30 North	14 East	2,3, 6-8, 14-23, 26-28 (Lands outside of Gates of the Arctic & Noatak)	1-21, 23-36 (Lands within Gates of the Arctic & Noatak)

APPENDIX B

ARCTIC FIELD OFFICE NON OIL AND GAS PERMIT STIPULATIONS

[This is a subset of the 2013 National Petroleum Reserve-Alaska Integrated Activity Plan Record of Decision, Utility Corridor Resource Management Plan/Final Environmental Impact Statement, and the Colville River Special Area Management Plan. Stipulations and Best Management Practices from these documents along with frequently utilized resource-specific stipulations are incorporated. Special Recreation Permit holders meet most requirements by following the guidelines in Leave No Trace, Alaskan Tundra.]

I. AUTHORIZED OFFICER

The Authorized Officer (AO) is the Manager, Arctic Field Office.

II. AIR & WATER

- A. All operations shall comply with applicable Air and Water Quality Standards of the State of Alaska.
- B. Grey wash water and kitchen waste water may be filtered to remove the solids and the liquid discharged to the land surface, provided the disposal area is a minimum of 100 feet from any water body or stream.

III. AIRCRAFT

- A. Hazing of wildlife by aircraft is prohibited. Pursuit of running wildlife is hazing. If wildlife begins to run as an aircraft approaches, the aircraft is too close and must break away.
- D. Use of aircraft, near known subsistence camps and cabins, and along rivers or during sensitive subsistence hunting periods (spring goose hunting and fall caribou and moose hunting) should be kept to a minimum.
- E. Aircraft used for permitted activities shall maintain an altitude of at least 2,000 feet AGL (except for takeoffs and landings) over the the Utukok River Uplands Special Area (Map 1) from May 20 through August 20, unless doing so would endanger human life or violate safe flying practices.

IV. CAMPS

- A. The Permittee accepts responsibility for their campsite conditions and will be liable for identified rehabilitation activities.
- B. Permittee shall provide BLM with a detailed map of all camp locations, trails used, and location and species harvested located accurately on a USGS quadrangle map of the 1:63,360 scale. Please include the dates of the trip, the number of people who camped at each site, and GPS location (with datum noted).
- C. Tent camps shall be situated on gravel bars, sand, or other durable substrates, if any exist in the vicinity of the desired location. If no such substrates exist nearby, tents may be pitched on tundra vegetation for up to two weeks.

V. CULTURAL/PALEONTOLOGICAL RESOURCES

- A. In accordance with the Archaeological Resources Protection Act (16 U.S.C. 470aa), the removal or disturbance of archeological or historic artifacts is prohibited. The excavation, disturbance, collection, or purchase of historical, recent, ethnological, or archaeological specimens or artifacts is prohibited. Such items include both prehistoric stone tools and sites, as well as historic log cabins, remnants of such structures, refuse dumps, and other such features. The disturbance, excavation and collection of vertebrate paleontological (fossil) remains is also prohibited.
- B. Any cultural or Paleontological resource discovered by the holder, or any person working on his behalf, situated on lands owned or controlled by the United States shall be promptly reported to the AO. Discoveries must be left in place to allow for an examination by BLM cultural or paleontological specialists. GPS Coordinates of any discovered cultural resources should be obtained if possible and reported to the AO.

VI. FIRE

- A. The BLM, through the AO, reserves the right to impose closure of any area to operators in periods when fire danger or other dangers to natural resources are severe.
- B. The authorized user shall be financially responsible for any damage done by a wildfire caused by its operations. Costs associated with wildfires include but are not limited to, damage to natural resources and costs associated with any suppression action taken on the fire.

