



## U.S. Department of the Interior Bureau of Land Management

Anchorage Field Office  
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Anchorage, Alaska 99507

<http://www.blm.gov/ak/st/en/fo/ado.html>

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### Environmental Assessment

**Applicant:** Learn To Return – Survival Training Systems, Inc.

**Case File No.:** AA-084078

AK-010-08-EA-016



#### **Location:**

T 12 N., R. 3 W., Seward Meridian  
Campbell Tract, Anchorage, Alaska

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Outdoor Recreation Planner  
February, 2008

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**1.0. INTRODUCTION**

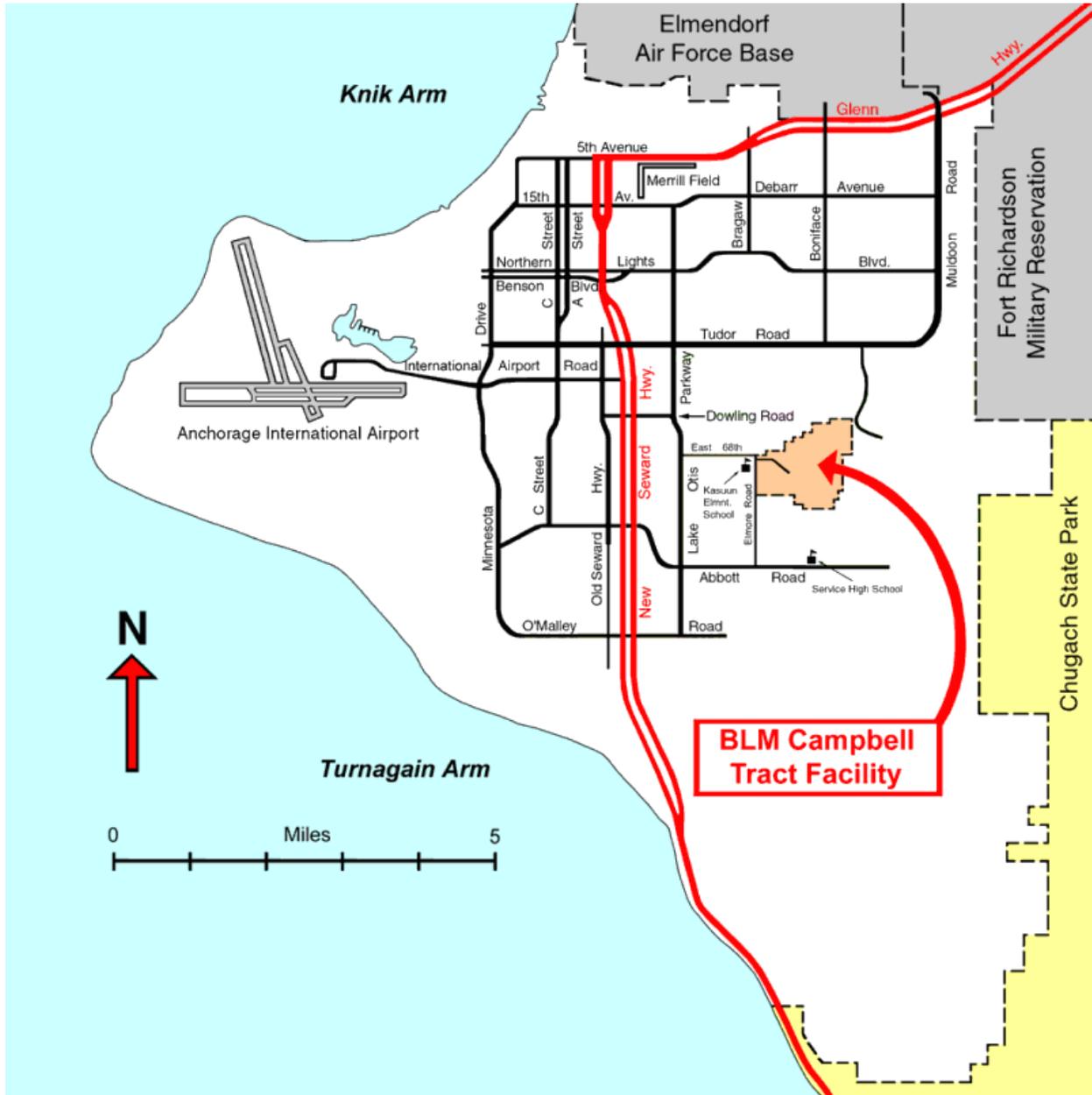
The Bureau of Land Management’s Campbell Tract, a 730-acre parcel of Federal public land on Anchorage’s southeast side, provides the public with outdoor recreational opportunities in convenient proximity to the city’s urban environment. The Tract includes over 12 miles of developed trails, an environmental education center, a complement of resident wildlife, and substantial areas of intact coastal boreal forest and associated terrain.

