

**Commercial Big Game Guide permit for**

**Alaska Peak Air Adventures**

**ENVIRONMENTAL ASSESSMENT**

**SPECIAL RECREATION PERMIT (SRP)**

For  
Jeff Burwell  
Alaska Peak Air Adventures  
3836 E. Country Field Cir.  
Wasilla, Alaska 99654

FF096025

DOI-BLM-AK-F020-2013-0011-EA

**Located in:**

Eastern Interior Field Office  
Fortymile Management Area

**Prepared by:**

U. S. Department of the Interior  
Bureau of Land Management  
Eastern Interior Field Office  
1150 University Ave.  
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## I. Purpose and Need for the Proposed Action

### BLM Purpose and Need

The purpose for action is to determine whether or not to issue a Special Recreation Permit (SRP) for commercial big game hunting activities on BLM-managed lands in the Fortymile subunit (Figure 1). The need for action is established under the authority of Section 302 of the Federal Land Policy and Management Act (FLPMA) of 1976 and the regulations found in 43 CFR 2930. The FLPMA directs the BLM to regulate the use, occupancy and development of public lands. The directives of the regulations found in 43 CFR 2930 are to determine when a permit is required to use public lands for recreational purposes and to establish procedures for the orderly and timely processing of permit applications.

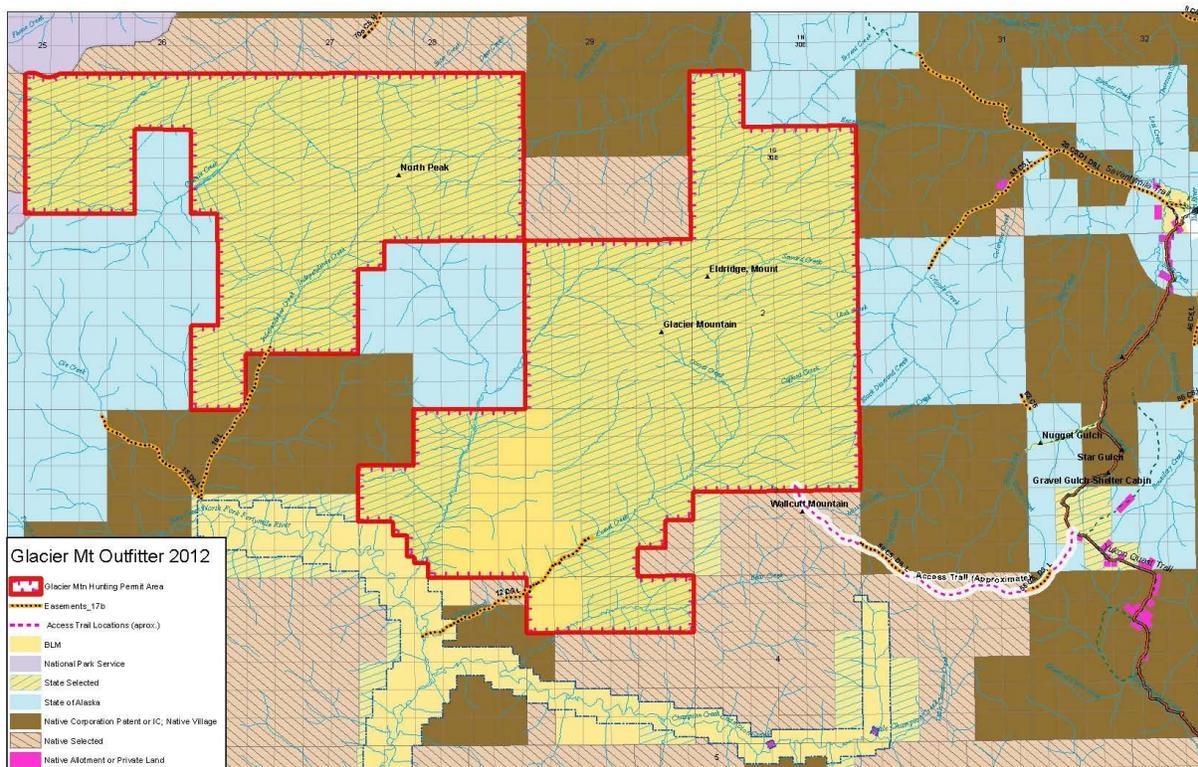


Figure 1. Glacier Mountain proposed guide area.