VII. OPERATIONS

- A. It is the responsibility of the authorized user to ensure that all individuals brought to the project area under its auspices adhere to these stipulations. Authorized users of the planning area shall provide all employees, contractors, subcontractors, and clients with a briefing regarding stipulations applicable to the lease and/or permit.
- B. A copy of applicable stipulations will be posted in a conspicuous place in each work site and campsite.
- C. The provisions of this permit do not relieve the Permittee of any responsibilities or obligations required by the laws or regulations of the State of Alaska Department of Fish and Game or the U.S. Fish and Wildlife Service, or other applicable regulations related to this permit
- D. The authorized user shall protect all survey monuments and be responsible for survey costs if remonumentation is required as a result of the user's actions.
- E. Survey monuments include, but are not limited to, General Land Office and Bureau of Land Management Cadastral Survey Corners, reference corners, witness points, U.S. Coast and Geodetic benchmarks and triangulation stations, military control monuments, and recognizable civil (both public and private) survey monuments.
- F. In the event of obliteration or disturbance of any of the survey monuments above, the Permittee shall promptly report the incident, in writing, to the Authorized Officer and the respective installing agency, if known. Where General Land Office or Bureau of Land Management right-of-way monuments or references are obliterated during operations, the Permittee shall secure the services of a registered land surveyor or a Bureau Cadastral surveyor to restore the disturbed monuments and references using surveying procedures found in the Manual of Surveying Instructions for the Survey of Public Lands of the United States, latest edition. If the Bureau cadastral surveyors or other Federal surveyors are used to restore the disturbed survey monuments, the Permittee shall be responsible for survey costs.

IX. SUBSISTENCE

- A. The permittee will take no action that interferes with subsistence activities of rural users or restricts the reasonable access of subsistence users to public lands. This may include but is not limited to disturbance of wildlife and their movements near subsistence hunters, and damage to cabins, trails, traditional campsites or caches used by subsistence users. The permittee must familiarize themselves, their team, and their pilots with any subsistence camps and cabins located near their project site (map available upon request) and, when using aircraft, make all reasonable efforts to avoid disturbing hunters.
- B. The Arctic Field Office will determine on an application-by-application basis what level of consultation will be required in order to provide adequate notification to communities, including whether the project merits application of the complete H-1 (Subsistence) Best

Management Practice from the 2013 NPR-A EIS/IAP Record of Decision. Determination will be based on Arctic Field Office experience and on communication with representatives of the BLM NPR-A Subsistence Advisory Panel. Permittee will respond to questions and any reasonable requests for consultation that tribes and/or communities may have. Information on permits will be included on the NPR-A Permitted Projects spreadsheet that is distributed to tribal governments and North Slope communities. Permittee is encouraged to correspond with Arctic Field Office anthropologist/subsistence specialist if they have any questions or concerns: Stacey Fritz: (907) 474-2309, sfritz@blm.gov

X. VEGETATION

- A. All activities shall be conducted to avoid or minimize disturbance to vegetation. The clearing of vegetation for camps or aircraft landing areas is prohibited.

XI. WASTE

A. HUMAN WASTES

1. Toilet paper: Toilet paper must be packed out, or a natural alternative used. Natural options for toilet paper include snow, smooth stones or sticks, leaves and moss. Natural TP options should be disposed of the same as the human waste. Feminine hygiene products and diapers must also be packed out.
2. Urine: Urine can attract animals seeking salt: avoid urinating on plants that can be defoliated by animals attracted to the salt residue. Urinate 200 feet away from camps and trails on rock, bare ground, or water sources.
3. Recommended human excreta disposal in riparian areas: Packing out human excreta is the most eco-friendly means of waste disposal and the toilet can be located wherever is most appropriate. This method helps areas that receive high-levels of use retain their naturalness, and preserves pristine areas. Disadvantages include: it incurs cost and requires logistical considerations.

The WAG (Waste Alleviation and Gelling) Bag has become the overall term for any pack-it-out bag system. It generally involves one bag with which holds the excrement and another sturdier, sealable bag. Commercial vendors of waste bag kits, powders and supplies include ReStop, Biffy Bags, and Cleanwaste.

B. GARBAGE

1. Attracting wildlife to food and garbage is prohibited.
2. Burial of garbage is prohibited. Burial of human waste is prohibited except as authorized by the AO. [Special Recreation Permit holders meet all requirements by following the guidelines in Leave No Trace, Alaska Tundra.]