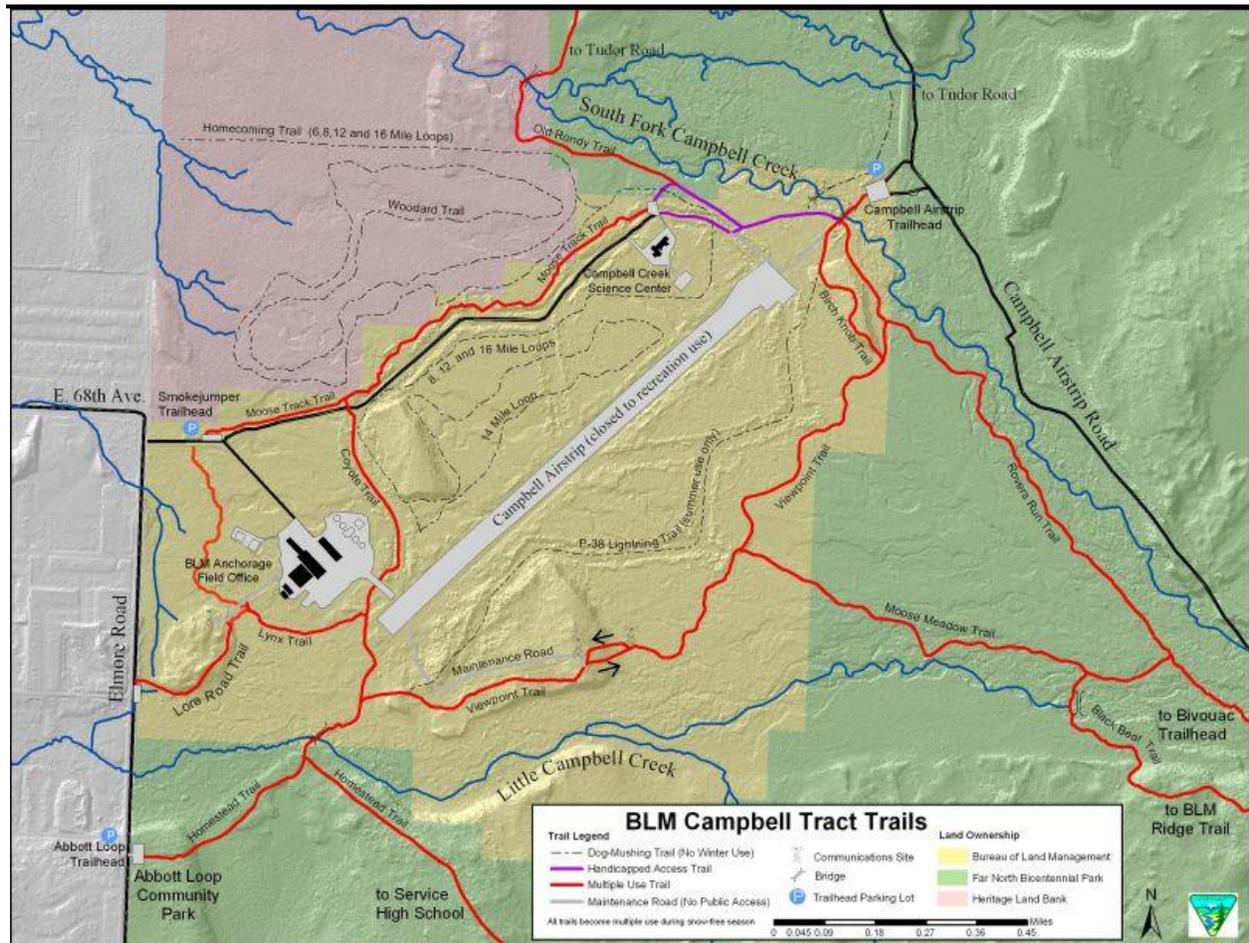


In addition to casual public use, private groups conduct various outdoor educational programs on the Tract. Learn To Return – Survival Training Systems, Inc. of Anchorage utilizes the Tract to provide students an outdoor classroom environment to develop and hone skills in: Arctic Land Survival; Field Survival Skills; Land Navigation and orienteering; Rough land Travel Techniques; Survival Medicine and Rescue; and other outdoor disciplines.