### Applicant's Purpose and Need

Mr. Jeff Burwell with Alaska Peak Air Adventures has applied for a SRP for the purpose of providing guided fall hunting trips for sheep, caribou and grizzly bear hunts for up to six (6) clients this season in the Glacier Mountain area. Mr. Burwell needs to obtain a SRP in order to conduct his commercial guiding activities. Guided hunting trips and supporting activities are scheduled to be conducted between early August and late October.

## BLM Decision to be made

The BLM will decide whether or not to issue a 2930 SRP for the applicant's commercial big game hunting operation. If a SRP is issued, the BLM will determine the terms, conditions and stipulations prior to issuance.

## **II. Potential Issues**

Internal Scoping: Several potential impacts were raised, but about half were dismissed as they were addressed by revising the proposed action. These include number of sheep hunters requested, introduction of invasive, nonnative species and hazmat. The impacts of the proposed action on subsistence and recreation are carried forward and addressed in this EA.

External Scoping: A 30 day public scoping period was announced specifically in Tok and Eagle, Alaska. 17 comments were received from 13 different persons. Potential concerns or issues received are listed and referenced in order of greatest to least commented on:

1. Should guiding be allowed in this area?
2. Will user conflict occur due to the nature and small size of the area?
3. Will there be a loss of the unique hunting qualities of the area?
4. Will the proposed action allow for a sustainable sheep harvest in this area?
5. Will guiding activities impact non-guided users and could it be delayed?
6. Will increased non-resident sheep hunting impact resident use?
7. What aircraft use will be allowed and what impact will it have?
8. Will horse use increase the spread of invasive plants?
9. Are there issues with the applicant?
10. Will guiding use impact subsistence harvesting use in the area?

## **III. Location, Land Status and Conformance with Land Use Plans**

Location: The proposed action will take place in all or portions of Townships 1S 25E, 1S 26E, 1S 27E, 1S 28E, 1S 30E, 2S 27E, 2S 29E, 2S 30E, 3S 28E, 3S 29E, 3S 30E, and 4S 29E Fairbanks Meridian. See attached map (Figure 1).

Land Status: The majority of the proposed acreage is selected by the State of Alaska. No selected Native corporation lands are included in the proposed action. See attached Master Title Plat's (MTP's) (Figure 2).

Conformance with Land Use Plans: Even though it is not specifically provided for, the proposed action is in conformance with the Fortymile Management Framework Plan (September 1980, because it is clearly consistent with the goal of the plan which is stated in the *Summary of Land Use Decisions and Management Direction*: "This Plan has been written with the goal of providing the most appropriate

management for each area and situation, in accordance with the principals of multiple use”. Issuance of special recreation permits is clearly consistent with the principals of multiple uses.

#### **IV. Proposed Action and Alternatives**

##### Proposed Action Alternative:

The proposal by Alaska Peak Air Adventures (APAA) is to run a limited number of guided hunting expeditions in the Glacier Mountain and Mount Eldridge area. They will offer trips that will include hunting sheep, caribou, and grizzly bears on BLM-managed lands. They will use horses and aircraft to conduct the hunts. Access to the hunt area will be overland via the “Mini-cup”/Wallcut Mountain Trail, west off of American Summit.

APAA plans to take up to a total of six (6) hunters annually on BLM-managed lands in the proposed area with no more than a total of two of the hunters hunting sheep. The operating season will run from August through October. Clients will be under their care and supervision for the entire duration of the hunt. Provisions will be provided for 10 day trips per group.

While operating on BLM managed lands, APAA will incorporate “Leave No Trace” and “Pack it in – Pack it out” ethics. They will be using short-term, primitive, small spike camps. The camps will not be permanent or long-term in nature. Fuel will not be stored in containers larger than 5 gallon gas cans at any time. Human waste will be handled using “cat holes” located a minimum of 200 feet from the nearest water sources. No live standing timber will be cut and fresh water will be filtered from local streams. Pack trips will utilize no more than 10 animals per trip. Horses and mules will be tethered to live trees using the “highline” method and will be naturally grazing and eating certified “weed free” pellets or hay. All livestock will be restricted to a weed-free feed four days prior to trip departures. Aircraft could be utilized prior to August 5 and after September 20 for support and/or cleanup or grizzly bear hunts. APAA plans to offer adventures that are of the highest quality while considering safety and security of their clients as priority. The APAA will provide the BLM with a list of all personnel in the field along with a copy of any applicable licenses and proposed trip dates and any changes that may occur up to the time of the hunt.

