

Documentation of NEPA Adequacy (DNA)

**U.S. Department of the Interior
Bureau of Land Management**

Preparing Office: Arctic Field Office

DOI-BLM-LLAKF010-2015-0017-DNA

Serial/Lease/Case File Number: **Serial # FF096976**

Project Title/Type of Action: **Summer Activities in the NPR-A (2984.01)**

Applicant: **ConocoPhillips Alaska, Inc.**

Address: **P.O. Box 100360
Anchorage, Alaska 99510-0360**

Date: **May 19, 2015**

Lands Involved: **Northeastern NPR-A, specifically general area of Greater Mooses Tooth and Bear Tooth Units.** See Attachment B for complete legal description.

A. Description of the Proposed Action and any applicable mitigation measures

ConocoPhillips Alaska, Inc. (CPAI) has requested authorization to conduct environmental studies, pre-development scouting, exploration well preparation, inspection and other activities in the National Petroleum Reserve Alaska (NPR-A). The company and its contractors propose to conduct a variety of studies including but not limited to engineering, geological, biological, hydrological, archaeological, cultural, and lake studies (See list of activities studies in Table 1). Additional studies concerning placement of oil wells and potential access routes are possible. The studies would commence in May and continue through the fall of 2015. The authorization would expire September 30, 2015.

These studies would use helicopters for transportation to and from the study area (see Figure 1). On the ground, activities would be performed on foot, and crew size would be from two to six people, depending on the project. Approximately 908 helicopter landings/take-offs are requested during the season (for each landing an associated take off is also counted).

Table 1. CPAI Summer Field Work, National Petroleum Reserve Alaska, 2014 Description of Proposed Activities.

Activity	Description	Time Period(s)	Number Personnel (including pilot)	Access	Forecasted Number of Landings for 2015	Consultation
Tundra Damage Assessments	Inspect tundra damage locations incurred during 2015 Lookout Seismic project; to assess need for additional rehab treatment.	July-August	Approximately 3 people	Helicopter	10	Weekly updates to KSOP, Native Village of Nuiqsut tribal council, City of Nuiqsut, , NSB and others.
Environmental Studies - Hydrology	Hydrology Monitoring	Spring breakup - late May, early June through September (end of season)	Approximately 4 people	Helicopter	45	Weekly updates to KSOP, Native Village of Nuiqsut tribal council, , NSB and others.
Environmental Studies – Weather Station Support	Weather station maintenance in the Fish Creek Basin area and west bank of the Colville River	Spring breakup - late May, early June through September (end of season)	Approximately 2 people	Helicopter	24	Weekly updates to KSOP, Native Village of Nuiqsut tribal council, City of Nuiqsut,, NSB and others.
Environmental Studies-Wildlife Studies	Wildlife surveys in the northeast NPRA area	May-September	Approximately 4 people	Helicopter	20	Weekly updates to KSOP, Native Village of Nuiqsut tribal council, , NSB and others.
Environmental Studies – Archaeology / Cultural	Cultural resources survey in the Colville River Delta area and areas west and south	June-August	Approximately 2 people	Helicopter	15	Weekly updates to KSOP, Native Village of Nuiqsut tribal council, City of Nuiqsut, , NSB and others.
Environmental Studies - Avian	Avian surveys in the northeast NPRA area	June-August	Approximately 4 people	Helicopter	24	Weekly flight updates to KSOP, Native Village of Nuiqsut tribal council, City of
Environmental Studies - Lakes and Stream Studies	Stream, lake, and fish sampling as needed	June-September	Approximately 4 people	Helicopter	10	Weekly flight updates to KSOP, Native Village of Nuiqsut tribal council, City of