**1.1. Land Status**

The Campbell Tract is withdrawn from the Federal public domain for use by the Bureau of Land Management, *Public Land Order 7471*, dated 2/11/2002.





## 1.2. Relationship to Statutes, Regulations, Policies, Plans or Other Environmental Analyses

### 1.2.1. Statutory and Regulatory Authority

The Federal Land Policy and Management Act directs the Secretary of the Interior to manage the public lands under principles of multiple use and sustained yield through the issuance of permits or other appropriate legal instruments while preventing unnecessary or undue degradation of the lands, 43 U.S.C. §1732(b). Recreational use of the public lands is within that management authority, 43 U.S.C. §1701(a)(8).

The Federal Land Recreation Enhancement Act authorizes the Secretary of the Interior to issue Special Recreation Permits (SRP) for *specialized recreational use* of public lands, 16 U.S.C. §6802(h).

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The implementing regulations of the Federal Land Recreation Enhancement Act require a Special Recreation Permit for commercial recreational use of the public lands, 43 CFR §2932.11. Commercial recreational use is defined as:

*Commercial use* means recreational use of the public lands and related waters for business or financial gain.<sup>1</sup>

(1) The activity, service, or use is commercial if—

(i) Any person, group, or organization makes or attempts to make a profit, *receive money*, amortize equipment, or obtain goods or services, *as compensation from participants* in recreational activities occurring on public lands led, sponsored, or organized by that person, group, or organization;

(ii) Anyone collects a fee or receives other compensation that is not strictly a sharing of actual expenses, or exceeds actual expenses, incurred for the purposes of the activity, service, or use;

(iii) There is paid public advertising to seek participants; or

(iv) Participants pay for a duty of care or an expectation of safety.

[Emphasis added, 43 CFR §2932.5]

As Learn To Return receives money as compensation from participants in recreational activities occurring on the Tract, the Secretary of the Interior is required to manage its *specialized recreational use* of the Tract through the issuance of a Special Recreation Permit.

## **1.2.2. Plans**

### **1.2.2.1. Resource Management Plans**

The Tract is within the planning area of BLM-Alaska's Ring of Fire Resource Management Plan. The Ring of Fire Resource Management Plan provides land use guidelines for consideration when determining the propriety of authorizing *specialized recreational use* of the Tract, 43 CFR 1610.8 (a).

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<sup>1</sup> Commercial use in this context does not contemplate an irreversible, irretrievable or long-term commitment of resources such as gravel extraction or the harvest of forest products. Rather, commercial use in this context is incidental and secondary to recreational use and a temporary, short term non-consumptive use of resources.

**1.2.2.2. Other Pertinent Plans**

The Tract is also within the boundary of BLM-Alaska's:

- *A Management Plan for Public Use and Resource Management on the Bureau of Land Management Campbell Tract Facility*, dated June 1988.

**1.2.3. Environmental Analysis**

The National Environmental Policy Act of 1969 requires that the BLM analyze the environmental effects of activities it authorizes on the public lands to determine whether they will have a significant affect on the quality of the human environment, 42 U.S.C. §4332. In managing the environment, the BLM is required to "... meet the present and future needs of the American People ...," 43 U.S.C. 1702 (c), while preventing "... unnecessary or undue degradation of the lands," 43 U.S.C. §1732(b). In Alaska the BLM is also required "... to cause the least adverse impact possible on rural residents who depend upon subsistence uses of the resources of [the public] lands ...," 16 U.S.C. §3112(1).

Effects on the land, rural residents and the resources upon which they rely and the affect on the quality of the human environment associated with Learn To Return's *specialized recreational use* of the Tract were previously analyzed in environmental documents: AK-040-93-003, dated December, 1992; AK-040-98-008, dated April, 1998; and AK-040-03-EA-004, dated February, 2003.

This document is intended to reassess the effects on the land, rural residents and the resources upon which they rely and the affect on the quality of the human environment associated with continued authorization of Learn To Return's *specialized recreational use* of the Tract.