##### The One Sheep Hunt Alternative:

The One Sheep Hunt Alternative is identical to the proposed action with the exception of only one of the six authorized hunters being able to pursue a sheep.

##### No Action Alternative:

The no action alternative would result in the applicant not being issued a permit to conduct guided hunting trips in the Fortymile Management area.

#### **V. Affected Environment**

The Glacier Mountain area is located along the far eastern boarder of Alaska roughly 15 miles southwest of Eagle, Alaska. The area is fairly high in elevation, mostly alpine or sub-alpine in nature. Access is

difficult based on lack of developed trails and distance from the nearest road. Use of the area is low and primary activities consist of trapping, dispersed recreation, and subsistence gathering. Wildlife in the area includes Dall sheep, caribou, and grizzly bears.

### Recreation

Recreation use in the proposed hunting area is considered very low. No known recreation use/user studies or surveys have been conducted of this area. No recreational sites or facilities have been developed and none are planned to be developed in this area at this time. Recreational access to this area is considered relatively difficult. The primary access to the area is through the American Summit/Wallcut Mountain Trail. This route is roughly 22 miles from the Taylor Highway to Glacier Peak. The entire route is on State or State selected lands and Corporation or Corporation selected lands with 17B easements existing on Corporation conveyed lands. The first five miles of the trail consist of a user created single or two track OHV or foot path and beyond that no evidence of a trail exists on the ground with dispersed ridgeline travel occurring. Other possible but not as viable access routes include the headwaters of Teddy's Fork and Mission Creek routes. Again, no defined trail is established on either of these two routes.

Known or assumed recreational use that occurs in this area includes: dispersed hiking, winter trapping in the lower drainages, and hunting. Hunting use in this area is primarily focused on Dall Sheep. Caribou can and are likely to be frequent in the area but hunting for them typically takes place closer to the road system. The State of Alaska Department of Fish and Game has designated this area as a Controlled Use Area, where no motorized use is allowed to occur during sheep season. Fish and Game records indicate that between zero and six sheep have been harvested annually in this area over the past decade. This likely represents the most substantial recreation use in the area.

The current Fortymile Management Framework Plan does not specifically mention any recreation management guidelines for the Glacier Peak area other than the standard custodial responsibilities. General recreation management direction for this area is to continue managing it for primitive dispersed use. Primitive dispersed use is defined to include smaller group sizes and a limited number of contacts with other groups in the area. The area lends itself well to this management strategy with unique high alpine hiking, viewing opportunities, and no developed recreation facilities. The Glacier Peak area lies outside of any proposed Special Recreation Management Areas (SRMA's) identified in the draft Eastern Interior Resource Management Plan.

### Subsistence

The proposed action would occur in the northern portion of Game Management Unit (Unit) 20E in the Glacier Mountain Controlled Use Area (CUA) and adjacent to the North Fork of the Fortymile Wild and Scenic River. Local rural residents that depend on Unit 20E for subsistence resources live primarily in the vicinity of Eagle, Eagle Village and along the Upper Yukon River and its tributaries. The area is also important to the rural community of Tok.

Rural residents of the Upper Tanana and Yukon areas rely on Chinook (King) salmon, caribou, moose, sheep, berries, other forest products and trapping to meet their subsistence needs (Caulfield 1979). Chum (dog) salmon are traditionally used for feeding dog teams. Chinook salmon stocks have sharply declined in the Yukon River drainage in the past 20 years and many families of the Upper Yukon River did not

harvest Chinook salmon in 2012. These residents are shifting to other resources to replace the once dependable Chinook salmon part of their diets (JTC 2013).

Additionally, barriers to harvest of terrestrial wildlife are increasing in northern Unit 20E as Alaska Native Claims Settlement Act selections are conveyed and become private land. Although access across these lands is maintained, hunting on corporation and village land is normally limited to stockholders and tribal members.

