



Bureau of Land Management

Anchorage Field Office
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**Administrative Determination (AD)/Documentation of NEPA Adequacy (DNA)
Reindeer Grazing Permit**

Applicant: Harry Karmun Sr.
Case File No.: F-30432
AK-040-06-AD/DNA-019

Location:

T. 8 N., R. 21 W., Sections 25-28, 31-36, K.R.M.
T. 7 N., R. 21 W., ALL, K.R.M.
T. 6 N., R. 21 W., Sections 1-6, 7-11, 12 N1/2,SW1/4, 13
W1/2,SW1/4, W1/2SE1/4, 19-23, 24 NW1/4, W1/2NE1/4,
N1/2SW1/4, 26 W1/2NE1/4, N1/2SW1/4, 27-33, K.R.M.

Prepared By:

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Natural Resource Program Coordinator
2/21/06

Administrative Determination (AD)
Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)
U.S. Department of the Interior - Bureau of Land Management
Anchorage Field Office

A. BLM Office: Anchorage Field Office **Lease/Serial Case File No.:** F-30432

Proposed Action Title/Type: Reauthorization of Reindeer Grazing Permit for a four (4) year period/4300

Location of Proposed Action: Traditional boundary of the Karmun Reindeer Grazing Allotment described as:

Beginning on the north shore of Kotzebue Sound at the mouth of the Inmachuk River; thence southerly along the western limit of the Inmachuk River to its confluence with the Pinnell River to Fairhaven Ditch; thence southerly along the northern limit of Fairhaven Ditch to its origin in Imuruk Lake; thence southwesterly to the northeast corner of the lava flow (adjacent to the Rhododendron Cone); thence southerly along this eastern limit to its intersection with the Koyuk River; thence downstream in a southerly direction along the western limit of the Koyuk River to its confluence with Caviar Creek; thence southerly along the western limit of the western most tributary continuing on through its headwaters to the first ridge being the Continental Divide and the Bering Land Bridge National Preserve (BELA) boundary; thence westerly and the described boundary of BELA and the Continental Divide to the northeast corner of Township 4 North, Range 28 West, Kateel River Meridian, thence northwesterly following the Continental Divide to the ridge top separating Hot Springs Creek and the westerly limit of Humboldt Creek; thence northerly to the east limit of Pish Creek; thence northerly following the east limit of Pish Creek to its mouth at Karmun Bay.

Description of the Proposed Action

The proposed action is to renew a Reindeer Grazing Permit to Mr. Harry Karmun Sr. from 1/4/06 to 12/31/09, a four (4) year period, in accordance with the Memorandum of Understanding (MOU, AK 025-2003-05) signed between the Bureau of Land Management, National Park Service and State of Alaska Department of Natural Resources.

Applicant (if any): Harry Karmun Sr.

B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans

The proposed action is consistent with the Northwest Management Framework Plan completed in 1982. The objective for range management of the Northwest Management Framework Plan was to encourage proper utilization of range by livestock. Reindeer grazing was recognized as an important use by livestock on public lands. Conflicts between reindeer and caribou were identified by allowing for adjustments of reindeer allotment boundaries and/or designating non use areas to avoid conflict with caribou winter range. The area of potential conflict concern at the time of the Plan was east and west of the Buckland River. The Northwest Management Framework Plan also called for the development of an Allotment Management Plan to support objectives to maintain and improve the range resource and reduce fire control costs. Only one Allotment Management Plan has ever been signed, that of Mr. Henry, for the lands near Koyuk.

C. Identify applicable NEPA documents and other related documents that cover the Proposed Action.

EA-070-92-15, DNA AK-020-96-052 and the MOU, AK 025-2003-05

D. NEPA Adequacy Criteria

- 1. Is the current Proposed Action substantially the same action (or is a part of that action) as previously analyzed? Is the current Proposed Action located at a site specifically analyzed in an existing document?**

The proposed action is identical as that analyzed in EA-070-92-15. The proposed action is located on the same lands as previously analyzed.

