



**Bureau of Land Management**

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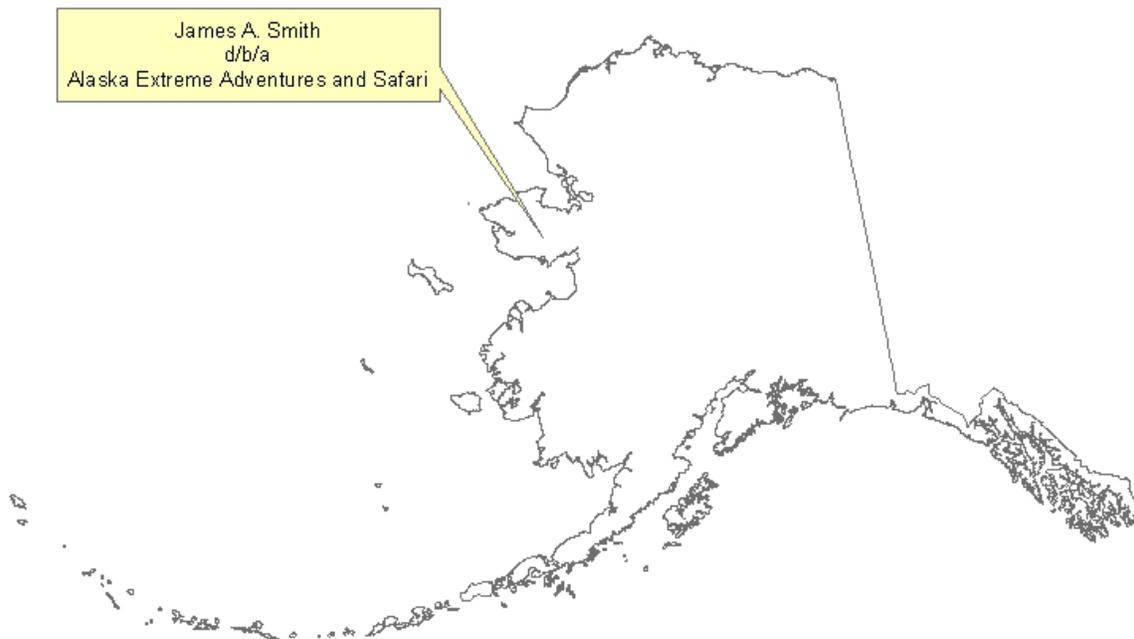
**Environmental Assessment (EA)**

Special Recreation Permit (43 CFR 2930)

James A. Smith, d/b/a Alaska Extreme Adventures & Safaris

AA-086400

AK-040-06-EA-033



**Location:**

Sec. 34, Township 3 South, Range 23 West, Kateel River Meridian and  
Sec. 20, Township 4 South, Range 24 West, Kateel River Meridian.  
State of Alaska, Department of Fish and Game, Guide Use Area 22-05

**Prepared By:**

Thomas Sparks  
Natural Resource Program Coordinator  
Nome Field Station  
May 1, 2006

I. INTRODUCTION

The applicant, James A Smith, d/b/a Alaska Extreme Adventures & Safaris, has applied for a Special Recreation Permit (SRP) to conduct four guided bear hunting trips out of two camps in the south central region of the Seward Peninsula.

A. Purpose and Need for the Proposed Action:

State law requires non-residents to hire a registered guide to hunt grizzly bear.<sup>1</sup> Additionally, guiding services offer the public increased safety while in remote or relatively inaccessible locations on the Seward Peninsula, Alaska.

B. Conformance with the Land Use Plan:

The Proposed Action is in conformance with the Northwest Management Framework Plan (MFP) dated October 5, 1982, activity objective Recreation (R-1). This objective states that BLM will provide recreational opportunities appropriate to the needs of visitors.

C. Relationship to Statutes, Regulations, Policies, Plans or Other Environmental Analyses:

An SRP is required for commercial recreational use of public lands or water. The permit regulations are contained in 43 CFR 2930, which implements Section 3 of the Land and Water Conservation Fund Act, as amended<sup>2</sup> and Sections 302(b) and 303 of the Federal Land Policy and Management Act.<sup>3</sup> The Authorized Officer may grant up to a 10-year permit, subject to annual authorization. The permittee must satisfactorily meet the requirements associated with the SRP and conform to all applicable federal, state, and local laws and regulations.

Wildlife population numbers and commercial, sport and State-defined subsistence harvests are managed by the State of Alaska<sup>4</sup>. Guided and unguided sport hunting is also managed by the State. The State has licensed two guides in Guide Use Area 22-05: Tom Gray and the applicant.<sup>5</sup> Although allegations have been made that the applicant conducted guiding services in violation of State gaming laws; the applicant remains in good standing and is currently registered and licensed by the State in Guide Use Areas 6-06 and 22-05.

The Federal Subsistence Board manages federally qualified subsistence harvests on Federal “public land.”<sup>6</sup>

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<sup>1</sup> AS 16.05.407

<sup>2</sup> 16 U.S.C. 460l-6a.

<sup>3</sup> 43 U.S.C. 1701, *et. seq.*

<sup>4</sup> AS 16.05.255, 50, CFR §100.14(a).

<sup>5</sup> AS §§ 08.54.750 and 08.54.600

<sup>6</sup> 16 U.S.C. §3120, 50 CFR Part 100.