During February 2013 winter meetings of the Eastern Interior Regional Advisory Council (EIRAC) to the Federal Subsistence Board (Board), the EIRAC developed a proposal to the Board that would establish a subsistence hunting season and bag limit for sheep in Unit 20E and a second to establish a customary and traditional use determination for local rural residents for Unit 20E sheep. Support for the proposals includes the need to shift to other resources, including sheep, as the decline in Chinook salmon stocks limit fishing opportunity and success. In recent public comment meetings/ANILCA Section 810 hearings on the Eastern Interior Resource Management Plan, participants echoed that sheep are becoming more important to them as the Chinook salmon stocks continue to decline and are unavailable for harvest. Increase need for sheep was also stated by residents of the Eagle area because conveyances of corporation and village selections are restricting their use of important moose and caribou hunting areas.

Caulfield (1979) recorded traditional and contemporary use of sheep by residents of Eagle and Eagle Village in the Glacier Mountain area. Although hunter participation data are not currently available, 26% of all sheep reported for this area from 1996 – 2011 were taken by subsistence hunters from the Tok and the Eagle areas. Subsistence effort and harvest are expected to increase as supported by recent discussions and EIRAC actions.

Dall sheep populations in the vicinity of the proposed action include small, discrete groups separated by areas of unsuitable habitat. The populations persist at low numbers in the Glacier Mountain areas because sheep habitat here is of low-quality and low elevation that limits escape terrain. Physical barriers to movement constrain the discrete populations to these areas.

Dall sheep population surveys in the Glacier Mountain CUA have been conducted since 1981. Twelve surveys have been successfully completed during that time (1981-83, 1998-2005, and 2012). The average number of harvestable rams (full-curl or larger) for all survey years is 4.8 rams. Eight consecutive years of census data from 1998 - 2005 indicate a stable cohort of legal rams in the population and a mean of 5 full curl rams (range 2 – 7), which is consistent with the mean when pooling all years of census data.

Current regulations for hunting sheep in the Glacier Mountain area allow for one full-curl horn or larger ram and the season is August 10 through September 20. A bag limit of one full-curl or larger ram limits potential total harvest of rams in the population.

Glacier Mountain CUA is closed to the use of any motorized vehicle for hunting, including aircraft, from August 5 through September 20 (ADFG 2012). The most common form used by hunters for access to the CUA is walk-in. Access using horses and/or mules has occurred but is uncommon. When the CUA was created, access was walk-in only. The regulation was changed to include access using horses subsequently.

At the time of this analysis, data on hunting pressure and success rates are not available. Reported harvest since 1996 has ranged from 1 to 6 sheep, although in some years no harvest was reported. Reported harvest for Glacier Mountain in 2012 was 6 full-curl rams.

## **VI. Impacts: Direct, Indirect, Cumulative**

### Recreation (direct, indirect and cumulative impacts):

#### Proposed Action Alternative:

The applicant is proposing guide two separate sheep hunters on individual trips. Each trip will consist of 3-4 persons total and last for roughly one week in duration. Four additional clients would be authorized for bear or caribou hunts in the area but are unlikely to occur. The direct impact of this proposal is the addition of two groups in the area during the more heavily used sheep hunting season. The group size is within the average for an expected group size participating in a primitive dispersed use activity. The addition of the two groups would not change the primitive nature of the recreation experience or propose a challenge to the custodial recreation management of the area. Indirect and cumulative impacts are not anticipated due to the temporary and short term nature of the proposal. Future cumulative impacts could occur if other SRP's are requested for this area.

#### The One Sheep Hunt Alternative:

Same as the proposed action.

#### No Action Alternative:

Impacts from denying this action would include limiting commercial recreation opportunities in this area.

### Subsistence (direct, indirect and cumulative impacts):

#### Proposed Action Alternative:

Under the proposed action, the applicant could guide six hunters, two of which could be sheep hunters, into the Glacier Mountain area. This section analyzes the impacts on subsistence hunters from the proposed action based on two guided sheep hunters, the mean number of legal rams, guided hunter success rates, reaction of sheep to anthropogenic disturbance, and shifting dependence to sheep.

The proposed action is expected to have direct impacts on subsistence hunters by limiting the number of sheep available for subsistence use due to harvest and disturbance.

Data on guided and unguided sheep hunter success is not available at the time of this analysis, however anecdotal information supports that success rates for guided sheep hunters are generally very high. Estimated success rates of 95% are reported by registered sheep guides in Alaska (pers. comm. and websites). Therefore for the purpose of this analysis and based on self-evaluation by guides, it is assumed that each guided hunter would harvest a sheep. Based on the assumption, the two guided sheep hunters would harvest 41% of the average number of legal rams in this population. This level of harvest may

significantly restrict subsistence use. Depending on survival of rams in any given year, two sheep could be the harvestable surplus and would significantly restrict subsistence use of the area Dall sheep population.

