Ambler Access Project

Management Plans and Standard Operating Procedures

June 2024

LIST OF POLICIES AND PROCEDURES

1. Caribou Policy
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3. Wildlife Policy and Wildlife Incident SOP
4. Security and Controlled Access
5. Spill Report Card (to be developed)
6. Maintenance and Monitoring Report (to be developed)

Ambler Access Project

Caribou Policy

Revision History		
Date	**Description**	**Notes**
2/9/24	Initial Draft	Developed by AIDEA

Caribou Policy

1. PURPOSE AND SCOPE

Caribou are a major element of the subsistence culture in Alaska and the AAP region. As a visitor to this region, the Ambler Access Project (commonly referred to as the “Ambler Road”) will follow this policy to ensure that the AAP road traffic does not adversely affect caribou migration and movement, grazing ability, reproduction, or the overall health of the caribou within the Region. Due to the importance of the species, caribou near the Ambler Road always have the right-of-way.

2. PROCEDURE

The following sections describe actions employees and contractors shall take to minimize disturbance to caribou.

2.1 Migration

Caribou migration through the project corridor is most likely to occur in the fall and winter. Every effort will be made to ensure that caribou are not disturbed when crossing the Ambler Road during migration or any other time of the year. If caribou are observed on or near the road, this procedure will be followed to ensure that caribou are not disturbed when crossing the Ambler Road.

When migrating caribou are observed by any person on the road, that person shall notify the AAP Program Manager of the migrating animals' location. The notifying individual will also notify all other road traffic on the road communications channel of the crossing and caribou's location.

When caribou are on or approaching the road, all vehicles must come to a complete stop when in sight of the crossing locations. Traffic shall not proceed until the group of animals has crossed and continued at least 300 feet from the road.

Employees and contractors will fill out and submit a caribou report card whenever vehicles are stopped for more than 15 minutes on the road due to caribou crossing the road. When multiple vehicles are stopped at the same time for the caribou crossing, only the first vehicle that stops for the caribou crossing must fill out and submit the caribou report card. Caribou report cards are available from the AAP Program Manager and should be returned to the AAP Program Manager at the end of their shift.

2.2 Grazing

Caribou actively grazing or resting near or on road shall be afforded the right-of-way. If the animal does not leave the road after 15 minutes, notification shall be made to the AAP Program Manager and the AAP Hazing Procedure should be followed.

2.3 Emergency Traffic

In the event of emergency vehicle traffic along the road, right-of-way shall still be afforded to any caribou on the roadway, however caution shall be taken to expeditiously haze the animal, encouraging its movement away from the road.

3. KEY RESPONSIBILITIES

All employees and contractors using the Ambler Road should be familiar with this policy. The AAP Program Manager makes the decision on road closure and reopening in response to caribou.

4. DEPARTURE FROM PROCEDURE

This policy was written to reduce or eliminate adverse impacts on caribou and allow for the unimpeded movement of caribou with the AAP private industrial access road. Failure to follow this procedure could result in stress to caribou or delays in the migration of caribou. Departure from this procedure may also result in adverse effects on corporate performance, reputation and disciplinary actions including termination of contract or employment.

5. HUNTING AND SHOOTING FROM THE ROAD

Hunting and fishing by employees and contractors associated with AAP will not be allowed on or within the AAP Road Corridor. This policy will be strictly enforced.

6. GENERAL REQUIREMENTS

All individuals using the AAP road or corridor shall be trained in the requirements of this policy.

This policy shall be posted and made available to any individuals using the road or corridor.

7. REFERENCED DOCUMENTS

- AAP Road Traffic SOP
- AAP Road Caribou Card
- AAP Road Wildlife Incident SOP
- AAP Road Hazing Policy (to be developed)

Ambler Access Project

Caribou Report Card

Revision History		
Date	**Description**	**Notes**
2/9/24	Initial Draft	Developed by AIDEA

Caribou Report Card

Ambler Road Caribou Card = Submit completed sheets to _____

Name: _____
Vehicle Number: _____
LOCATION/Mile Marker: _____

Number of Vehicles Stopped Behind You
- #Concentrate Trucks _____
- #Light Vehicles _____
- #Freight Trucks _____
- #Fuel Trucks _____
- #Surface Crew Equipment _____