3. Areas of operation shall be left clean of all debris.

C. FUEL

1. Notice of any spill shall be given to the AO as soon as possible or to the BLM Arctic Field Office Hazmat Coordinator, Donna Wixon (work/message 907-474-2301). Other Federal, State, and NSB entities shall be notified as required by law.
2. All spills shall be cleaned up immediately and to the satisfaction of the AO and all agencies with regulatory authority over spills, including the Alaska Department of Environmental Conservation (ADEC), (1800-478-9300) (Alaska Statute Title 18, Chapter 75, Article 2).
3. State and Federal safety standards for fuel handling will be followed.

D. PESTICIDES

Use of pesticides without the specific authority of the AO is prohibited.

XII. WILDLIFE

- B. The feeding of wildlife is prohibited and will be subject to non-compliance regulations.
 - B. Camp sites shall be located at least 500 meters from any known arctic peregrine falcon nest site.

APPENDIX C

UNITED STATES DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

COMMERCIAL LAND-BASED SPECIAL RECREATION PERMIT STIPULATIONS

Name of Company: Big Game Backcountry Guides
Special Recreation Permit Number: FF096966
SRP Valid from: May 6, 2015 – May 6, 2016
Activities authorized by this SRP: Guided Hunting Trips
Pre-trip Itineraries Required? No
Post Use Report Due: October 15, 2015
Minimum Insurance Requirements: \$300,000
Fee formula: Greater of \$105 per year or 3% of gross revenue.
Applicable deductions and/or discounts: TBD

BLM Alaska Terms and Stipulations

A. General

(1) Permits issued for more than one year are subject to annual validation. To secure validation the permit holder must:

(a) have performed satisfactorily under the terms and conditions of this permit and be in conformance with applicable Federal, State, and local laws, ordinances, regulations, orders, postings, and written requirements applicable to the area and operation covered by the permit,

(b) ensure that all persons operating under the permit have obtained all required Federal, State, and local licenses or registrations,

(c) have on file, with the office issuing the permit, current insurance identifying the U.S. Government as additional insured as specified in stipulation C, and

(d) have no outstanding, past due, or unpaid billing notices.

(2) Permittees may not leave unattended personal property on public lands administered by the Bureau of Land Management for a period of more than 48 hours without written permission of the authorized officer, with the exception that vehicles may be parked in designated parking areas for up to 14 consecutive days. Unattended personal property is subject to disposition under the Federal Property and Administrative Services Act of 1949 as amended.

(3) The permit only authorizes the use for the activity, the time(s) and in the area(s) specifically described above.

(4) The permittee must maintain on file with the BLM a current and correct list of employees who will be conducting services for the company on public land. Persons providing services under this permit must be an employee of the permittee.

(5) Placement of caches of supplies and food or equipment for future trips is not allowed unless specifically authorized.

(6) The permittee must allow BLM representatives to complete permit checks to determine the validity of the permit, ascertain the group has a copy of the permit, all required equipment, and to orient trip participants about the use of public lands and safety.

B. Financial

(1) The permittee must submit a post use report by October 15th, 2015. Alternative reporting arrangements may be established by written agreement with the authorized officer. An extension of this due date may be approved by the issuing office on a case-by-case basis.

The report must contain a trip-by-trip log of: trip location, beginning and ending dates of each trip, number of clients, number of guides, and gross receipts for the trip. In reporting gross receipts, the outfitter will report all payments made by the customer, with the only exception being retail sales of durable goods that remain the property of the customer and have an expected service life extending beyond the guided activity. The request for deductions based on pre- and post- trip transportation and lodging expenses and percentage of time on public land, if being claimed, must also be submitted at this time. Requests for transportation and lodging deductions must be accompanied by copies of supporting receipts documenting proof of payment.

(2) The permittee must submit a Post Use Report to the authorized officer for every year the permit is in effect. If the post use report is not received by the established deadline (see above) the following late fee schedule will be initiated:

- More than 15 days but less than 30 days after the due date: \$125
- More than 30 days after the due date, but less than 45 days: \$250

Post use reports submitted more than 45 days after the due date may result in criminal, civil, and/or administrative action to protect the interest of the United States.

