



Environmental Assessment
National Petroleum Reserve-Alaska
Special Recreation Permit
2012
DOI-BLM-LLAK010-2012-0027-EA
Arctic North Guides
Preparing Office: Arctic Field Office

Project Title/Type of Action: **National Petroleum Reserve-Alaska (NPR-A) Special Recreation Permit**

Case File Number: **FF096424**

Land Use Plans: **Northeast National Petroleum Reserve-Alaska Supplemental Integrated Activity Plan/Environmental Impact Statement (IAP/EIS) 2008**
Northwest National Petroleum Reserve-Alaska (IAP/EIS) 2004
Colville River Special Area Management Plan 2008
Western Arctic Resource Management Plan (RMP) evaluated 1990
Utility Corridor Resource Management Plan (RMP) 1991
Utility Corridor Final Environmental Impact Statement (FEIS) 1989

Applicant: **David P Byrd/Fred S Tuttle**
DBA: Arctic North Guides LLC

Address: **P.O. Box 34**
King Salmon, Alaska 99613

Date: **July 23, 2012**

Lands Involved: State of Alaska GMU 26-8, 26-9 & 26-11 (See Figure 1)
Glossary/Acronyms

AAC.....	Alaska Administrative Code
ACEC.....	Area of Critical Environmental Concern
ADFG/ADF&G	Alaska Department of Fish and Game
AFO.....	Arctic Field Office
ANILCA.....	The Alaska National Interest Lands Conservation Act passed in 1980, modified and established designation of federal lands in Alaska for conservation and wilderness. These lands are managed by the National Park Service, US Fish and Wildlife Service, and US Forest Service.
BLM.....	Bureau of Land Management
EA.....	Environmental Assessment
EFH.....	Essential Fish Habitat
EIS.....	Environmental Impact Statement
EO.....	Executive Order
ESA.....	Endangered Species Act
FLPMA.....	The Federal Land Policy And Management Act of 1976 is a Public Law 94-579 passed by Congress October 21, 1976 that gave direction to the way in which the public lands administered by the Bureau of Land Management are managed.
IAP.....	Integrated Activity Plan
ITRs.....	Incidental Take Regulations
LOA.....	Letter of Authorization
MMPA.....	Marine Mammal Protection Act of 1972
NEPA.....	National Environmental Policy Act. This law, passed in 1969, went into effect on January 1, 1970. It requires all Federal Agencies to disclose the environmental effects of their actions.
NHPA.....	National Historic Preservation Act of 1966
NPR-A.....	National Petroleum Reserve Alaska, formally named The Naval Petroleum Reserve #4(NPR-4) is an area of more than 23 million acres in the northernmost part of Alaska, and was established by executive order on February 27, 1923.
NPRPA.....	The Naval Petroleum Reserves Production Act of 1976 (PL 94-258), dated April 5, 1976, transferred jurisdiction of NPR-4 to the Secretary of the Interior and renamed it the NPR-A. This act authorized the Secretary to begin further petroleum exploration and closed the NPR-A to all forms of appropriation under the public land laws, including mining and mineral leasing laws.
NPR-4.....	The Naval Petroleum Reserve No. 4 was established by Executive Order 3797, dated February 27, 1923.
NSB.....	North Slope Borough
ROD.....	Record of Decision
ROP.....	Required Operating Procedure
USFWS (FWS)	United States Fish & Wildlife Service
USGS.....	United States Geological Survey

1.2 Purpose of Action

The purpose for action is to provide access and use of public lands within 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.

1.2 Laws, Regulations, other NEPA That Influence This EA

This EA will be based on the findings, management controls, and protective measures of the 2004 Northwest NPR-A Integrated Activity Plan (IAP)/EIS Record of Decision (ROD), the 2008 Northeast NPR-A Supplemental IAP/EIS ROD, and the 2008 Colville River Special Area Management Plan (CRSAMP), Western Arctic Resource Management Plan (RMP) evaluated 1990, the 1991 Utility Corridor Resource Management Plan (RMP), 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.

The proposed action is in conformance with the Northwest IAP/EIS, associated ROD, the Northeast SIAP/EIS, associated ROD, the CRSAMP, associated ROD, the Western Arctic RMP, the Utility Corridor RMP & FEIS and associated RODs, 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 The Decision to be Made

The BLM must conduct a project-specific NEPA analysis and determine whether the proposed project should be approved, rejected, or approved with modifications, and if additional mitigation is needed. This EA will be based on the findings, management controls, and protective measures of the 2008 Northeast NPR-A SIAP/EIS ROD, 2004 Northwest NPR-A IAP/EIS ROD, 2008 CRSAMP ROD, 1990 Western Arctic RMP, 1989 & 1991 Utility Corridor RODs as well as other laws and regulations. The scope of this EA includes analysis that enables the BLM to select among alternatives that meet the purpose and need, and are within the BLM's jurisdiction (40 Code of Federal Regulations 1506.1(a) (2)).