Number Vehicle Stopped on Opposite Side of Road
- #Concentrate Trucks _____
- #Light Vehicles _____
- #Freight Trucks _____
- #Fuel Trucks _____
- #Surface Crew Equipment _____

Did all vehicles stop for caribou, or did some continue?
- ☐ Yes, all vehicles stopped
- ☐ No, some vehicles did not stop for the caribou

Caribou Location (check more than one if applicable)
- ☐ On the road
- ☐ On North side of road
- ☐ On South side of road
- ☐ On Both sides of road

Estimated Distance of Caribou from Road
(note 100 feet is approx. length of a concentrate truck)
- ☐ ~100 feet
- ☐ ~300 feet
- ☐ ~600 feet

Estimated Number of Caribou
- ☐ 1-2
- ☐ 3-10
- ☐ 11-25
- ☐ 26-50
- ☐ 51-100
- ☐ 101-500
- ☐ 501-1000
- ☐ >1000

Loud Noises Heard While Stopped
- ☐ Blasting
- ☐ ATVs
- ☐ Gunshots
- ☐ Human Voices
- ☐ Equipment operating

Additional Observation: feel free to use other side!

Direction of Herd Movement
- ☐ Stationary
- ☐ Generally moving towards Upper Kobuk Communities
- ☐ Generally moving towards Kotzebue
- ☐ Generally moving south east (Hughes/Huslia)
- ☐ Generally moving South east (Allakeket/Alatna)

Caribou Behavior (check all that apply)
- ☐ Resting – sitting down
- ☐ Grazing
- ☐ Head down
- ☐ Head up
- ☐ Alert
- ☐ Moving slow (walking)
- ☐ Moving quickly (trotting)
- ☐ Moving fast (running)

Did Road Traffic Influence Herd Movement?
- ☐ Yes
- ☐ No
- ☐ Not applicable – herd was stationary

Predators Visible (check all that apply)
- ☐ Wolf
- ☐ Bears
- ☐ Other Predator: _____

Low Flying Aircraft Present Overhead?
- ☐ Helicopter
- ☐ Fixed Wing Aircraft – Propeller
- ☐ Fixed Wing Aircraft – Jet

Ambler Access Project

Wildlife Policy
and
Wildlife Incident SOP

Revision History		
Date	**Description**	**Notes**
5/9/24	Initial Draft	Developed by AIDEA
6/5/24	Updated Draft	

Wildlife Policy

1. PURPOSE AND SCOPE

AIDEA and the Ambler Access Project (AAP) Team recognizes and values the importance of subsistence to Alaska Native communities and culture. As a visitor to this region and as the conservator of the lands where it operates, the Ambler Access Project (commonly referred to as the "Ambler Road) is committed to protecting the environment, the people, and the wildlife in the region and seeking ways to reduce the impacts of its operations. All AAP employees and contractors are required to follow this Wildlife Policy to ensure that the construction and use of the AAP road does not adversely affect wildlife populations, migration, reproduction, and their overall health.

This policy is not merely a document; it is a pledge—a pledge to preserve and protect wildlife in the AAP region for generations to come. This policy demonstrates the AAP's stewardship responsibilities and a reflection of the project's commitment to sustainable development.

2. ROLES & RESPONSIBILITIES

The potential for wildlife interactions and impacts due to AAP activities exists even if all practicable precautions are taken to eliminate attractants and reduce interactions. In these situations, personnel safety is the primary concern. For this reason, avoidance of any activities that increase the potential for wildlife interactions and conflict is necessary. The following sections describe actions employees and contractors shall take to minimize disturbance to caribou.

2.1 General Policies & Procedures

All AAP employees and contractors are required to:

1. Be alert for wildlife.
2. Communicate wildlife observations, as well as potential attractants such as animal carcasses or garbage, to other personnel in the project area.
3. Report all wildlife related incidents immediately.
4. Not approach wildlife.
5. Never intentionally or unintentionally feed wildlife.
6. Personnel are prohibited from hunting, trapping, or fishing in the project area.
7. Be vigilant and always look around before leaving a vehicle.
8. Be cautious when working outside during evening hours and times with reduced visibility
9. Drive carefully—wildlife ALWAYS have the right-of-way.

2.2 Stop Work Authority

AAP employees and contractors must comply with this Policy. All AAP employees and contractors have the authority to stop work if issues or challenges are observed.