ARGOS Sites	Servicing existing ARGOS weather stations	May-September	Approximately 2 people	Helicopter	10	Weekly flight updates to KSOP, Native Village of Nuiqsut tribal council, City of Nuiqsut, NSB
Lookout 3D Seismic, Overflight / Cleanup	Review of 2015 seismic project, approximately 100 square miles. Will visit camps, tundra damage, scuff and spill locations	July-August	Approximately 4 people	Helicopter	100	Weekly flight updates to KSOP, Native Village of Nuiqsut tribal council, City of Nuiqsut,, NSB and others
GMT-1 and GMT-2 Studies	Potential surveying/engineering site visits related to the potential NPRA Developments	July-August	Approximately 4 people	Helicopter	90	Weekly flight updates to KSOP, Native Village of Nuiqsut tribal council, City of
Site visits and tours, inspections	Agency, Stakeholder, Kuukpik/Native Village of Nuiqsut tribal council, Nuiqsut elders to currently proposed drill sites and other points. (Yet	June-September	Approximately 6 persons	Helicopter	50	Many of these trips may involve local community members. Flights will also be communicated on the weekly updates.
Exploration Studies	Landings to support exploration, well siting, staking, and water sampling	June-September	Approximately 4 people	Helicopter	50	Weekly flight updates to KSOP, Native Village of Nuiqsut tribal council, City of Nuiqsut, NSB
Well Head Inspections	Inspection of Well heads at Cassin, Scout, Lookout, Flat Top, and Rendezvous	May-September	Approximately 6 persons	Helicopter	6	Weekly flight updates to KSOP, Native Village of Nuiqsut tribal council, City of Nuiqsut,, NSB
Total Landings					454	

CPAI does not plan on using any remote field camps or employing remote fuel storage for the proposed activities. CPAI and its contractors will adhere to all applicable stipulations and best management practices for the NPR-A during the performance of all study activities and the applicant would provide weekly updates to the Kuukpik Subsistence Oversight Panel (KSOP), the Native Village of Nuiqsut tribal government, City of Nuiqsut, the North Slope Borough, and other interested agencies and organizations.

Applicable mitigation measures specific to the proposed action:

GMT1 ROD pages 44-46, Subsistence:

- ***Supplemental Best Management Practice 3: Consultation Regarding Aircraft Communication Protocols***

Objective: Ensure that current communication protocols related to helicopter and fixed wing air traffic by the permittee are adequate in addressing Nuiqsut concerns about the impacts of air traffic on their hunting activities.

Requirement/Standard: In consultation with local hunters and local organizations, the permittee will continue to facilitate, improve, and expand communication protocols to inform subsistence users of daily flight patterns and identify potential conflict areas during peak hunting times. This consultation should include efforts to advertise these communication protocols within the community so that a majority of Nuiqsut subsistence harvesters are aware of them, and confirmation that existing minimum altitude requirements are adequate. The consultation results, and any changes to aircraft traffic resulting from the consultation, should be documented, distributed to BLM and other stakeholders.

- ***Supplemental Best Management Practice 4: Aircraft Data Reporting Requirements****

Objective: Gather information on aircraft flight patterns associated with the GMT1 development in the project area.

Requirement/Standard: The permittee will track and record aircraft flight data and provide quarterly reports to BLM in a manner that facilitates meaningful analysis of activities.

The permittee will provide BLM with clear and detailed quarterly flight reports that include the timing, flight path, and purpose of each flight in the project area. The reports will

provide total numbers of flights and document any actual increase in flight traffic once GMT1 is in the construction phase.

The reports will highlight any flights that represent deviations from BLM's best management practice F-1 and include explanations for any deviations. The permittee will provide data related to the altitude of flights.

The format for providing the data to BLM must meet the approval of the Authorized Officer. As the Authorized Officer deems it appropriate, the data reports shall be consistent with standards established by BLM's Assessment, Inventory, and Monitoring program.

- ***Supplemental Best Management Practice 5: Reduce Non-essential Aircraft Traffic***

Objective: To reduce the impacts of helicopter traffic on Nuiqsut subsistence activities.