## II. PROPOSED ACTION AND ALTERNATIVE

### A. Proposed Action:

The applicant, James A. Smith, d/b/a Alaska Extreme Adventures & Safaris, is seeking a five-year SRP under which he proposes to use Federal public lands and related waters to conduct big game guided hunting operations. He proposes to establish a base camp in Section 34 of Township 3 South, Range 23 West, Kateel River Meridian, near Boston Creek on the Seward Peninsula. The base camp will consist of a weather port tent, a cook tent and pit privy. A spike camp will be located in Section 20 of Township 4 South, Range 24 West, Kateel River Meridian, near the Pargon River. The spike camp will consist of a 10' x 12' wall tent and a pit privy. All camping equipment will be removed from the field after the hunting season with the exception of the weather port tent, which the applicant intends to dismantle but would like to leave in the field for the next season. Access to the camps will be by "foot, boat, snow mobile & 4 wheeler" from Council, Alaska. The "4 wheeler"(s) are personal all terrain vehicles of less than 1,000 pounds gross/dry weight.

The applicant is proposing two eight-day spring hunts (April 10 through May 10) and two eight-day fall hunts (August 15 through October 1). The applicant anticipates six to eight clients per year. The hunting parties would be hunting grizzly bear, wolves and wolverine. The applicant is proposing to conduct the hunting trips within the State of Alaska's Department of Fish and Game, Guide Use Area 22-05 particularly in the Fish River Drainage and McCarthy's Marsh.

Guide Use Area 22-05 encompasses approximately 1,736,689 acres of land east of Nome on the south central portion of the Seward Peninsula between Solomon and Elim, Alaska, *see* Figure 1, below. Guide Use Area 22-05 is wholly within the State of Alaska's Game Management Unit 22 and Subunit 22B, *see* Figure 2, below. Guide use area 22-05 is comprised of further divisions of Subunit 22B: 401, 402 and 403, *see* Figure 3, below.

### B. No Action Alternative:

The No Action Alternative would be to continue present public land management practices in the area. Existing permitted commercial outfitting and guiding for big game hunting on public lands would continue at current levels. The applicant would be required to seek other areas to conduct his operations.

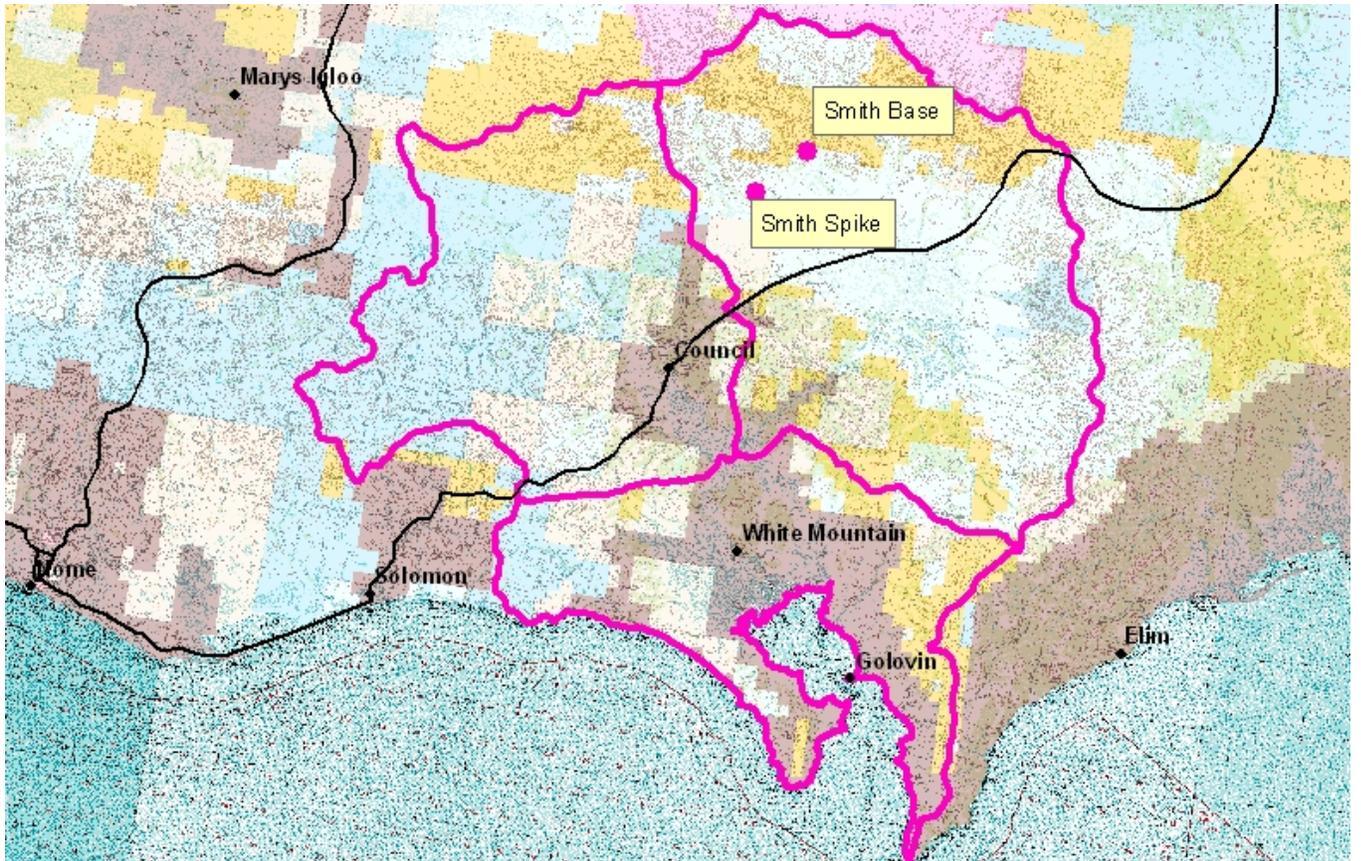


Figure 1.