This Environmental Assessment (EA) has been prepared to meet requirements of the National Environmental Policy Act (NEPA), and to support U.S. Department of Interior (USDOI) Bureau of Land Management (BLM) decision-making on permits required to construct and implement the proposed projects. The scope of this EA includes analysis of the effects of the proposed activity and alternatives.

1.5 Scoping and Issues

The proposed action has been announced on the BLM Arctic Field Office website NEPA register May 22, 2012. To date no comments have been received. Development of the 2008 NE SIAP/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, (BLM 2008a & BLM 2008b). 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

Resources/Environmental Considerations for Issues and Analysis	Determination	Basis of Determination (See Note)
ACEC's	Not Present	Protection provided by:
Air Quality	Minimally Impacted	Protection provided by: State of Alaska Air Non-Point and Mobile Program and regulations (18 AAC 50)
Cultural and Paleontological Resources	Minimally Impacted	Protection provided by: Section 106 of the National Historic Preservation Act, Non Oil & Gas Stipulations VA, VB, VC.
Environmental Justice	Minimally Impacted	Protection provided by: EO 12898
Fish	Minimally Impacted	Protections provided by: Non-Oil & Gas Permit Stipulations IIA, IIB, VIIC, VIIIA, XIC. EFH finding "not likely to adversely affect".
Flood Plains/Wetlands and Riparian Zones	Minimally Impacted	Protections provided by: EO 11988 and EO 11990
Invasive, Non-native species	Not Present	Protections provided by: not applicable to this action
Native American Religious Concerns	Minimally Impacted	Protection provided by: Native American Religious Freedom Act
Recreation	Minimally Impacted	Protection provided by: Permit Stipulations IIB, III, VIIIA, X, XI
Social cultural Systems	No Impact	
Subsistence	Minimally Impacted	Protection provided by: ANILCA, Non Oil and Gas Permit Stipulations IXA
Threatened & Endangered Species Spectacled and Steller's eider	Minimally impacted	Protection provided by Section 7 of the Endangered Species Act. (J)
Threatened & Endangered Species Polar Bear	Minimally impacted	In accordance with Section 7 of the Endangered Species Act of 1973, as amended (ESA),
non-T&E birds	Minimally impacted	Protection provided Non Oil and Gas Permit Stipulations III.D & E VIII, XI.B.1-3, XII.A-C

Resources/Environmental Considerations for Issues and Analysis	Determination	Basis of Determination (See Note)
non-T&E mammals	Minimally Impacted	Protection provided by Non Oil and Gas Permit Stipulations III.A, III.E, IIIF, XI.B.1, XII.A&B.
Vegetation	Minimally Impacted	Protections provided by: Non Oil and Gas Permit Stipulation X.A.
Visual Resource Management	Minimally Impacted	Protection provided by: VII A, XA, XI A,B
Water Resources	Minimally Impacted	Protections provided by: Non Oil and Gas Permit Stipulation II.
Waste (Hazardous/Solid)	Minimally Impacted	Protections provided Non Oil and Gas Permit Stipulations in Sec. XI, and by State of Alaska 18 AAC 30, 60, 62, 63, 72, and 75;
Wild & Scenic Rivers	Not Present	
Wilderness	Minimally Impacted	Protection provided by: Permit Stipulations IIB, III, VIIIA, X, XI

Key to Table 1.2:

AAC- Alaska Administrative Code
 ACEC- Area of Critical Environmental Concern
 ADFG- Alaska Department of Fish and Game
 ANILCA- Alaska National Interest Lands Conservation Act
 BLM – Bureau of Land Management

EO- Executive Order
 EPA- Environmental Protection Agency
 ESA- Endangered Species Act
 NPDES- National Pollutant Discharge Elimination System
 ROP- Required Operating Procedure

EFH – Essential Fish Habitat

SPCC- Spill Prevention Control and Countermeasures

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., ROPs and Stipulations from overriding BLM plans or other legal protections) would reduce impacts. Minimally impacted resources or issues will 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 will not be analyzed further in the EA.

Note1: Determination tiered from: NE 2008 & NW 2004, Colville River Special Management Plan, Western Arctic RMP, Utility Corridor RMP

In summary, 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.

1.6 Public Involvement

Development of the 2004 Northwest IAP/EIS, 2008 SIAP/EIS, and CRSAMP involved extensive input from other Federal agencies, the State, the NSB, thousands of individuals, and many institutions. A number of permits and approvals are required to work in the NPR-A. These are described in the 2004 Northwest IAP/EIS and 2008 Northwest SIAP/EIS many of which are available for public review prior to agency decision-making.