Requirement/Standard: In ongoing consultation with the City of Nuiqsut, the North Slope Borough Department of Planning, Native Village of Nuiqsut, Kuukpik Corporation, and the Kuukpik Subsistence Oversight Panel, Inc., BLM will establish a time period during peak caribou hunting when non-essential helicopter flights associated with BLM-permitted activities will be suspended near Nuiqsut. Consultation results, including any potential actions to be taken based on the consultation should be documented and distributed to BLM and other stakeholders. Ongoing (multi-year, already planned) scientific /environmental studies that depend on access to study sites could continue if there is no alternative access to sites. These suspension dates can be revised by the Authorized Officer every 3 years upon review of peak caribou season.

The number of takeoffs and landings to support oil and gas operations with necessary materials and supplies shall be limited to the maximum extent possible. Trips shall be combined when possible, and studies shall be conducted by boat and foot when possible.

Additionally, whenever possible, workers traveling by foot or via off-road vehicles equipped with trailers should be used in conjunction with helicopters to travel the ice road routes for cleanup as long as basic safety standards can be met. Exemptions from tundra travel restrictions for this purpose will be granted by BLM.

B. Land Use Plan Conformance

CPAI leases are subject to the Northeast (NE) Supplemental Integrated Activity Plan/Environmental Assessment (SIAP/EIS) (USDOI BLM 2008a) and associated Record of Decision (ROD) (USDOI BLM 2008b) lease stipulations, the Best Management Practices (BMPs) from the NPR-A IAP/EIS (USDOI BLM 2012) and associated ROD (USDOI BLM 2013), the Supplemental EIS for the Alpine Satellite Development Plan for the Proposed Greater Mooses Tooth One Development Project and

associated ROD (USDOI BLM 2015).

The proposed action is in conformance with the NE SIAP/EIS (USDOI BLM 2008a) and associated ROD (USDOI BLM 2008b), the NPR-A IAP/EIS (USDOI BLM 2012) and associated ROD (USDOI BLM 2013), the ASDPGMT1 SEIS (USDOI BLM 2014)) and associated ROD, the Naval Petroleum Reserves Product Act (NPRPA), Federal Land Policy Management Act (FLPMA), Alaska National Interest Lands Conservation Act (ANILCA), Endangered Species Act, Executive Order (EO) 11988, EO 11990, and terms of the federal leases.

GMT1 EIS Section 2.5.5.2 Aircraft Traffic describes aircraft usage for the GMT1 project, which will increase the number of summer take off and landings within the project area.

C. Identify the applicable NEPA document(s) and other related documents that cover the proposed action.

The 2008 (USDOI BLM 2008a), 2012 (USDOI BLM 2012) and 2014 (GMT1 SEIS) EISs and the associated RODs adequately cover all environmental issues associated with the proposed project.

The additional required analyses associated with the EISs are also applicable to the current request:

- Essential Fish Habitat Assessment for the NPR-A IAP/EIS dated November, 2012 and for the ASDP SEIS for GMT1 dated October, 2014.
- Compliance with ANILCA Section 810 Evaluation and Findings for the NPR-A IAP/EIS dated November, 2012 and for the ASDP SEIS for GMT1 dated October, 2014
- Assessment of Archaeological and Historic Resources dated December 6, 2013 and May 13, 2015.
- USFWS issuance of a Biological Opinion for activities within the NPR-A under the Endangered Species Act dated February 5, 2013.
- USFWS issuance of a Biological Opinion on the permitting, construction and operation of GMT1 under the Endangered Species Act dated December 2, 2014.

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

Documentation of answer and explanation:

Yes, the current proposed action was analyzed in the 2008 SIAP/EIS, 2012 IAP/EIS, and 2014 EIS. The 2014 EIS analyzed activity specific to GMT1, while the other documents were focused on the Northeast portion of the NPR-A and the entirety of the NPR-A. CPAI's proposed activities are within the same analysis area considered in these documents.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, resource values, and circumstances?