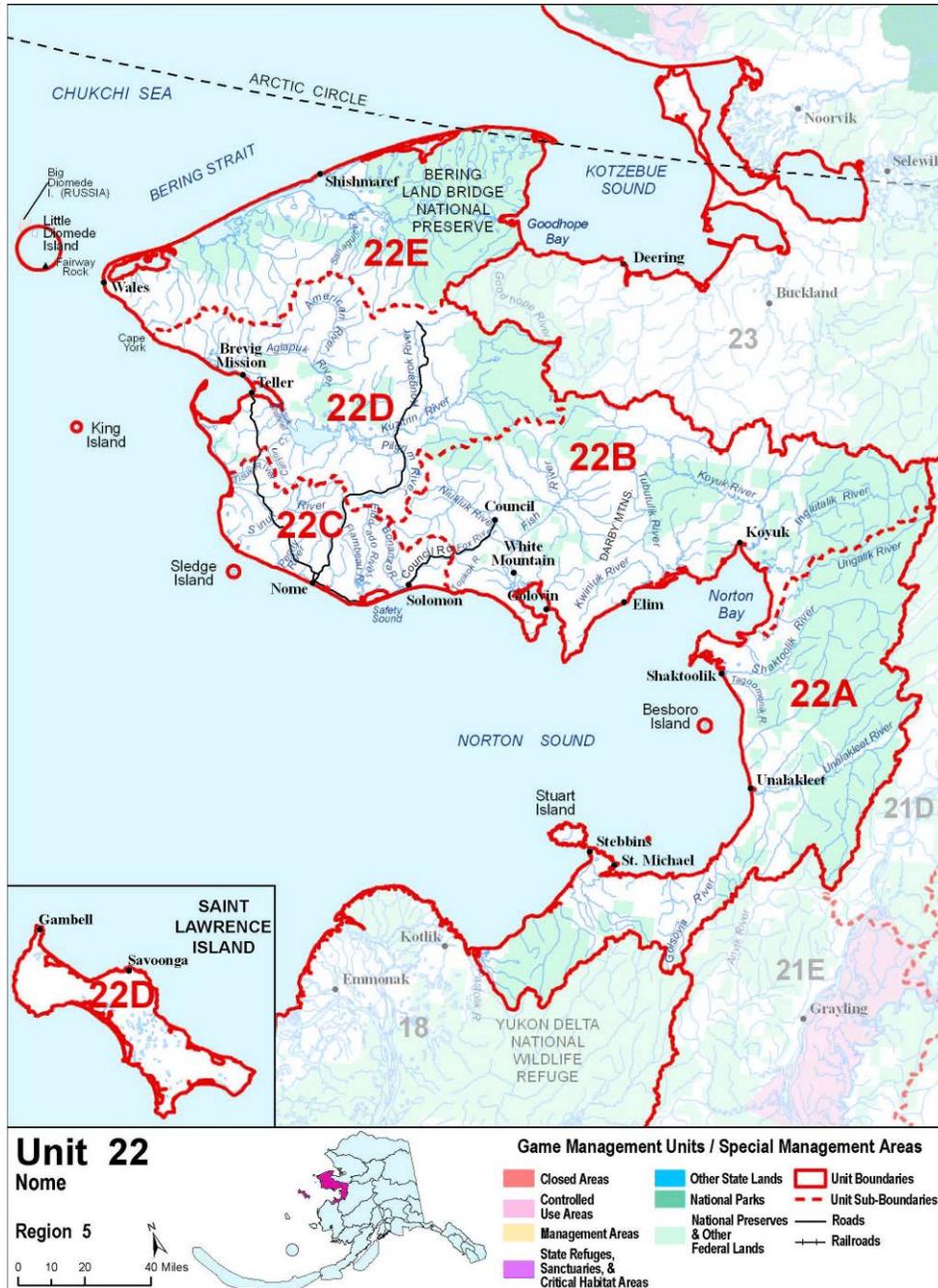


Figure 2.



Figure 3

### III. AFFECTED ENVIRONMENT

#### A. Critical Elements:

It has been determined that the following Critical Elements of the human environment are either not present or would not be affected by the Proposed Action or the No Action Alternative:

- Air Quality
- Areas of Critical Environmental Concern
- Environmental Justice
- Farm Lands (prime or unique)
- Floodplains
- Invasive, Non Native Species
- Native American Religious Concerns
- Wetlands/Riparian Zones
- Wild and Scenic Rivers
- Wilderness

1. Cultural Resources:

Several cultural features and resources exist in the Bendeleben Mountains, on the northern boundary of Guide Use Area 22-05. A cultural resource inventory of the area was conducted by BLM in 1991 (BLM- Alaska Open File Report 57, July 1995). The inventory noted several tent rings, caches, wind breaks and hunting blinds within the Boston Creek drainage near the proposed base camp. Clusters of sites were found at Boston Creek, the tributaries of the Fish River, and on the southern slopes of the Bendeleben Mountains. The sites ranged in age from the prehistoric to the historic.

2. Subsistence:

Residents of White Mountain, Golovin, and Nome use the Fish River/McCarthy's Marsh area for subsistence purposes. The Fish River drainage and McCarthy's Marsh are within the area the applicant proposes to hunt. Area residents use the area to hunt grizzly bear, caribou, and moose, to trap and hunt furbearing animals (primarily wolf and wolverine), and to fish for salmon (all Pacific species except for Sockeye), arctic char, grayling and white fish.