2.3 Speed Limits and Driving at Night or During Periods of Reduced Visibility

To avoid collisions with wildlife and to promote road safety, drivers must always obey posted speed limits within the project area.

- Within the AAP, vehicles must not exceed 45 miles per hour, regardless of vehicle type.
- Fox, birds, and other wildlife can unexpectedly dart across roads. Drivers should be aware of this potential hazard throughout the year and drive defensively and according to the speed limit to protect themselves and the wildlife species.
- Many vehicle-wildlife collisions occur when it is dark. Weather conditions that reduce visibility and terrain that reduces visibility are also associated with a large fraction of wildlife collisions. All AAP employees and contractors need to be alert, reduce speeds, and use caution while driving under these circumstances.
- Vehicle headlights are to be on at all times. High beams may be used to improve visibility on and adjacent to the road, but low beams should be used if there is oncoming traffic. When caribou or other wildlife are known to be present in the Project Area, vehicles will reduce speeds to account for darkness and limited visibility to avoid collisions with animals.

2.4 Emergency Traffic

It is critical that AAP avoids disturbance of caribou, particularly during migration, grazing, or calving. If an emergency occurs while the road is closed due to the presence of wildlife, emergency response personnel may still proceed along the access road to address an ongoing designated emergency. The AAP Project Manager, or their designee, must designate these official trips during wildlife road closures. This designation must be obtained prior to the trip. An incident report will be completed and reviewed by emergency personnel after each designation of an emergency trip.

3. PROCEDUREES FOR WILDLIFE INTERACTIONS

Many different types of wildlife interactions may occur within the AAP area. The applicable procedures depend on the specific circumstances of the interaction or incident. The following sections provide details for handling various types of wildlife interactions.

3.1 Wildlife is Accidentally Killed

A. AAP staff and contractors will notify all appropriate individuals and agencies in the event that any wildlife species is accidentally killed to initiate and incident report.

B. The following agencies will be notified immediately:

i. ADF&G in Kotzebue at 907-442-3420 for accidental wildlife deaths.

ii. The Alaska Wildlife Trooper – Kotzebue Office at 907-442-3241 for accidental moose, caribou, or muskox deaths. Troopers may be notified of other animal deaths at the discretion of the AAP Project Manager or their designee.

iii. The US Fish and Wildlife Service (USFWS) will be notified of accidental deaths of a caribou or migratory birds.

iv. The NPS will be notified of any accidental deaths of any large mammals or migratory birds for portions of the AAP in the Gates of the Arctic National Park.

C. To avoid attracting predators to facilities or roads, non-salvageable carcass parts should be removed from the road right of way by moving it (by hand or helicopter) out onto native tundra and left for consumption by scavengers. These parts should not be moved to any area within 200 feet of ponds, streams, or rivers. This includes frozen waterbodies. If it is not practical to relocate the carcass

3.2 Foxes and Rabies

A. Rabies is present in arctic and red fox of the region. In some years, it is more prevalent than others. Since fox are opportunistic foragers, the feeding of fox is not allowed anywhere in the Project Area as it increases bite risks and exposure to rabies.

B. Unusual fox behavior that may be indicative of rabies includes any of the following:

i. Demonstrating no fear of humans

ii. Staggering, tremors, or uncoordinated movements

iii. Nipping or biting at themselves or random objects

iv. Acting seemingly unaware or blind

v. Acting lethargic or reluctant to move

C. If a fox is behaving sick/abnormal but has not bitten anyone, contact ADF&G.

D. Under the Alaska Public Health Regulations, reports of foxes that have bitten or potentially exposed a person to rabies must be made immediately to the Department of Health and Social Services (DHSS) Section of Epidemiology (907) 269-8000, 1-800-418-0054 in Anchorage, AK.

i. On the direction from the DHSS, carcasses of canids (foxes, wolves, coyotes) that have bitten a person may be shipped to the Alaska State Virology Lab with the forms found under Appendix C at: http://dhss.alaska.gov/dph/Epi/id/Pages/rabies/default.aspx or to ADF&G.

ii. Canids that have bitten someone should not be shot in the head since a negative confirmation will be impossible. When canids that are found dead or were killed after exhibiting signs of illness or strange behavior but no

human exposure to saliva/brain tissues, contact Dr. Kimberlee Beckmen at ADF&G (907-328-8354; email: dfg.dwc.vet@alaska.gov). Carcass submission forms for found dead wildlife are found at: www.adfg.alaska.gov/index.cfm?adfg=disease.main. Please do not freeze carcasses; keep them chilled until directed on shipping or disposal.