Documentation of answer and explanation:

Yes. There were a wide range of alternatives contained in all of the referenced NEPA documents. Those resources identified as having potential major impacts resulting from the proposed action were: Sociocultural Systems, Subsistence, and Environmental Justice.

The environmental situation and trends as described in the Affected Environment section of the EISs would continue as described. See Affected Environment section of the EISs for a more detailed profile of the current environmental situation for the issues that were considered to be potentially impacted by the proposed action.

3. Is the existing analysis valid in light of any new information or circumstances (such as, Rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

Documentation of answer and explanation:

Yes. The existing analysis is adequate for this proposal. There is no new information or circumstances since the 2014 ASDP GMT1 SEIS was completed in October 2014.

4. Are the direct, indirect and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Documentation of answer and explanation:

Yes. The direct, indirect and site-specific impacts identified in the EISs are the same as would be anticipated for the proposed action because the proposed activity was analyzed in each of the EISs. The Interdisciplinary Team that reviewed the proposal for the EISs also reviewed the current proposal. The direct, indirect and cumulative effects of the proposed action are similar to those evaluated in the EISs.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequately for the current proposed action?

Documentation of answer and explanation:

Yes. The proposed action will be announced on the BLM Arctic Field Office website NEPA register, as were all of the EISs. The referenced EISs were available for public comment as required by NEPA. Many public comments were received on all of the EISs and these documents are available online at:

www.blm.gov/ak/st/en/prog/planning.html

E. Interdisciplinary Analysis: Identify those team members conducting or participating in the preparation of this worksheet.

<u>Name</u>	<u>Title</u>	<u>Resource Represented</u>
Donna Wixon	Natural Resource Specialist	Project Lead
Dave Yokel	Wildlife Biologist	Wildlife-Mammals, Vegetation
Matthew Whitman	Fisheries Biologist	Fisheries
Richard Kemnitz	Hydrologist	Hydrology
Stacie McIntosh	Supervisory Social Scientist	Archeology
Stacey Fritz	Anthropologist	Subsistence, Sociocultural Systems, Environmental Justice
Debbie Nigro	Wildlife Biologist	Wildlife-Birds and T&E species
Jeanie Cole	Planning & Environmental Coordinator	NEPA

Note: Refer to the EISs for a complete list of the team members participating in the preparation of the original documents.

CONCLUSION

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM’s compliance with the requirements of NEPA.

Note: If one or more of the criteria are not met, a conclusion of conformance and/or NEPA adequacy cannot be made and this box cannot be checked

_____/s/
Donna Wixon, Project Lead, Arctic Field Office

_____/s/
Stacie McIntosh, Manager, Arctic Field Office

May 19, 2015
Date

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM’s internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.

Attachments:

Attachment A – Project Specific Stipulations

Attachment B – Arctic Field Office Standard Terms & Conditions

Attachment C – Legal Description of Project

Attachment A Project Specific Stipulations

This project falls within the constraints of the 2015 United States Fish & Wildlife Programmatic Biological Opinion for the Bureau of Land Management Summer Activities in 2015 in Undeveloped Areas of the National Petroleum Reserve-Alaska. As such the permittee is required:

1. To 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 2015**):

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

2. Permittee must use “bear-resistant” containers that are approved and certified by the Interagency Grizzly Bear Committee as “bear-resistant.” Information about certified containers can be found at <http://www.igbconline.org/html/container.html>.
3. The permittee will abide by the following documents: Required Conduct near Possible Nests of Raptors (Eagles, Hawks and Falcons) in the National Petroleum Reserve-Alaska and Polar Bear Interaction Guidelines.
4. The permittee will follow all Terms and Conditions as stated in the 2015 BLM Summer ESA Programmatic Consultation Biological Opinion.

Some activities of this project are among those considered within the BLM NPR-A Fisheries Monitoring Implementation Plan (Noel et al. 2008) that made recommendations for oil and gas industry requirements in order to assist management and monitoring decisions that aim to protect fish habitat. As such, the permittee is required to do the following as adapted from that plan.