**1.3. Plan Conformance**

The Tract is within the planning boundary of BLM-Alaska's Ring of Fire Resource Management Plan. The Ring of Fire Resource Management Plan was approved by BLM-Alaska's State Director on March 21, 2008. The Ring of Fire Resource Management Plan incorporates the provisions of *A Management Plan for Public Use and Resource Management on the Bureau of Land Management Campbell Tract Facility* (BLM June, 1988) as management guidance for the authorization of public use of the Tract.

The June 1988 Tract management plan acknowledges that “... opportunities exist for commercial recreation ...,” on the Tract. Further, the plan promotes environmental education as a legitimate use of the Tract,

Authorize environmental education group uses of the tract in Zone  
3. Limit organized group uses of the CT to environmental  
education activities.

[Part IV: The Management Program, Paragraph C.2.  
Action EE-2 Environmental Education Events]

Learn To Return’s specialized recreational use of the Tract is in conformance with the A Management Plan for Public Use and Resource Management on the Bureau of Land Management Campbell Tract Facility (BLM June, 1988).

#### **1.4. Purpose and Need for the Proposed Action**

Learn To Return is in need of a natural, wilderness-like setting in which its students can familiarize themselves with and reinforce wilderness survival techniques taught to them in a formal classroom environment.

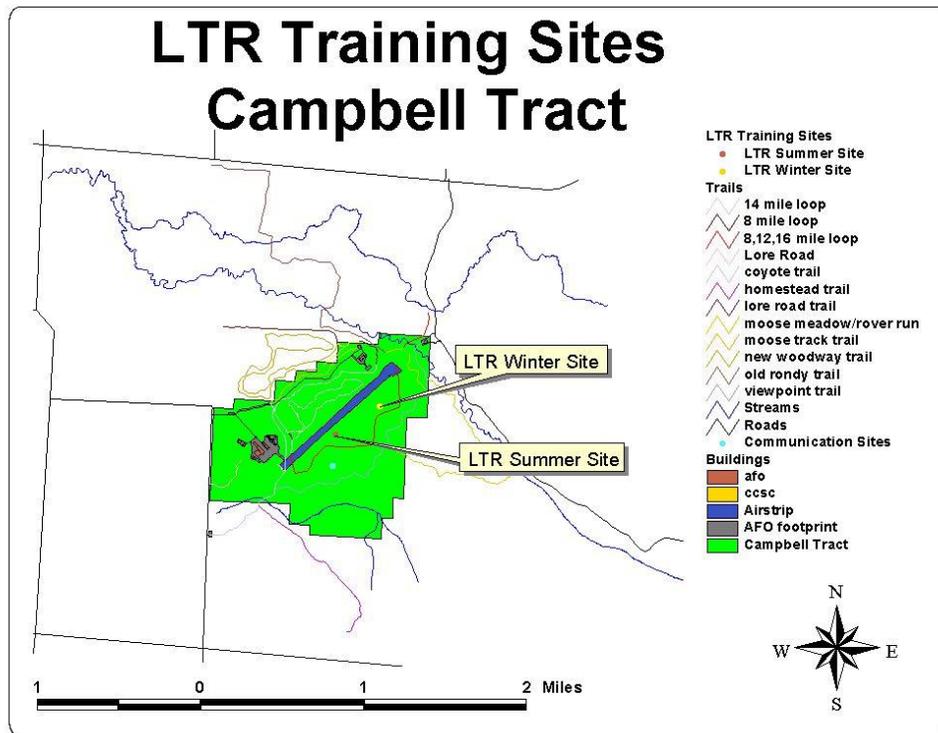


**2.0. PROPOSED ACTION AND ALTERNATIVES**

**2.1. Proposed Action – continuance of prior authorizations**

The BLM proposes to continue to manage and facilitate Learn To Return’s *specialized recreational use* of the Tract through the issuance of a Special Recreation Permit that will incorporate appropriate provisions aimed at preventing unnecessary or undue degradation of the lands and protection of resources.

Learn to Return, would like to hold approximately 25 outdoor education field training sessions on the Tract each year. Each session would provide no more than 25 students with an opportunity to gain some familiarity with wilderness survival techniques taught them in a formal classroom setting. Historically, Learn To Return has used two sites on the Tract for this purpose.