3.3 Hazing of Wildlife

A. Ambler Road will obtain a Public Safety Permit issued by ADF&G outlining the conditions under which we are permitted to haze wildlife. The important thing to remember is that only persons who have completed the Wildlife Hazard Management training put on by the USDA can perform hazing activities. These individuals are listed in the permit and a list is kept with the permit at the AIDEA head office.

B. A copy of the Public Safety Permit must be with the person performing the hazing. They are kept in the glove compartments of the Safety and Health vehicles.

C. All hazing activities must be documented in daily reports and the reporting database. An annual report summarizing these activities is submitted by the Environmental Technical Supervisor to ADEC each January before a new permit will be issued.

D. Permitted, non-lethal hazing techniques are specified in the permit. These are the only methods allowed without additional special permission from ADF&G.

E. The justifications for hazing are:

   i. To assure safe aircraft landings and take-offs are not compromised by wildlife on or near the airfield.

   ii. To protect people from being harmed by confrontation with wildlife.

   iii. To protect property from wildlife damage.

4. SPECIES SPECIFIC RULES

4.1 Big Game/Large Mammals

A. <u>Action Distances</u>

1. When large mammals are on or approaching a road, all vehicles must come to a complete stop when the crossing location is visible. Traffic shall not proceed through the area until 1) the group of animals has crossed and have continued beyond the road by at least 300 feet or 2) the animals have withdrawn from the road and are located more than 300 feet away from the road and are showing no signs of trying to cross.

2. Employees and contractors will fill out and submit a caribou card as required under the Caribou Policy.

B. <u>Aircraft (fixed-wing and helicopters)</u>

1. It is recommended that the permittee utilize mitigation measures during air transports that avoid or minimize disrupting large mammals and birds and their movement, including but not limited to, as safety permits, driving or flying around herds or flocks, driving or flying at distances or altitudes high enough to reduce noise and disturbances,

limiting the number of trips or flights per day, parking or landing away from migration routes, or temporarily suspending transport operations.

2. To minimize disturbance to wildlife during air transport, the aircraft must maintain a minimum altitude of 2,000 feet above ground level except as required for takeoff, landing, emergency and/or weather. Takeoff, landing and transport dropoffs should avoid proximity to any large mammals.
3. When wildlife is spotted, pilots are requested to maintain a wide berth and maneuver so as not to interfere with wildlife migration or movement.
4. Pilots are required to report any instance where caribou and Dall sheep appear to be injured while fleeing aircraft.

4.2 Migratory Birds

A. Action Distances

It is illegal to harm, harass, injury or kill migratory birds, including active nests. To avoid the taking of Migratory Bird Treaty Act (MBTA) species during the nesting season, surface construction crews will only conduct land disturbing activities (e.g., tree and vegetation clearing, excavation, gravel fill, brush hogging, etc.) before or after the breeding season (May 1 – July 31; https://www.fws.gov/alaska-bird-nesting-season) unless a MBTA breeding bird clearance survey is conducted. Breeding bird surveys will be conducted during the breeding season to identify active nests within areas of disturbance in areas that are not already disturbed. If active nests are found at any time, a 200-foot buffer will be established around the nest until the Environmental staff can coordinate with the USFWS Office of Migratory Bird Management (OMBM) regarding best practices. The AAP will report incidents that result in mortality of MBTA species to the USFWS.

4.3 Golden Eagles and Nests

A. Action Distances

If surface construction disturbances, including blasting, jackhammering, or pile-driving, cannot be timed to occur outside the eagle nesting season (March 1 – August 31), the USFWS recommends golden eagle and/or bald eagle nest surveys within a half-mile of the Project footprint, including cliffs of tributary streams, to determine if and where eagles may be nesting. If an active eagle nest is discovered within a half-mile of surface construction activities, AAEP will contact the USFWS for additional guidance. Additional information can also be found at the USFWS Alaska webpage for Bald Eagle Nesting and Sensitivity to Human Activity (Bald Eagle Nesting & Sensitivity to Human Activity | U.S. Fish & Wildlife Service (fws.gov)).