Public notification of the Environmental analysis was announced in the NEPA register on file at the Arctic Field Office Environmental Assessment web site beginning May 22, 2012. No public comments or inquiries were received through 24 July, 2012.

Chapter 2 Alternatives Including the Proposed Action

2.1 Introduction

This section describes the alternatives considered, including the no action, proposed action, and alternatives considered an eliminated.

2.2 Description of Alternatives

2.2.1 Alternative A: No Action

Under no action, the BLM would not grant a special recreation permit to ANG. The current land management situation would continue. Chapter III (Affected Environment) of the Northwest NPRA AIP/EIS, Northwest NPRA SAIP/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 ANG would not be provided.

2.2.2 Alternative B: Proposed Action

The proposed action is to authorize a Special Recreation Permit that would allow ANG to conduct guided hunts on BLM managed lands within GUA 26-08, 26-09, and 26-11. ANG would guide their clients for the big game species of caribou, sheep and brown bear. The applicant proposes to have a spike camp at each of the following locations:

May Creek N68° 27' 454" W150° 03' 496"

Section 10, Township 10 South, Range 8 East, Umiat Meridian (three clients)

Iteriak Creek N68° 18' 025" W155° 44' 459"

Section 33, Township 34 North, Range 13 East, Kateel River Meridian (four clients)

Nigu River N68° 17' 168" W156° 23' 640"

Section 21, Township 34 North, Range 10 East, Kateel River Meridian (five clients)

Transportation to and from the spike camps would be via fixed wing aircraft using two supercub planes. They propose to use pit toilets for human waste and all other waste would be flown out. The only fuel storage would be one pound propane cooking fuel containers. The camp would consist of four season tents.

Each camp would be equipped with a satellite phone and a hand held air craft radio. Clients would be instructed of the safety plan and guides would have the phone numbers of the Alaska State Troopers, the National Guard and Barrow Search and Rescue. Every guide has completed first aid training to include CPR. The maximum number of guides on site would be three. ANG is also requesting an SRP from the Anchorage Field Office to conduct guided hunts. This is their first year of operating on BLM Alaska lands.

Chapter 3 Affected Environment

Environmental characteristics of the general project area have been extensively described in the 2004 Northwest NPR-A IAP/EIS (Vol. 1, Chapter 3), the 2008 NE NPR-A SIAP/EIS (Vol 1 Chap 3), the 2008 CRSAMP (Chapter3), the Western Arctic Resource Management Plan (RMP) evaluated 1990, the 1991 Utility Corridor Resource Management Plan (RMP), the 1989 Utility Corridor Final Environmental Impact Statement (FEIS) to which this analysis is tiered. No issues were identified as needing further analysis in Section 1.5.

Chapter 4 Environmental Impacts

The following analysis will focus on impacts due to the proposed action and no action alternatives. Additional details on related impacts are discussed in the respective EIS/IAPs for Northwest and Northeast NPR-A the Western Arctic RMP, the Utility Corridor RMP & FEIS and CRSAMP, and the analyses from those documents are incorporated by reference.

The proposed action is similar to activities analyzed in previous NEPA documents (i.e., the Northwest and Northeast NPR-A IAP/EISs, Western Arctic RMP, Utility Corridor RMP & FEIS). And protections from recreational impacts were incorporated into the Colville River Special Area Management Plan (CRSAMP) and its associated EA (BLM 2008b).This EA will

focus on project specific and site specific impacts of the proposed action and no action alternatives.

4.1 Direct and Indirect Effects

Analysis of impacts from the proposed action and no action alternative is based on observations and information gained from decades of similar operations on the North Slope. This EA is tiered from the 2004 Northwest IAP/EIS, the 2008 NE NPR-A SIAP/EIS, Western Arctic RMP, the Utility Corridor RMP & FEIS, the CRSAMP and their respective RODs. Related discussions of impacts are found in: 2004 Northwest NPR-A IAP/EIS, Vol. 2, Chapter 4.6 (Environmental Consequences of Alternative D, the preferred alternative) and 2008 Northeast NPR-A SIAP/EIS, Section 4.6.16 and are incorporated by reference. Activities such as those associate by SRPs (recreational camps, humans on foot) are identified as potentially disturbing to wildlife or subsistence resources and uses (BLM and MMS 2003, BLM 2008a). The effects are generally short term and localized (BLM and MMS 2003, BLM 2008a). BLM resource specialists have not identified issues for further evaluation in this EA. Activity such as guided hunting were analyzed in the plans from which this EA is tiered.