Impacts on the availability of sheep to subsistence users could result from disturbance and the advantage of travel into the area with horses. Geist (1999) observed that wild sheep exposed to hunting where other disturbance events are rare “withdraw to localities distant from this kind of” disturbance by humans and that sheep maintain these long distances. Further, bands of Stone’s sheep rams subjected to hunting scattered widely in pairs or as singles in contrast to bands disturbed by nonhunting humans. In a study of potential impacts on Dall sheep in the White Mountains National Recreation Area from a proposed trail, Herriges (pers. comm. 2013) noted that Dall sheep maintained distances of 400 meters (.25 mile) or more from humans on foot. At the time of the study, this population of sheep was similar to the Glacier Mountain population in that it was largely isolated from other forms of disturbance. Disturbance by guided hunters could significantly impact availability of sheep to subsistence users. Lack of availability due to this change in distribution could be mitigated through delaying the start date for guided hunting in the area.

Prolonged higher hunting pressure on this population may alter availability of sheep. This indirect impact from the proposed action on movement of subsistence sheep is not expected to significantly restrict subsistence use. Additionally, since the bag limit restricts harvest to full-curl rams indirect impacts at the population level are not expected.

No past, present or reasonably foreseeable actions in the area, when considered with the proposed action, are expected to cumulatively impact subsistence use or the resource.

#### The One Sheep Hunt Alternative:

Direct impacts on subsistence from this alternative are reduced compared to those of the proposed action; 21% of the harvest, given an average number of 4.8 legal rams, would be harvested by a guided hunter. Within the range of legal rams detected in the 1998 – 2005 surveys, one ram would represent 50% of the harvestable population. Disturbance to the sheep will be reduced in this alternative but a delayed start would give subsistence hunters an opportunity to harvest sheep prior to the presence of a guided hunter. The One Sheep Hunt Alternative with a delayed start is expected to have no significant restriction on subsistence use or resources.

Indirect and cumulative impacts are expected to be the same as those for the Proposed Action Alternative.

#### *No Action Alternative:*

No direct, indirect, or cumulative impacts to subsistence use and resources will be impacted by the No Action Alternative.

## **Mitigating Measures**

The applicant will delay guiding for sheep in the area of the proposed action until August 20 to allow for priority opportunity for sheep to subsistence hunters. Impacts of the **Proposed Action Alternative** may significantly restrict subsistence with or without the delayed start.

A delayed start of August 20 would help mitigate the impact of The One Sheep Hunt Alternative by providing an opportunity for subsistence users to harvest sheep prior to initiation of the guided hunt.

### **Residual Impacts**

No residual impacts to subsistence use or resources are expected from the Proposed Action Alternative, Alternative 1 or the No Action Alternative.

## **VII. Consultation and Coordination:**

External Scoping: A 30 day public scoping period was announced specifically in Tok and Eagle, Alaska. 17 comments were received from 13 different persons. Potential concerns or issues received are listed and referenced in order of greatest to least commented on:

1. Should guiding be allowed in this area?  
The BLM's current land use plan for the area does not limit the number of guides allowed in this area. Setting a guide use allocation for this area is outside the scope of this EA and is not addressed any further.
2. Will user conflict occur due to the nature and small size of the area?  
User conflict is not expected to occur within the area and the area will continue to be managed for primitive dispersed use. Changes in the proposed action and Decision Record reflect that only one sheep hunt will be allowed in the CUA and no sheep hunting will begin before August 20<sup>th</sup>, ten days after the season opening. These changes should further mitigate user conflict in the area.
3. Will there be a loss of the unique hunting qualities of the area?  
The loss of unique hunting qualities is not expected to occur within the area and the area will continue to be managed for primitive dispersed use. Changes in the proposed action and Decision Record reflect that only one sheep hunt will be allowed in the CUA and no sheep hunting will begin before August 20<sup>th</sup>, ten days after the season opening. These changes should mitigate loss of the unique hunting qualities of the area.
4. Will the proposed action allow for a sustainable sheep harvest in this area?  
This issue is outside of the BLM's jurisdiction. Alaska Department of Fish and Game (ADF&G) manages wildlife and sets harvest limits. The BLM and the applicant met with Jeff Gross of ADF&G to discuss possible resolution of this issue.
5. Will guiding activities impact non-guided users and could it be delayed?  
Guided hunters will likely have very little impact on non-guided users in the area. The proposed 10 day delay start would further reduce any guided/non-guided conflict in the area.
6. Will increased non-resident sheep hunting impact resident use?  
This area is not specifically managed for State of Alaska residents. Non-resident sheep hunting is not anticipated to impact resident users and other than subsistence users no preferences exist.
7. What aircraft use will be allowed and what impact will it have?