State regulations allow an individual, resident or non-resident, to take one brown/grizzly bear per regulatory year in the area in which the applicant proposes to provide guided hunts. This quota compares to one bear every four years in heavily regulated areas and two bears per year in lesser-regulated areas. The State also allows for the taking of five wolves and one wolverine per hunter in the area. There is no distinction between resident and non-resident hunters with regard to wolves and wolverines.

The Federal Subsistence Board manages federally qualified subsistence harvests on Federal "public land", 16 U.S.C. §3120, 50 CFR Part 100. Federal "public lands" are defined in the Alaska National Interest Lands Conservation Act Section at 102(3) as:

The term "public lands" means land situated in Alaska which, after the date of enactment of this Act, are Federal lands except--

(A) land selections of the State of Alaska which have been tentatively approved or validly selected under the Alaska Statehood Act and lands which have been confirmed to validly selected by, or granted to the Territory of Alaska or the State under any other provision of Federal law;

(B) land selections of a Native Corporation made under the Alaska Native Claims Settlement Act which have not been conveyed to a Native Corporation, unless any such selection is determined to be invalid or is relinquished; and

(C) lands referred to in §19(b) of the Alaska Native Claims Settlement Act.

[PL 96-487 (94 Stat. 2371) December 2, 1980]

The proposed spike and base camps will be located on lands selected by the State of Alaska under application numbers F-88785 and F-88784 respectively. As such, neither camp will be located on lands subject to federal subsistence management. There are lands within Guide Use Area 22-05 however, that are subject to such management.

The Federal Subsistence Board has determined that black bear, brown bear, caribou, moose, wolf are wildlife populations that have been customarily and traditionally used for subsistence by Alaska residents of a rural area or rural community within the State's Game Management Unit 22.<sup>7</sup> Wolverines do not have that distinction.

3. Threatened & Endangered Species:  
There are no known T&E animal species endemic to the south central region of the Seward Peninsula nor is there designated critical habitat for T&E animal species in the region.
4. Wastes, Hazardous/Solid:  
There are no known, hazardous wastes on BLM managed lands in Guide Use Area 22-05. A dilapidated cabin exists on the Pargon River. There are solid wastes on abandon and void federal mining claims at Omilak, on the east side of McCarthy's Marsh and a cabin at Wagon Wheel Creek. Other structures in the area are located on owned or applied for Native Allotments. There is a potential for trash and petroleum product spills from past guiding operations, local recreational use or subsistence hunting.
5. Water Quality, Surface/Ground  
Water quality data is lacking throughout much of Alaska. The water quality of Pargon River and Boston Creek is presumed to meet State and federal water quality standards

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<sup>7</sup> 50 CFR §100.24

B. Land Status:

The proposed base camp is located on lands selected by the State of Alaska under application number F-88784. The proposed spike camp is also located on lands selected by the State of Alaska, application number F-88785. There is an ANCSA 14(h) (8) selection at Lava Creek. The remaining lands within Guide Outfitter Area 22-05 are a mix of state owned/selected or Native Owned (Council, Golovin and White Mountain Native Corporations)/selected or federally owned lands, *see* Figure 1, above.

C. Recreation:

The State of Alaska has authorized two guides for Guide Use Area 22-05: Tom Gray and the applicant.

Recreational boating and rafting occurs on the Fish River and its major tributaries. Hiking, camping, fishing, hunting, wildlife viewing and other outdoor activities occur within Guide Use Area 22-05. A hot spring located at Lava Creek is frequented by local residents primarily during the winter and spring. Several remote unimproved gravel air strips are in McCarthy's Marsh, one at upper Boston Creek, one at Wagon Wheel Creek, and two at Omilak. These provide access for fixed wing aircraft to areas difficult to reach by boat, snow machine or ATV. The Nome Council Highway provides access to Council through Solomon.

D. Vegetation:

The riparian corridors of the Fish River drainages and its tributaries are characterized by willow, birch and alder, plus some white and black spruce trees. Habitat outside the riparian area is primarily a mix of wet and dry tundra (dwarf shrub, herbaceous perennials, grasses and sedges, lichen, moss, and sparse black spruce), with scattered stands of white and black spruce. The area is bounded on the east by the Darby Mountains, to the north by the Bendeleben Mountains and to the west by Casadepaga River. The rocky peaks of the Darby and Bendeleben Mountains are sparsely vegetated.

E. Visual Resources:

The visual resources in the area of the proposed action are pristine and natural. The area is above the northern limit for tree growths and offers broad views across rolling open tundra and treeless mountain slopes and ridgelines. Views from riparian areas are generally limited to the immediate area due to shrubby tree species and thicker vegetation.

Expansive and scenic views of the Fish River and its tributaries are available from high vantage points in the vicinity of the spike and base camps. No roads exist in the area and travel is confined to snowmachine and ATV equipment, as well as air travel by mostly light aircraft. There are a few established camps in the area

mostly on Native Allotments/Native Corporation owned lands along the lower Fish River.

The area of the proposed action is currently designated as VRM Inventory Class IV in the Kobuk-Seward Peninsula Draft Resource Management Plan and Environmental Impact Statement, April, 2006. The preferred alternative for the area of the spike and base camps in the same draft plan is designated VRM Management Class III with a small portion of potential VRM Class IV. The objective of a VRM Class III is to partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate. Management activities may attract attention but should not dominate the view of the casual observer. The objective of a VRM Class IV is to provide for management activities which require major modification of the existing character of the landscape. The level of change to the characteristic landscape can be high and these management activities may dominate the view and be the major focus of viewer attention.