Learn To Return will utilize a day-use site located just east of the Tract’s airstrip to demonstrate outdoor and survival skills including emergency shelter construction, map reading and orienteering, emergency fire building, food and water procurement, signaling, and emergency first aid.

The first site's area of use is approximately 45 feet in diameter. During each field training session, each class participant will construct a single, small fire in a fire pan from downed and dead organic materials collected on site. One larger fire would be authorized per session to demonstrate fire-building techniques to the group. This fire will be constructed on a fireproof surface and fire fuels will be composed of Alaska native vegetation that has been brought onto the Tract. All evidence of these fires will be removed from the Tract at the end of each session.

Learn To Return will utilize a second site also located east of the Tract's airstrip, but 500 yards north of the day-use site. The second site will be used for approximately five overnight field sessions during the winter snow season to demonstrate emergency camping skills. The site is approximately 75 feet in diameter. Learn To Return intends to build a sample emergency lean-to shelter on the site out of Alaska native spruce boughs brought onto the Tract. To reduce transportation impacts on the site, Learn To Return will maintain the sample shelter at the site for use during multiple sessions and seasons, depending on the quality of the structure. In addition to receiving the same training as provided at the day-use site, participants at this site will construct temporary emergency shelters from spruce poles and spruce boughs brought onto the Tract by Learn To Return. Participants at this site will overnight in the temporary shelters. The temporary shelters will be dismantled at the end of each training session.



During the non-snow season, all litter will be removed from the sites at the end of each training session. Reasonable efforts will be made to remove waste from snow-season training sites at the end of each training session. Learn To Return will perform a clean-up of both sites by June of each year to remove all litter, lost gear, and discarded construction materials revealed after snowmelt. Participants will be required to use small portable toilets for all overnight sessions, and all human waste will be removed from the Tract at the end of each training session.

Learn To Return plans to demonstrate emergency hand-held and aerial flare signaling devices on the Tract when fire danger is low. These devices will be ignited at a cleared location east of the airstrip that has been designated by the authorized BLM representative. Flare and fire use will not be permitted during municipal fire ban periods. When flare use is permitted, Learn To Return will notify the following agencies on the day of the training to prevent the flares from being misinterpreted as bona-fide civilian emergencies: Alaska State Troopers, Municipality of Anchorage Fire Dispatch, Municipality of Anchorage Police Department, Chugach State Park, FAA - Ted Stevens' International Airport, FAA Merrill Field, and the BLM Unit Aviation Manager.



Learn To Return instructors and students will access the interior of the Tract utilizing the Campbell Creek Science Center Road. Parking will be authorized in the Campbell Creek Science Center's visitor parking lot. Learn To Return will be issued a key to the Campbell Creek Science Center's gate for weekend access and are prohibited from any entry through the Campbell Creek Science Center's gate during non-business hours without specific, pre-authorized approval from the BLM representative.



**2.1.1. Issues of environmental concern**

1. Competing use amongst recreational users of the Tract.
2. Introduction of invasive, non-native species through the importation of plant material onto the Tract.
3. Wildfire hazard from the use of flares and fire.
4. Vegetation damage from trampling, snow compaction and use of live vegetation.
5. Wildlife harassment and disturbance.

**2.2. Alternative B: No action alternative – discontinuance of prior authorizations**

Under this alternative, the BLM would discontinue its authorization of Learn To Return's *specialized recreational use* of the Tract. This alternative would fail to manage and facilitate responsible *specialized recreational use* of the Tract.

Further, it is reasonable to postulate that failure to authorize Learn To Return's *specialized recreational use* of the Tract may result in Learn To Return relocating to other sites. Although such a scenario may result in prevention of unnecessary or undue degradation of BLM lands and protection of their resources, it may not avoid or minimize adverse impacts on the quality of the human environment as it would visit those impacts on other lands.

### **3.0. AFFECTED ENVIRONMENT**

The Tract is located in the Cook Inlet Taiga ecoregion. The boreal forest ecosystem is predominant. The ecosystem is permafrost based and is comprised of forests, wetlands, bogs, fens, peatlands, rivers and lakes. Soils are cold and often very shallow. Water tables are high. Growing seasons are short. Biological processes are slow. Nutrient availability is low. Native plants and animals have adapted to life under harsh climatic conditions. It is a relatively sensitive place, easily damaged.