4.4 Raptors

A. Action Distances

Raptors, including eagles, hawks, falcons, and owls, are protected and may begin breeding as early as March or April. A nesting raptor survey will be required prior to any significant road construction. The USFWS timing window for nesting raptors is March 1 through August 31.

B. Aircraft (fixed-wing and helicopter)

Helicopters are commonly used to conduct surveys for active raptor nests. Pilots may approach the nest while a field staff inspects if a nest is active and what species is nesting. The location of the raptor nest will be recorded, and the area will be avoided for the remainder of the breeding season. The helicopter must immediately increase the distance from an active nest if the raptor shows signs of distress (hunkering down over eggs, flying away from nest). To minimize disturbance of confirmed raptor nests during air transport, the aircraft must maintain a minimum altitude of 2,000 feet above ground level except as required for takeoff, landing, emergency and/or weather.

5. DEPARTURE FROM POLICY/PROCEDURE

This policy was written to reduce or eliminate adverse impacts on caribou and allow for the unimpeded movement of wildlife with the AAP access road. Failure to follow this procedure could result in stress to caribou or delays in the migration of caribou. Departure from this procedure may also result in adverse effects on corporate performance and reputation.

6. KEY DOCUMENTS, TOOLS, & REFERENCES

AAP Caribou Policy

AAP Caribou Report Card

Title 5, Alaska Administrative Code Chapter 92, Fish and Game

Ambler Access Project

Security and Controlled Access SOP

Revision History		
Date	**Description**	**Notes**
2/9/24	Initial Draft	Developed by AIDEA
6/5/24	Updated Draft	

Security and Controlled Access Policy

1. PURPOSE AND SCOPE

The AAP road is a controlled private access industrial road. Road restrictions and access are controlled according to land owner agreements and the Right-of-Way (ROW) Permits and Grants. The Gates of the Arctic National Park and Preserve (Permit RW GAAR-21-001) requires the road to be a “private industrial access road” (pg 4 of 9) and the BLM ROW grant has similar restrictions. This Policy provides the procedures and requirements that shall be followed for controlling the access to and along the road. Access control also ensures the safety of road users and the integrity of the region, its wildlife and environment. Gatehouses for the road will potentially be provided at multiple points along the road; an illustration of the potential gatehouses is provided as Figure 1.

This Policy provides a framework for safeguarding the well-being of AAP employees, contractors, and the environment. By outlining clear guidelines for security, private access control, traffic management, and emergency response, we can minimize the likelihood of accidents, injuries, and fatalities. Additionally, such a policy ensures compliance with regulatory standards and industry best practices, fostering a culture of safety and accountability within the AAP and the region as a whole. This Policy applies to all employees, contractors, permit holders, and approved vehicles utilizing the controlled access road within the ROW authorization and permitted area.

2. ROLES & RESPONSIBILITIES

A. Management

- Management is responsible for establishing and enforcing safety procedures, providing necessary resources for road maintenance and safety equipment, and ensuring compliance with this policy by all employees, contractors, and users.
- The AAP Program Manager shall be responsible for the implementation of this Policy and shall provide regular reports of road traffic and any known incidents of unauthorized access on the road to the Subsistence Advisory Committee.
- The AAP Program Manager, or his/her designee, shall develop the appropriate road user training and shall provide appropriate means of delivering this training.
- Training records of authorized users shall be kept by the AAP Program Manager. The AAP Program Manager, or his/her designee, shall also keep appropriate records of road users and traffic.
- As requested by the Subsistence Advisory Committee, the AAP Program Manager shall provide updates to the SAC on any security incidents.

B. Employees, Authorized Users and Contractors

- All employees, authorized users and contractors are responsible for adhering to the safety guidelines outlined in this Policy, reporting any hazards or incidents immediately, and participating in any and all safety training programs as required.
- All employees, contractors, or other road users are responsible for following applicable road use stipulations, scheduling requirements, and communication

procedures while using the road.

- All users of the AAP road shall receive training on proper road operations, communications, and responses to environmental and wildlife incidents.

C. Security Personnel

- All road users and security personnel are responsible for monitoring access points, enforcing traffic rules, reporting unauthorized/unsafe activities, and assisting in emergency situations.

3. PROCEDURE

Security and road access shall follow the procedures outlined in this section. All road users shall be provided authorization for road use prior to their entering the roadway; single-lane traffic needs to be coordinated.