F. Wildlife:

The land covered by the permit application is located within the Alaska Department of Fish and Game (ADF&G) Game Management Subunit 22B, *see* Figure 2, above, and is inhabited by many wildlife species including, but not limited to moose, grizzly bear, caribou, wolf and wolverine.

The Alaska Department of Fish and Game has no population estimates on bear numbers in Unit 22B but believe that brown and grizzly bear densities are higher in eastern Unit 22 compared to the western portion. Caribou numbers have risen substantially in Unit 22. The Western Arctic Caribou Herd is now the largest in Alaska, estimated at 490,000 in 2003 (Pers. Comm. Jim Dau, ADF&G). According to Persons (Persons, K. and P. Bente, 2000) the size of the Unit 22 wolf population is unknown but wolf densities are highest in Unit 22A and eastern 22B. Since the 1980s, there has been a gradual increase in wolves associated with wintering caribou. In 1998-1999, Unit 22 participated for the first time in the statewide trapper survey program. To better assess harvest and abundance of wolves and other furbearers, questionnaires were sent to hunter/trappers who harvested furbearers in the unit. Respondents from Units 22A and 22B reported that wolves were common and numbers seem to be increasing.

Moose density estimates for Unit 22B west of the Darby Mountains (22B West), indicate that moose populations have declined. A survey of 22B West in March 2004 resulted in a population estimate of 586 moose, indicating a decline of 64% since 1987 and 27% since 1999 (Persons 2004). The recruitment rate for 22B West was 9%.

Resident and migrant land birds nest and feed in shrub (alder and willow) and forest habitats. Cliffs and bluffs in the region may provide nesting habitat for raptors including rough-legged hawk, bald eagle, golden eagle, and peregrine falcon and gyrfalcon.

#### IV. ENVIRONMENTAL CONSEQUENCES

##### A. Impacts of the Proposed Action:

##### 1. Critical Elements:

##### a. Cultural Resources:

The proposed base camp and spike camp are unlikely to involve sufficient surface disturbance as to constitute a serious threat to any cultural remains that may be located in the area.

##### b. Subsistence:

Subsistence users in the area will witness additional pressure on limited game resources. Guiding operations will increase human intrusion into the area and increased snowmobile and off highway vehicle traffic may drive subsistence resources away from areas customarily used by residents of the area. A temporary base camp may dislocate some species from the area (primarily ungulates) and may attract scavengers (i.e. bear, fox, and wolverine). Temporary camps and hunting activity may displace animals in the immediate vicinity. Direct impacts however, would occur only during the short time that camps are in use.

There is no reason to believe that the applicant's activities in Guide Use Area 22-05 will jeopardize the caribou or moose populations; or that the applicant's activities will jeopardize rural Alaskans' subsistence priority as it pertains to bear, caribou, moose, wolf or wolverine. Moreover, the applicant intends to take two caribou and moose predator species: bears and wolves.

##### c. T&E Species:

The impact of the Proposed Action on T&E plants and animals and their habitats has been evaluated in accordance with the Endangered Species Act of 1973, as amended. Based upon current information available, the proposed action would not affect any T&E species or their habitats. Therefore, no consultation with the U.S. Fish and Wildlife Service is necessary pursuant to section 7 of the Act.

d. Wastes, Hazardous/Solid:

Base camps and spike camps will utilize fuel and other materials which contain oil and/or hazardous substances, such as batteries, oil/grease and pesticides (insect repellent). Human waste and wastewater will be generated on a daily basis as well as non hazardous waste material (trash). Potential for harm to the environment is presented by risks associated with spills of oil and/or hazardous substances, and improper management of wastewater and trash generated by human activity at camp sites.

e. Water Quality, Surface/Ground:

Use of a pit privy in violation of Alaska Department of Environmental Conservation regulations may contaminate ground, surface, and drinking water resources. Possible contamination may include increased fecal coliform bacteria that may result in sickness to humans. Increased nitrogen constituents may indirectly reduce dissolved oxygen supplies resulting in reduced habitat quality for fisheries.

2. Recreation

The Proposed Action would increase the number of temporary base camps in Guide Use Area 22-05. The Proposed Action would increase the number of recreational users in the area due to the increased level of commercial services available. There will be conflicts between user groups due to the increased level of commercial guiding. Due to the relatively limited number of trophy grizzly bear, there will be increased competition between guides working in the area and their clients. This competition may result in loss of trophy harvest opportunity for clients, animosity between guides and their assistants and lower the quality of a remote hunting experience.

3. Vegetation:

Some impacts to vegetation at the base and spike camps are expected. Degradation to flora may result from reduced sun light, trampling, and cutting in the immediate area of the temporary camps. However, these impacts are short term, as re-growth will occur once the camp is removed from the public lands. A more long term impact to vegetation may result from the use of fire pits. Intense heat may result in the complete mortality of vegetation and sterilization of the soil causing resistance for re-growth with within close proximity of the fire pits. This impact may persist for several months after burning ceases.

4. Visual Resources:

The temporary camps established in support of the proposed action would slightly affect the visual resources. During seasonal use periods, the camp sites and associated facilities may be minimally visible from adjacent ground locations, and would be most visible to observers in aircraft flying directly overhead or on surrounding mountain ridges. Stored materials will be obscured by a cover of snow over half the year and will not impact visual resources at this time. These materials may be marginally visible during non-snow periods, but will not stand out if organized and condensed under protective cover.

The proposed action will result in minimal impacts on visual resources and is fully consistent with the management objectives of both VRM Class III and VRM Class IV.