5. The permittee will, when conducting surveys for planned permanent roads, temporary roads (ice roads or snow trails), or pipelines on BLM lands, if any:

- a.) Take photographs looking upstream and downstream at channel crossings.
- b.) Survey a thalweg profile at channel crossings (Approximately 100 yards upstream and 100 yards downstream of crossings for streams about 20 feet wide or less, and approximately 200 yards upstream and 200 yards downstream of crossings for streams greater than 20 feet wide).
- c.) Survey the stream channel cross-section at crossing location.
- d.) Provide planned route in electronic form (ESRI shapefile).
- e.) Provide the above information to the BLM by **December 15, 2015**.

6. The permittee will, when conducting water-source lake studies on BLM lands:

- a.) Collect length data for sensitive fish species (subsample acceptable).
- b.) Photograph inlet and outlet, if discernible.
- c.) Provide a report of all data collected at water-source lakes to the BLM by **December 15, 2015**.

7. Additional Permit Specific Recommendations for Minimizing Impacts to Subsistence Use As indicated by *Supplemental Best Management Practice 5: Reduce Non-essential Aircraft Traffic*, BLM establishes the time period of July 7 through August 7 for the summers seasons 2015-2017 as peak caribou hunting during which non-essential helicopter flights associated with BLM permits will be suspended near Nuiqsut.

- To comply with SBMP 5, all helicopter use permitted by this authorization that is not season-specific (such as certain avian, stream, lake, and fish sampling, wildlife studies) will occur prior to July 7 or after August 7. This would include:
 - Tundra damage assessments
 - Hydrological Monitoring
 -
 - Weather station maintenance
 - Archaeological/Cultural Studies
 - ARGOS sites servicing
 - GMT1 and GMT2 surveying/engineering site visits
 - Lookout 3D Seismic, Overflight/Cleanup
 - Site visits and tours, inspections
 - Exploration Studies
 - Well Head Inspections at Cassin, Scout, Lookout, Flat Top, and Rendezvous
- Essential flights during this suspension period should be concentrated during the Monday-Friday work week. Essential flights during this suspension period should adjust or postpone scheduled activity for 1 or 2 days should reports be made that groups of caribou are near the community and are actively being pursued by local hunters.

Attachment B – Arctic Field Office Summer Standard Terms & Conditions

[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.

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.
- B. Aircraft shall maintain an altitude of at least 1,500 above ground level (AGL) when within ½ mile of cliffs identified as raptor nesting sites from April 15 through August 15 and within ½ mile of known gyrfalcon nest sites from March 15 to August 15, unless doing so would endanger human life or violate safe flying practices. Permittees shall obtain information from BLM necessary to plan flight routes when routes may go near falcon nests.
- 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 Teshekpuk Lake Caribou Habitat Area (Map 2) from May 20 through August 20, unless doing so would endanger human life or violate safe flying practices. Aircraft use (including fixed wing and helicopter) in the Goose Molting Area (Map 2) should be minimized from May 20 through August 20, unless doing so would endanger human life or violate safe flying practices.
- F. Fixed wing aircraft used for permitted activities along the coast shall maintain a minimum altitude of 2,000 feet AGL when within a ½-mile of walrus haulouts, unless doing so would endanger human life or violate safe flying practices. Helicopters used for permitted activities along the coast shall maintain a minimum altitude of 3,000 feet and a 1-mile buffer from walrus haulouts, unless doing so would endanger human life or violate safe flying practices.
- G. Aircraft used for permitted activities along the coast and shore fast ice zone shall maintain a minimum altitude of 3,000 feet when within 1 mile from aggregations of seals, unless doing so would endanger human life or violate safe flying practices.

IV. 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 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.

VIII. STREAMS

- A. All operations shall be conducted with due regard for good resource management and in such a manner as not to block any stream, or drainage system, or change the character or course of a stream, or cause the pollution or siltation of any stream or lake.