The ecoregion surrounds the upper reaches of Cook Inlet in south central Alaska, and is surrounded by the mountains. It is level to rolling, with areas of ground moraine and stagnant ice topography, drumlin fields, eskers, and outwash plains. Most of the lowland is less than 500 ft (150 m) above sea level, with a local relief of 50-250 ft (15-80 m). Soils are formed with wind-blown loess from the glacial floodplains and with volcanic ash from mountains to the west. The soils lie on top of glacial deposits. Spodosols are the principal upland soils.

Although the climate is subarctic, it is less severe than the interior of Alaska, because the region is sheltered by the Alaska Range to the north. Proximity to the Gulf of Alaska makes the climate transitional to the marine climates to the south. Average annual temperatures range from 32 to 39F (0 to 4C), with a winter average of about 5F (-15C) and summer maximums of about 64F (18C). Average annual precipitation ranges from 10 to 18 in (260 to 460 mm). Annual snowfall averages from 4 to 10 in (100 to 260 mm).

Its relatively mild climate, level to rolling topography, and coastal position has contributed to the wide variety of vegetation communities found in the ecoregion. The most widespread are coniferous, broadleaf, and mixed forests, dominated in differing combinations by black spruce (*Picea mariana*), white spruce (*P. glauca*), Sitka spruce (*P. sitchensis*), quaking aspen (*Populus tremuloides*), balsam poplar (*P. balsamifera*), black cottonwood (*P. trichocarpa*) and paper birch (*Betula papyrifera*) (Gallant et al. 1995). Lowland spruce-hardwood forests are abundant. Bottom land spruce-poplar forest adjoins the larger river drainages, along with thickets of alder and willow. Wet tundra communities exist along the coastline. White spruce forests occur on southfacing gravelly moraines, and cottonwood-tall bush communities are common on large floodplains. Other important

communities include low scrub, tall scrub, low scrub bog, mesic graminoid, graminoid herbaceous, and wet forb herbaceous communities.

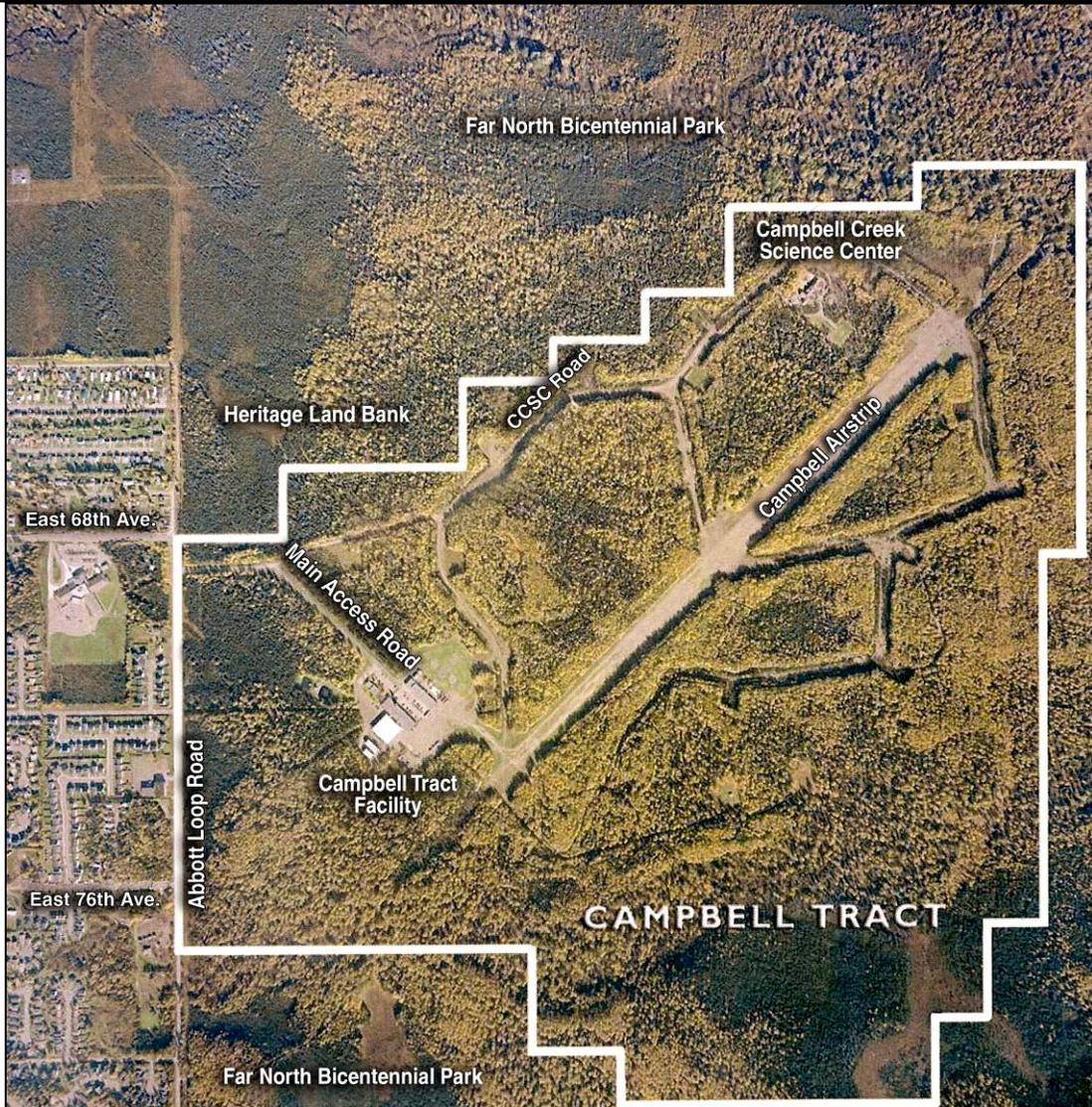
This ecoregion probably has experienced the most extensive human disturbance and alteration in Alaska. Nevertheless, it remains approximately 90 percent intact, and still supports all of the top level terrestrial predators within, or close to, their natural ranges of variation. (These predators include brown bear (*Ursus arctos*), wolf (*Canis lupus*), wolverine (*Gulo gulo*), and coyote (*Canis latrans*.) The diversity of habitats supports a large variety of species. Muskrats and red foxes abound, moose flourish in lowland areas, and Dall sheep are frequently seen in the uplands. Black bear populations are dense throughout the region.