5. Wildlife:

Assuming no new regulatory restrictions by either the Alaska State Board of Game or a closure by the Federal Subsistence Board, the proposed action would directly affect the grizzly bear populations in Guide Use Area 22-05 by increasing the opportunity for harvest by guided non-residents hunters under State regulations. Moose may also be disturbed during their calving and breeding seasons by the increased activity, which may influence the decline in the moose population.

Increased snow mobile and ATV traffic may affect game movement, migratory patterns, and stress ungulate populations depending on the amount of use that occurs. Impacts to other wildlife populations will be minor or immeasurable.

At the spike and base campsite, a very small amount of wildlife habitat would be impacted by being trampled or cut to make space for tents or by other camping activities. Impacts to habitat would be slight in relation to the overall habitat in the area. Camping and the presence of food or harvested game animals at the campsites could attract bears and other scavengers if not properly secured. If such encounters occur, they may result in unplanned harvesting of bears.

B. Impacts of the No Action Alternative:

1. Critical Elements:

a. Cultural Resources:

Limited impacts to cultural resources occurring under current management would remain the same. Present users of BLM managed lands may impact cultural resources from illegal removal,

alteration of sites through camping and other uses of the lands.

b. Subsistence:

Conflicts between sport and subsistence hunters would remain under the no action alternative but would not be as acute. Such conflicts include hunting competition, competition for camping areas, competition for game resources and potential changes in game movement patterns. Under the No Action Alternative the number of commercial guides working in the area would stay at the current use level. The number of non resident hunters in the area may decrease due to the number of licensed guides working the area.

c. T&E Species:

Impacts to T&E species occurring under current management would remain the same. There is a possibility that current human use of the lands (camping, hunting, hiking, OHV use, aircraft landings, etc.) may be impacting *Douglasia beringensis* by killing or damaging individual plants. There are no T&E species within the area.

d. Wastes, Hazardous/Solid:

Limited impacts to BLM managed lands from waste would continue at present levels. Present users of BLM managed lands leave trash and other debris behind from their use of lands from camping, hunting, hiking, and OHV use (among other uses).

2. Recreation:

It is anticipated that current recreational use would remain about the same. There would still be some conflict between guides working on BLM managed lands or their clients in terms of camping areas or competition for harvesting trophy grizzly bear with resident sport and subsistence hunters.

3. Vegetation:

Impacts to vegetation currently occurring from public use would remain the same.

4. Visual Resources:

Visual resources would continue to be impacted under current BLM management from the establishment of temporary camps, air traffic, and other uses of lands managed by BLM which may impact visual resources.

6. Wildlife:

Wildlife would continue to be impacted by current BLM management and other activities. Population levels of bear, wolf and wolverine would likely remain at current levels for the foreseeable future depending on State regulatory actions. Subsistence and sport/recreation hunting, fishing and trapping would continue on BLM managed lands unless closed by regulatory action.

At campsites used by recreationists and hunters a very small amount of wildlife habitat would be impacted by being trampled or cut to make space for tents or by other camping activities. Impacts to habitat would be slight in relation to the overall habitat in the area. Camping and the presence of food or harvested game animals at the campsites could attract bears if not properly secured. If such encounters occur, they may result in unplanned harvesting of bears.

C. Cumulative Impacts:

The base and spike camp and related structures to assist in the applicant's outfitting and guiding operation will increase the recreation and sport hunting use (user days) in the Fish River drainages area by non residents. This increased use would be apparent to a few residents. Competition between hunters, commercial guides and their assistants working in the area would increase for the area. Subsistence resources may be impacted by altering migratory patterns of caribou and stressing moose populations that are limited in the area. Limited habitat loss would add to on going losses over the area but would be negligible. The indirect impact of this action would add cumulatively to the number of larger grizzly bear taken. This may indirectly skew the age/sex class of bears by taking larger boar bear from the population. These larger bear often kill young bears in an effort to "capture" breeding females. The result may be an increase in bear populations which may lead to a decrease in moose populations and increase human bear interactions such as bear feeding on subsistence caught salmon.

D. Mitigation Measures:

1. In order to protect *Douglasia beringensis*, from any adverse impact, any camps or landing strips should be moved if this species is found at the campsite or landing strip. Proper camp practices must be invoked to reduce the likelihood of unintended bear encounters. Use of a pit privy in compliance with ADEC regulations will prevent the contamination of ground, surface, and drinking water resources.
2. The applicant shall make every reasonable effort to avoid contact with and disturbance of caribou and/or moose.
3. All operational activities including setting up base and spike camps shall

occur after April 10 in the spring and before October 5 in the fall to avoid migrating caribou.

V. CONSULTATION AND COORDINATION

- A. Persons and Agencies Consulted:  
ADF&G Nome, Kotzebue  
Anchorage Field Office  
Kawerak Inc.  
Bering Straits Native Corporation  
Grace Cross Chair, Seward Peninsula Advisory Committee  
Inupiaq Village of Council  
Council Native Corporation  
White Mountain IRA Council  
Nome Eskimo Community  
Sitnasuak Native Corporation  
City of Nome  
City of Golovin  
Golovin Native Corporation  
Southern & Northern Norton Sound Advisory Committee Chairs  
Robert Kauer
- B. Public Comments (Appendix)  
Chinik Eskimo Community  
City of White Moutain  
Robert Hannon  
Tom Gray
- C. List of Preparers:  
Thomas Sparks, Lead Preparer, AFO Nome Field Station  
Chuck Denton, Hydrologist, AFO  
Jeff Denton, Wild Life Specialist, AFO  
Larry Beck, Environmental Protection Specialist, AFO  
James F. Moore, NEPA Coordinator, AFO  
Donna Redding, Archaeologist AFO