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, 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).

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.
- G. With the exception of authorized guide hunting trips, hunting and trapping by permittee's employees, agents, and contractors are prohibited when persons are on "work status." Work status is defined as the period during which an individual is under the control and supervision of an employer. Work status is terminated when the individual's shift ends and he/she returns to a public airport or community (e.g., Fairbanks, Barrow, Nuiqsut, or Deadhorse). Use of permittee facilities, equipment, or transport for personal access or aid in hunting and trapping is prohibited.
- H. Marine vessels used for permitted activities shall maintain a 1-mile buffer from the shore when transiting past an aggregation of seals (primarily spotted seals) using a terrestrial haulout unless doing

so would endanger human life or violate safe boating practices. Marine vessels shall not conduct ballast transfers or discharge any matter into the marine environment within 3 miles of the coast except when necessary for the safe operation of the vessel.

- I. Marine vessels used for permitted activities shall maintain a ½-mile buffer from shore when transiting past an aggregation of walrus using a terrestrial haulout.

Attachment C – Legal Description of Project

MTP #	Township	Range	BLM Managed Land Sections	Non BLM Managed Sections
1	13 North	3 West	25, 26	--
2	13 North	2 West	27-36	--
3	13 North	1 West	13-16, 21-28, 31-36	--
4	13 North	1 East	18-19, 30-36	--
5	13 North	2 East	None	31-36
6	13 North	3 East	None	Water – no land
7	13 North	4 East	None	25-36
8	13 North	5 East	None	1-36
9	13 North	6 East	None	19, 30, 31
10	12 North	3 West	1, 12, 13-16, 21-28, 33-36	--
11	12 North	2 West	1-36	--
12	12 North	1 West	1-36	--
13	12 North	1 East	1-36	--
14	12 North	2 East	13-36	1-12
15	12 North	3 East	None	3-36
16	12 North	4 East	None	1-36
17	12 North	5 East	None	1-36
18	12 North	6 East	None	5-8, 17-20, 29-32
19	11 North	3 West	1-4, 9-16	--
20	11 North	2 West	1-19, 25-29, 33-36	--
21	11 North	1 West	1-36	--
22	11 North	1 East	1-36	--
23	11 North	2 East	1-23, 27-33 (13, 14 & 23 contain regional selection)	24-26, 34-36
24	11 North	3 East	8-10, 14-17, 20-23, 26-36	1-7, 11-13, 18, 19, 24, 25

25	11 North	4 East	31	1-30, 32-36
26	11 North	5 East	None	1-36
27	11 North	6 East	None	5-8, 17-20, 29-32
28	10 North	2 West	1-4, 10-13, 24-36	--
29	10 North	1 West	1-36	--
30	10 North	1 East	1-36	--
31	10 North	2 East	25-27, 34-36 (4, 11-15, 19, 22-24, 28, 30-33 regional selection)	1-3, 5-10, 16-18, 20, 21, 29
32	10 North	3 East	1-36	--
33	10 North	4 East	6, 7, 15-19, 30, 31	1-5, 8-14, 20-29, 32-36
34	10 North	5 East		1-36
35	9 North	2 West	1-36	--
36	9 North	1 West	1-36	--
37	9 North	1 East	1-36	--
38	9 North	2 East	1-36 (excluding land outside NPR-A)	35, 36 (Excluding NPR- A)
39	9 North	3 East	1-36 (excluding land outside NPR-A)	31-33 (Excluding NPR- A)
40	9 North	4 East	Tract B	13, 22-28, 33-36 (Excluding NPR-A)
41	9 North	5 East	Tract B	4,5, 7-9, 17-19 (Excluding NPR-A)
42	8 North	1 West	1-36	--
43	8 North	1 East	1-30	--
44	8 North	2 East	2-11, 15-22 (NPR-A Only)	--