The ecoregion also produces all five species of Pacific salmon, which support a wide range of terrestrial species as well as large commercial, sport, and subsistence fisheries.

Wildfire occurrence is moderate to high (especially in dry years), and fires range in area from 1 ha to 22.7 km<sup>2</sup>, averaging 1.6 km<sup>2</sup> (Gallant et al. 1995). Spruce bark beetle is also a common disturbance in the forests of this ecoregion. A current infestation has reached all parts of the ecoregion with up to 80 percent of the mature spruce in many stands killed. The spruce bark beetle is naturally occurring and may be the most important cause of stand renewal in the ecoregion.

Most human disturbance is concentrated in urban and residential development of the lower Kenai River, Anchorage Basin, and Palmer-Wasilla area. Some agriculture occurs in Palmer and Point McKenzie, across Knik Arm from Anchorage. Other forms of human land use include timber harvest and oil and gas exploitation on the Kenai Peninsula and across Cook Inlet from Anchorage.

The Tract was under Department of Defense jurisdiction during World War II. A 5,000 (acre?) Army garrison was stationed at the Tract, which then included an air field, barracks, an officer's quarters, a recreation hall, a mess (hall?), an aid station and several storage huts. While there are few remnants of these facilities, the airstrip and taxiways are essentially the same as when they were constructed in 1942. The airstrip is in use today by the BLM to support field operations.



**3.1. Critical Elements of the Human Environment**

The following discussion is organized around the Ten Significance Criteria described in 40 CFR §1508.27 and incorporated into BLM’s 14 Critical Elements of the Human Environment list (H-1790-1), and supplemental Instruction Memorandums, Acts, Regulations and Executive Orders. There is a fifteenth Critical Element of the Human Environment for consideration by BLM-Alaska, Subsistence, ANILCA Title VIII, Sections 801 and 802.

### **3.1.1. Unaffected Critical Elements of the Human Environment**

The following Critical Elements of the Human Environment have been analyzed and are either not present or will not be affected by the Proposed Action or the No Action Alternative:

1. Air Quality  
None anticipated.
2. Areas of Critical Environmental Concern  
None present.
3. Cultural Resources  
Historic resources from the World War II era are scattered throughout Campbell Tract. The Campbell Garrison (AHRS # ANC-01384) is situated on the grounds of Campbell Tract. The garrison and airstrip were developed in 1942 as one of four 5,000 foot long satellite airfields associated with Fort Richardson. In 2004 the Campbell Garrison was determined eligible to the National Register of Historic Places. There are no known prehistoric cultural resources on the Tract.