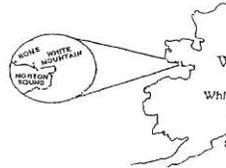
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B. Alaska Wildlife Management Plans, Northwestern Alaska, ADF&G  
C. Persons, K. and P. Bente. 2000. Wolves, Game Management Unit 22. Federal Aid in Wildlife Restoration Management Report. Survey-Inventory Activities July 1996- June 1999. Alaska Department of Fish and Game, Juneau, AK.  
D. Persons, K. and P. Bente. 2000. Moose, Game Management Unit 22. Federal Aid in Wildlife Restoration Management Report. Survey-Inventory Activities 1 July 1997-30

- June 1999. Alaska Department of Fish and Game, Juneau, AK.
- E. Persons, K. 2004. Summary of March 2004 Unit 22B and Unit 22C Moose Population Census. Unpublished. ADF&G, Nome, Alaska.
  - F. ADF&G 2005 Eastern Unit 22B Moose Recruitment Survey March 20 & 22, 2005  
Unpublished report

Appendix

Jul 27 2006 1:03PM BLM Nome Field Office 907-443-3611 p.2



City of  
White Mountain  
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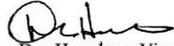
June 23, 2006

Bureau of Land Management  
Anchorage Field Office  
6881 Abbott Loop Road  
Anchorage, Alaska 99507  
ATTN: Thomas Sparks, Natural Resource Program Coordinator

Dear Mr. Sparks;

The City of White Mountain received your letter dated May 31, 2006 regarding the application of one Mr. James Smith of Chugiak, Alaska to authorize commercial guiding operations for Grizzly Bear, Wolf and Wolverine under a Special Recreation Permit (SRP) where a base camp would be located off of Boston Creek with a spike camp located off of the Paragon River areas. A regular City Council meeting was held on June 22, 2006 where members of the community and City Council were able to voice their opinions about this application. After comments were discussed and taken into suggestion a City Council roll-call vote was administered with the results of Mayor, Tom Gray abstaining to vote with the other six Council members voting against the applicant. If anyone has any questions about this decision please contact the mayor or city clerk at (907) 638-3411 or e-mail at [wmocity@gei.net](mailto:wmocity@gei.net). Thank you for your time and please consider our comments.

Sincerely,

  
Dan Harrelson, Vice-Mayor

REC'D JUL 05 2006

**CHINIK ESKIMO COMMUNITY**  
**P.O. BOX 62020**  
**GOLOVIN, ALASKA 99762**  
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June 19, 2006

United States Department of Interior  
Nome Field Station  
Attention AA-086400  
P.O. Box 925  
Nome, Alaska 99762

Dear Mr. Sparks, Natural Resource Program Coordinator:

After initial Chinik Eskimo Community (CEC) review and discussions with tribal members of the application received by BLM from Mr. James Smith of Chugiak Alaska, proposing a new commercial guiding operations with a "Base Camp" at Boston Creek and a "Spike Camp" at Pargon River for Grizzly Bear, Wolf and Wolverine under a "Special Recreation Permit" (SRP) in the State of Alaska Guide Outfitter Area 22-05, the Chinik Eskimo Community is strongly objecting to the approval of SRP AA-086400 for those species. The proposed area is an important subsistence hunting area that helps sustain our nutritional needs and provide limited local economic opportunities from furbearing animals for area residents.

Within Subunit 22B, there are three Registered Guides and an unknown number of Transporters that are able to provide commercial guiding or transporting services for the above species, some of whom are living within the region. The Tribe strongly believes this is a sufficient number of guides working in the area. According to area residents, the population of the brown bears is believed to have stabilized, although ADF&G believes that another guide working in the area would not biologically affect the bear numbers. This spring, there is more than 50% fewer bear encounters than previous years, when it was not uncommon to encounter several brown bears in one trip.

The activities of this SRP could affect the fall migration patterns and winter caribou movement and therefore substantially impact subsistence hunting for the residents of Wt. Mountain, Golovin and Elim. In recent years, moose and some species of fish were in steady decline. In consequence, moose management has changed to reduce harvest, greatly increasing the importance of the harvest of caribou to meet the area residents nutritional needs and traditional and cultural use of furbearing animals.

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The winter and early spring grazing ground (lichen, willows and shrubs) in the McCarthy Marsh area is considered to be very important for the diet of caribou and moose cows. The pregnant caribou cows will be migrating to the calving grounds and lactating during the caribou calving season. A commercial hunt for wolf and wolverine during this time could disrupt caribou grazing and regional efforts to increase moose populations. Most area hunters make every effort not to disturb winter & spring moose by driving around them and/or keeping their distance.

Guided hunts for Wolf and Wolverine could impact and reduce the social, cultural and traditional use of the furbearers. The area harvest is usually done opportunistically while engaged in other activities, keeping the furbearer populations somewhat stable and current harvest levels could be at or near the maximum sustained yield.

- The environment during the winter is extremely pristine looking around the proposed base camp off Boston Creek and the proposed spike camp off Pargon River.
- The BLM or an independent group or agency may need to monitor commercial harvest levels and/or do periodic spot checks to make sure the permittee remain in compliance with the proposed activity/activities.
- The amount of BLM land in the area is in the thousands of acres and in several different parcels.
- The probability of the commercial harvest in lands managed by other agencies or private holdings is relatively high. The commercial harvest can be in direct competition with the Wt. Mountain, Golovin & Elim's traditional and cultural uses of furbearers, in addition, the tribe's history and cultural practices that revolve around the uses could be severely impacted.