All access will be controlled by the security gates on the east and west ends of the road. Monitoring and reporting of all traffic, including any attempted non-authorized users, will be the requirement of all users. Transportation for local community benefit will be allowed as an authorized user with permitted authorization.

4. GENERAL ROAD USE & AGENCY OR EMERGENCY ACCESS

A. Use of the road would be by authorization only, by drivers who have received road-specific training and who are equipped with 2-way very-high-frequency radios. Entry into the roadway for travel must be coordinated and approved prior travel.

B. Almost all use would be by those with commercial drivers' licenses. Exceptions would be agency access or during emergencies.

C. Agency access is likely to include those that need access for permit-compliance inspections related to the road and mines, land management, land use planning, scientific research, and, if necessary, firefighting. Alaska State Troopers on official business likely would be authorized. Community emergency medical personnel would be included for emergency response and medical evacuation. Transport of the general public, either by commercial vehicle or public transit, would not be included in the authorization.

D. Owners of the land crossed by the road may require additional authorization. For example, if another mine were proposed outside the District, access may be allowed, but authorization would have to be negotiated and permitted. Landowners issuing such authorization would do so in consultation with AIDEA and its road operator, and all drivers would be required to follow AIDEA road safety and operations requirements.

5. COMMERCIAL USE

A. All drivers of commercial vehicles/trucks on the AAP road must be authorized through a permit process to drive the road and have a valid commercial driver's license issued by the State of Alaska.

B. A permitting system will allow traffic to and from the District and will allow delivery of goods and fuel, by commercial carrier only, to communities/landowners near the road.

C. AIDEA's road operator would have authority to allow drivers access under specific contractual agreements and in accordance with applicable land owner requirements and/or ROW permits.

D. Commercial vehicles delivering goods or fuel for communities would be subject to insurance requirements. The cost to drive the road for commercial deliveries has not been determined at this time and may be waived for community benefits.

6. INCIDENT REPORTING

A. All accidents, near misses, injuries, or property damage occurring on the AAP road must be reported to management immediately.

B. All incidences of non-compliance or unauthorized access and road use must be reported to management immediately.

C. An investigation will be conducted for every reported incident to determine the root cause and implement corrective actions or policy changes as needed.

7. COMPLIANCE AND ENFORCEMENT

A. Non-compliance with this Policy may result in disciplinary action, including suspension of access privileges.

B. Regular audits and inspection will be conducted to ensure compliance with this Policy, safety regulations, and safety standards.

C. Landowner agreements and ROW authorizations may require additional compliance and reporting requirements.

8. REVIEW & REVISON

A. This Policy will be reviewed periodically to ensure its effectiveness and relevance. The Policy will be reviewed immediately if multiple incidents occur within a short period of time.

B. Any necessary revisions will be made in consultation with relevant stakeholders and communicated to all employees and contractors

9. DEPARTURE FROM POLICY/PROCEDURE

This Policy was written to ensure adequate controlled access along the AAP road and to ensure the safety of road users and the integrity of the region, its wildlife, and environment. Failure to follow this Policy could result in injury or death to personnel and/animals. Departure from this Policy will be limited to the maximum extent practicable. Deviations from this procedure shall only be approved by the AAP Program Manager. The only instance in which deviations may be made without prior approval by the AAP Program Manager are medical or environmental emergencies. Details about the incident and deviation must be documented and provided to the Program Manager immediately following the conclusion of the emergency situation.

10. KEY DOCUMENTS, TOOLS, & REFERENCES

Resolution 2024-01, Road Operations: Fish, Wildlife, and Security Management Plan

Figure 1. Illustration of Potential Gatehouses: The following depicts a potential gatehouse (illustration purposes only).

Ambler Access Project

Spills Report Card

Revision History		
Date	**Description**	**Notes**
2/9/24	Initial Draft	Developed by AIDEA

Spills Report Card

Ambler Access Project

Maintenance and Monitoring Report

Revision History		
Date	**Description**	**Notes**
2/9/24	Initial Draft	Developed by AIDEA

Maintenance and Monitoring Report

1. PURPOSE AND SCOPE

2. PROCEDURE

3. KEY RESPONSIBILITIES

4. DEPARTURE FROM PROCEDURE

5. GENERAL REQUIREMENTS

6. KEY DOCUMENTS, TOOLS, & REFERENCES