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 NPR-A portion of the project area is 1977 (designation of NPR-A) to 10 years into the future, assuming that the relatively low level of activity and management would remain at about the same level as present. Due to the limited scope and intensity of the proposed action the geographic area would be limited within 1 mile of the proposed river travel corridor, camps, and staging areas. 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.

4.4 Mitigation and Monitoring

The terms and conditions that will be attached to the permit are: the Arctic Field Office standard stipulations (Appendix A) 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.”

4.5 Summary of Environmental Consequences

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.

Chapter 5 Consultation and Coordination

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

BLM

Arctic Field Office:

Dave Yokel, Wildlife Biologist
Michael Kunz, Archaeologist
Susan Flora, Environmental Scientist
Richard Kemnitz, Hydrologist
Donna Wixon, Natural Resource Specialist
Debbie Nigro, Wildlife Biologist
Matthew Whitman, Fisheries Biologist
Stacey Fritz, Anthropologist/Subsistence Specialist
Roger Sayre, NEPA Specialist

Bibliography

Bureau of Land Management and Minerals Management Service (BLM and MMS). 2003. Northwest Petroleum Reserve-Alaska Integrated Activity Plan/Environmental Impact Statement

Bureau of Land Management (BLM). 2008a. Northeast Petroleum Reserve-Alaska Integrated Activity Plan/Environmental Impact Statement

Bureau of Land Management (BLM). 2008b. Colville River Special Area Management Plan and Environmental Assessment. BLM Arctic Field Office, Fairbanks, Alaska.

Appendix A Stipulations

ARCTIC FIELD OFFICE NON OIL AND GAS PERMIT STIPULATIONS

[This is a subset of the Northeast National Petroleum Reserve-Alaska Supplemental Integrated Activity Plan/ Final Environmental Impact Statement Record of Decision Required Operating Procedures, the Northwest National Petroleum Reserve-Alaska Integrated Activity Plan/ Final Environmental Impact Statement Record of Decision Required Operating Procedures, Utility Corridor Resource Management Plan/Final Environmental Impact Statement, The Colville River Special Area Management Plan, and the Final Environmental Impact Statement on Oil and Gas Leasing in The National Petroleum Reserve in Alaska and Record of Decision approved 5/1983. 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 begin to run as an aircraft approaches, the aircraft is too close and must break away.

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- 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, especially rotary wing aircraft, near known subsistence camps and cabins or during sensitive subsistence hunting periods (spring goose hunting and fall caribou and moose hunting) should be kept to a minimum.

E. NORTHEAST SPECIFIC

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 1) 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. NORTHWEST SPECIFIC

1. Aircraft used for permitted activities shall maintain an altitude of at least 2,000 ft AGL (except for takeoffs and landings) over the Caribou Study Area (Map 91) from June 15 through July 31, unless doing so would endanger human life or violate safe flying practices.
2. Aircraft shall maintain an altitude of at least 2,000 ft AGL (except for takeoffs and landings) over the Caribou Coastal Insect-Relief Areas (Map 91) from June 15 through July 31, unless doing so would endanger human life or violate safe flying practices.

G. SOUTH SPECIFIC

Aircraft shall maintain an altitude of at least 2,000 ft AGL (except for takeoffs and landings) over groups of caribou 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. 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 camped at each site, and GPS location (with datum noted).
- C. Camps will be situated on gravel bars, sand, or other durable lands.

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 allowing an examination by BLM cultural or paleontological specialists.

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 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.

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 or bare ground.
3. Recommended human excreta disposal in riparian areas: Packing out human wastes is the most eco-friendly means of 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, Susan Flora (work/message 907-474-2303). 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 Concerns (ADEC),(1800-478-9300) (Alaska Statute Title 18, Chapter 75, Article 2).
3. State and Federal safety standards for fuel handling will be followed.
4. All fuel containers, including barrels and propane tanks, shall be marked with Permittee's name, product type, and year filled or purchased (e.g. company Name, Fuel Type, 1993).

D. PESTICIDES

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

XII. WILDLIFE

- A. Chasing wildlife with ground vehicles is prohibited. Particular attention will be given to avoid disturbing caribou.
- B. The feeding of wildlife is prohibited.
- C. Camp sites shall be located at least 500 meters from any known arctic peregrine falcon nest site.

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
COMMERCIAL LAND-BASED
SPECIAL RECREATION PERMIT STIPULATIONS

Name of Company: Arctic North Guides LLC.

Special Recreation Permit Number: FF096424

SRP Valid from: July 24, 2012- July 24, 2013

Activities authorized by this SRP: Guided Hunting

Pre-trip Itineraries Required? No

Post Use Report Due: October 15, 2012

Minimum Insurance Requirements: \$300,000

Fee formula: Greater of \$100 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 November 15th, 2011. 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.