If you have any questions or concerns of our comments at any time, please do not hesitate to contact the Chinik Eskimo Community at the above numbers.

Thank you,

  
Eleanor R. Amaktoolik, President  
Chinik Eskimo Community

Jul 27 2006 1:04PM BLM Nome Field Office

907-443-3611

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06-29-2006 16:08 BIG RIVER HUNTING 9632439

PAGE2

June 29, 2006

Tom Sparks  
United States Department of Interior  
Nome Field Station  
Attention: AA-086400  
P.O. Box 925  
Nome, AK 99762

Dear Mr. Sparks,

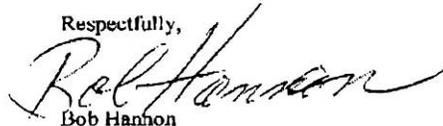
I am writing this letter to express my opposition to BLM authorizing a Special Recreation Permit to James Smith of Chugiak, Alaska. The permit I am opposed to would authorize Mr. Smith to conduct commercial guiding operations for Grizzly Bear, Wolf & Wolverine in Guide Outfitter Use Area 22-05.

The past actions of Mr. James Smith operating in this area have been horrendous. He has already demonstrated a total disregard for the rights of private property and both public and private land ownership. Mr. Smith has conducted illegal guiding operations on the Seward Peninsula for the past several years without the slightest effort to obtain the proper permits in advance. He has repeatedly shown himself to be very reluctant to communicate or cooperate with the Department of Fish & Game, Department of Public Safety or the BLM.

The current Grizzly Bear Drawing Permit Hunt #685 governs both GOUA 22-05 & 22-06 and is already divided among 3 fulltime operators with a 4<sup>th</sup> outfitter presently under consideration. The Grizzly Bear harvest in this area is already at a maximum sustained level and it is increasing difficult to locate trophy quality bears. Given the past history of Mr. James Smith and the current Grizzly Bear harvest situation in 22-05 I must reiterate my extreme opposition to BLM issuing a SRP in 22-05.

I've been a Registered/Master Guide Outfitter for 30 years. I have lived in Koyuk since 1984 and I have held Guide Outfitter Area 22-06 continuously for the past 27 year. My family & I are completely dedicated to the Big Game Guiding Industry. Area 22-06 is on drawing permits for both moose & grizzly bear, every permit our clients draw or don't draw has a direct and immediate affect on our livelihood. We completely object to BLM issuing a commercial hunting permit to James Smith in 22-06.

Respectfully,



Bob Hannon

Jul 27 2006 1:04PM

BLM Nome Field Office

907-443-3611

p. 7



"Tom Gray"  
<tomnbj@starband.net>  
06/29/2006 06:01 PM

To <Tom\_Sparks@blm.gov>  
cc  
bcc  
Subject

Tom,

This is a response to the Special Recreation Permit application for Mr. James Smith in his commercial guiding operation.

I asked BLM to do something about this guide some time ago for guiding without a rec. permit. Just handing him a permit because he has applied for one is wrong. This guide ran an guiding operation up here for years without a permit while the rest of us had one and paid the fees you folks require.

Also he went to court for guiding without the required permits in another area of Alaska and ended up paying fines for doing so. This attitude of abusing the system shouldn't go on.

The resource of bears cannot handle another guide in the area. Five years ago we would see 15 or so bears on a typical hunt. Now we are lucky to see 6 bears of which one bear may be of the class that our hunters we guide are looking for.

Most of us guides that are now operating out here on the Seward Penninsula are locals and work with the land agencies. We also work well with the people in the region. It seems some of the out of area guides break into cabins and use resources they shouldn't.

The Seward Pennsula has a certain number off non resident tags available for guides and folks with kin. There is coming a time soon that we will not be able to get enough permits to run a guiding operation if folks do not start managing this.

The attitude of guides abusing the system needs to stop. Also coming into guide use areas and killing off our resources then moving on to another guide use area needs to stop.

I am sorry Tom but I urge you and fellow staffers to decline this application.

Regards

Tom Gray

# *Alaskan NW Adventures*

*101 Airport Rd.  
White Mountain, Alaska 99784*

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May 18, 2005

Dear Gary Reimer,

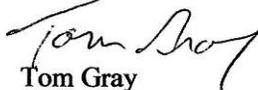
This spring, we had a fella Jim Smith running a guiding operation here on the Seward Peninsula. I asked your Nome BLM Agent, Tom Sparks, if Mr. Smith had the right permit to be operating here. He said no and was looking into the issue.

What are you folks going to do? This guy has been operating here for the past 3 years or so. Us guides have been doing our part in getting Special Recreation Permits and paying the yearly fees to operate on BLM Lands. This fella comes in and walks all over us, ignoring the rules we play by, and when is caught says, "gee I didn't know I needed a permit." This is ridiculous. Prior to operating hunts, it is up to individual guides to address land regulations set by land managers for lands we guide in.

If I break the state laws, my rights to hunt and guide will be taken away from me for some time. Just slapping his hands and telling him to get a Special Recreation Permit will be a slap in the face to the rest of us that have been abiding by the regulations you have set for our industry.

I think Tom Sparks, US Fish and Wildlife Officer Mike Wade, and Trooper Paul Kostou all should be commended for putting together the information you need to do your job in dealing with this problem. I look forward to your immediate action to see this issue resolved.

Regards,



Tom Gray  
Registered Guide # 1085

*email--[tombj@starband.net](mailto:tombj@starband.net)*

*www.akadventure.com*

**RECEIVED**

MAY 24 2005

**Anchorage Field Office**