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

The range of alternatives analyzed in of EA No. AK-070-92-15 is appropriate with respect to the proposed action given current circumstances. The Karmun family has been in the reindeer business since 1962. In the past 10 years, the Karmun herd has declined to a manageable zero due to the relatively recent westerly migration of the Western Arctic Caribou Herd (WACH) onto the Seward Peninsula in the winter months. The Karmun herd was struck hard during 1999 and 2000 when the western front of the WACH ranged unto the Karmun traditional grazing area. The BLM lands within the Karmun Grazing Allotment

area are minor, comprising less than 50,000 acres out of approximately 1.2 million acres. The National Park Service has issued a Special Use Permit to Mr. Karmun for a four year period (1/4/06-12/31/09). The adjacent landowner, NANA Regional Corporation has issued a letter of non objection on its selected lands currently under BLM management. Other than intermittent use as winter caribou range, there are no competing resource values, environmental concerns or interests in the BLM administered lands.

3. Is the existing analysis valid in light of any new information or circumstances?

Although the WACH had entered onto the Seward Peninsula when EA-070-92-15 was completed, only in 1999 and 2000 did the WACH overtake the Karmun range. Given the cyclical nature of the WACH and its traditional wintering grounds within the far eastern Seward Peninsula the existing analysis is appropriate given the over 40 year history of the Karmun's use of the range for reindeer herding activities over that of the competing WACH interests. The existing analysis acknowledged the potential for overgrazing of vegetation (lichen) and the potential impact on the plant ecosystem.

4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current Proposed Action?

The methodology and analytical approach used in the existing EA is appropriate for the current proposed action.

5. Are the direct and indirect impacts of the current Proposed Action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document analyze site-specific impacts related to the current Proposed Action?

The direct and indirect impacts of the proposed action are substantially unchanged from those identified in the existing EA. Analyzing the impacts of the proposed action under a new EA would result in the same conclusions drawn by the existing EA. The existing EA addresses the critical elements and sufficiently analyzes site-specific impacts of the proposed action by addressing impacts related to soils, vegetation, cultural resources, socioeconomic conditions, terrestrial wildlife, wastes, hazardous substances, and subsistence.

6. Are the cumulative impacts that would result from implementation of the current Proposed Action substantially unchanged from those analyzed in the existing NEPA document(s)?

The cumulative impacts that would result from implementation of the current proposed action would have the same results as those analyzed in the existing EA.

7. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current Proposed Action?

The existing EA was publicized in the Anchorage Daily News on 9/1/92. Agencies consulted for the existing EA included NANA Regional Corporation, National Park Service, State of Alaska, Departments of Fish and Game, Habitat Division, Division of Land management, and Division of Intergovernmental Coordination.

E. Interdisciplinary Analysis:

The following individuals of the Anchorage Field Office and their disciplines were consulted in the analysis of the proposed action:

*ACECs	Kelley
*Air Quality	Chuck Denton
*Cultural Resources (Paleontology)	Redding
*Environmental Justice	Sparks
*Farmlands, Prime/Unique	Lead Preparer
Fire	Sterbenz
Fisheries	Scott
*Floodplains	Chuck Denton
Forestry	Sterbenz
Iditarod Trail	Svejnoha/Schlapfer
*Invasive, Nonnative Species	Kelley/Seppi
Land Status	Sparks

Lands/Realty	Realty Specialist
Minerals	Persson
*Native American Religious Concerns	Redding
Recreation	Ballou
Soils	Kelley
*Subsistence	Jeff Denton
Surface Protection	Kelley
*T&E Species	Seppi
Vegetation	Kelley
Visual Resources	Ballou
*Wastes, Hazardous/Solid	Beck
*Water Quality, Surface & Ground	Chuck Denton
*Wetlands/Riparian Zones	Seppi
*Wild & Scenic Rivers	Ballou
*Wilderness	Ballou
Wildlife	Seppi

F. Mitigation Measures:

Mitigation measures enacted by the National Park Service, under Permit # ARO WEAR 2600 002, “conditions of permit” and “Additional Conditions of the Karmun Reindeer Grazing Permit” are recognized by the BLM as per the MOU.

G. Conclusion

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the Proposed Action and constitute BLM's compliance with the requirements of NEPA.

Gary Reimer
Anchorage Field Manager

May 1, 2006
Date