Limitations on aircraft use within the CUA are the jurisdiction of the state. The applicant is required to comply with all applicable state laws. An ADF&G Trooper was involved in discussions for the permit and provided the applicant and agency with a letter covering what is allowed and not allowed within the CUA.

8. Will horse use increase the spread of invasive plants?

There is a potential for the spread of invasive plants. The applicant has proposed to carry forward all preventative actions to limit the spread of invasive plants required in his permit last year.

9. Are there issues with the applicant?

The State of Alaska is responsible for licensing guides and outfitters. The applicant is a licensed guide.

10. Will guiding use impact subsistence harvesting use in the area?

Subsistence resources could be impacted and are analyzed in the EA. The One Sheep Alternative was recommended.

Persons/Agencies Consulted

<b>Person</b>	<b>Title</b>	<b>Responsibility</b>	<b>Agency</b>
Jeff Burwell	Applicant		Applicant
Jeff Gross	Biologist	Wildlife management and harvest	ADF&G
Jonathan Priday	Ranger	Enforcement officer	BLM
Collin Cogley	Outdoor Recreation Planner/Preparer	ACEC's, Environmental Justice, Farm Lands, Recreation, Socioeconomics, Fire Management, and Access	BLM
Ruth Gronquist	Wildlife Biologist	Vegetation, Invasive, Nonnative Species, Threatened/Endangered Species, Subsistence, Wildlife/Terrestrial	BLM
Rebecca Hile	Physical Scientist	Wastes, Hazardous or Solid	BLM
Ben Kennedy	Hydrologist	Air Quality, Floodplains, Water Quality, Wetlands/Riparian, Soils	BLM
Holli McClain	Outdoor Recreation Planner	Visual Resources, Wilderness Characteristics	BLM
Robin Mills	Archeologist	Cultural Resources, Native American Religious Concerns	BLM

<b>Person</b>	<b>Title</b>	<b>Responsibility</b>	<b>Agency</b>
Jason Post	Fisheries Biologist	Essential Fish Habitat, Wildlife/Aquatic	BLM
Darrel VandeWeg	Geologist	Minerals	BLM
Kevan Cooper	Realty Specialist	Wild and Scenic Rivers	BLM

## VIII.

### List of Attachments

Attachment 1 - Assessment of Archeological, Historical, and Paleontological Resources

Attachment 2 - ANILCA Section 810 Evaluation and Findings

Attachment 3 – Essential Fish Habitat Clearance (EFH)

Attachment 4 – Invasive Plant Prevention Client Letter

Attachment 5 - Proposed Stipulations for Permit FF096025

#### *Citations:*

ADFG, Alaska Department of Fish and Game. 2012. 2012 – 2013 Alaska Hunting Regulations. Anchorage Printing. 128 pp.

Caulfield, R. 1979. Subsistence Use and around the Proposed Yukon-Charley National Rivers. Univeristy of Alaska. Occasional Paper No. 20.

DuBois, S. 2008. Dall Sheep management report of survey-inventory activities 1 July 2004 – 30 June 2007. P. Harper, editor. Alaska Department of Fish and Game. Juneau, Alaska.

Geist, V. 1999. Adaptive Strategies in American Mountain Sheep: Effects of Climate, Latitude and Altitude, Ice Age Evolution and Neonatal Security. In Mountain Sheep of North America. Eds R. Valdez and P. Krausman. University of Arizona Press.

JTC (Joint Technical Committee of the Yukon River US/Canada Panel). 2013. Yukon river salmon 2012 season summary and 2013 season outlook. Alaska Department of Fish and Game, Division of Commercial Fisheries, Regional Information Report No. 3A13-01, Anchorage.

/s/ Collin Cogley  
Collin Cogley,  
Outdoor Recreation Planner,  
Preparer

5/10/13  
Date