(3) The permittee must maintain the following internal accounting records pertaining to the permit:

- (a) W-2 records or a similar record of employment for all employees conducting trips under the permit,
- (b) a record of all financial relationships with booking agents or advertisers,
- (c) a record of all receipts or compensation including payments, gratuities, donations, gifts, bartering, etc., received from any source on trips conducted under the permit, and
- (d) a record of all payments made by the permittee and claimed as a deduction in the permittee's fee submission.

The BLM retains the right to verify permit compliance from the books, correspondence, memoranda, and other records of the permittee, and from the records pertaining thereto of a proprietary or affiliated company during the period of the permit and for three (3) years thereafter regardless of physical location.

C. Insurance

(1) At a minimum, the permittee shall have in force public liability insurance in the appropriate amount as shown on page one.

General Guidelines for Minimum Insurance Requirements

SRP Event or Activity	Per Occurrence	Per Annual Aggregate
Low Risk: general non-competitive and non-commercial activities such as group camping, group activities, mounted orienteering, backpacking, or dog trials.	\$300,000	\$600,000
Moderate Risk: whitewater boating, horse endurance rides, OHV events, mountain bike races, rock climbing (with ropes), ultra-light outings, rodeos	\$500,000	\$1,000,000
High Risk: bungee jumping, speed record events, unaided rock climbing	\$1,000,000	\$2,000,000 - \$10,000,000

(2) The policy shall state that the insurance company shall have no right of subornation against the United States of America.

(3) Such insurance must name the United States Government as additional insured and provide for specific coverage of the permittee's contractually assumed obligation to indemnify the United States.

(4) The policy shall stipulate that the authorized officer of the Bureau of Land Management shall be notified 30 days in advance of the termination or modification of the policy.

(5) The permit is not valid unless the permittee maintains a current authenticated certificate of the required insurance on file with the office issuing the permit.

(6) The permittee shall indemnify and hold harmless the United States against any responsibility or liability for damage, death, injury, or loss to persons and property which may occur during the permitted use period or as a result of such use.

(7) The permittee shall furnish a copy of the insurance policy directly to the authorized officer.

(8) The name of the insured on the insurance policy must be the same as the name on the permit. Those permittees holding insurance policies which only insure the permittee and not the permittee's employees must ensure that their employees also have the required insurance in effect, and that a certificate of insurance is furnished to the authorized officer.

(9) For multi-year permits, the insurance policy must be provided the first year, but on each subsequent year the authorized officer may accept a valid certificate of insurance.

(10) The insurance need only be valid during periods of actual use.

D. Pre-Trip Itinerary

Prior to each trip, the permittee will file a notice of intent in writing with the BLM. The notice of intent must specify the intended dates of the trip, number of clients, number of guides, name of

the lead guide and area to be visited, including the location of camps. Alternative reporting arrangements may be specified in writing by the Authorized Officer.

E. Environmental and Resource Protection

All trips must conform to *Leave No Trace* principles.

(1) The number of participants on any trip, including guides, may not exceed the number specified in the permittee's operating plan and approved permit. The exception to this requirement is over-the-road bus tours using state and Federal highway and class B county roads.

(2) No camping is permitted within 300 feet of a known prehistoric or historic site.

(3) No camping is permitted within 300 feet of a water source other than perennial streams unless prior authorization is received from the authorizing officer.

F. Safety and Equipment

(1) The permittee shall provide the equipment necessary to serve the public in a safe manner. The permittee will ensure that trips are conducted in compliance with all laws and regulations relating to vehicle operations, land use restrictions, food handling, and any other applicable regulations.

(2) Every person serving as a guide on public land must at a minimum be trained and currently certified in Basic First Aid and Cardio-pulmonary Resuscitation (CPR). Each guide must have legible copies of certification cards in his/her possession while operating under a BLM Special Recreation Permit in Alaska. In addition, certification cards must be filed at the permittee's headquarters and available for BLM review if necessary.

(3) The following equipment must be carried on all commercial trips: (a) A first aid kit adequate to accommodate each activity, group, or subgroup will be carried on all trips.

(b) Adequate repair kits and spare supplies appropriate for the trip and activity.