The areas of potential effect from the Proposed Action and the No Action Alternative do not lie within the historic WWII footprint and neither should have an impact on the resources.

4. Environmental Justice  
Not pertinent.
5. Farmlands (Prime or Unique)  
None present.
6. Flood Plains  
None present.
7. Native American Religious Concerns  
There are no known Native American Religious Concerns.
8. Subsistence, ANILCA Title VIII  
The lands comprising the Tract are Federal public lands as defined by ANILCA Section 102(3) and fall under the regulatory authority of the Federal Subsistence Board. The Tract is in the Anchorage Management Area, Game Management Unit 14C. In accordance with the provisions of the Subsistence Management Regulations for the harvest of Wildlife on

Public Lands in Alaska, the Anchorage Management Area is closed to the subsistence taking of wildlife. Subsistence use of fishery resources is unaffected by the Proposed Action.

Therefore, with regard to Tract, neither the Proposed Action nor the No Action Alternative will significantly restrict Federal subsistence use, decrease the abundance of Federal subsistence resources, alter the distribution or movement of Federal subsistence resources, or limit qualified Federal subsistence user access from currently existing conditions and no further subsistence analysis is necessary.

9. Threatened & Endangered Species

There is no reason to believe that:

- a. an endangered or a threatened species is present in the area affected by the proposed action;
- b. implementation of the proposed action will jeopardize the continued existence of an endangered or threatened species;
- c. implementation of the proposed action will result in the destruction or adverse modification of critical habitat of such species;
- d. implementation of the proposed action will jeopardize the continued existence of any species proposed to be listed as endangered or threatened;
- e. implementation of the proposed action will result in destruction or adverse modification of critical habitat proposed to be designated for such species;

therefore, no consultation with the U.S. Fish and Wildlife Service is considered necessary pursuant to Section 7 of the Endangered Species Act of 1973, 16 U.S.C. §1536.

10. Wastes, Hazardous/Solid  
None anticipated.

11. Water Quality, Surface/ground  
No impacts to water quality, either surface or ground, are anticipated.

12. Wetlands/Riparian Zones  
No impacts to wetlands or riparian zones are anticipated.

13. Wild and Scenic Rivers  
There are no Wild and Scenic River designations on the Tract.

14. Wilderness

There are no Wilderness designations on the Tract.

**3.1.2. Affected Critical Elements of the Human Environment**

The following Critical Element of the Human Environment may be affected by the Proposed Action or the No Action Alternative.

**3.1.2.1. Invasive, non-native species**

An invasive non-native plant survey was conducted at Campbell Tract in 2006.<sup>2</sup> The following is an excerpt from the survey' abstract:

A total of 136 infestations were recorded in the surveys, with 20 Alaska BLM listed invasive plants. An additional 11 non-native plant species were observed. Weed infestations occupied an estimated 165 acres of Campbell Tract. The most commonly encountered invasive plants were white clover (*Trifolium repens*), alsike clover (*Trifolium hybridum*), narrow leaf hawksbeard (*Crepis tectorum*), white sweetclover (*Melilotus alba*), and timothy (*Phleum pratense*). These species were present on most roadsides, the airstrip, and most trails, and in a few cases had established in woodland habitats. Large and nearly continuous populations are present for these species except white sweetclover and timothy, which are composed of numerous, yet small and controllable, infestations. A few small infestations of more problematic invasive species were also located. Orange hawkweed (*Hieracium aurantiacum*), butter and eggs (*Linaria vulgaris*), brittlestem hempnettle (*Galeopsis tetrahit*), and oxeye daisy (*Leucanthemum vulgare*) are highly invasive species that were found in largely undisturbed woodlands. Two individuals of European bird cherry (*Prunus padus*) were found along Campbell Creek.

The Amber-marked Birch Leaf Miner (*Profenusa thomsoni*), a small insect introduced into the Anchorage area from Europe in the mid 1990's, has infected many of the birch trees in Anchorage, including those on Campbell Tract.

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<sup>2</sup> <http://akweeds.uaa.alaska.edu/pdfs/literature/Summary%20CampbellTractWeedInventoryNov2006.pdf>

### **3.2. Non-critical Elements of the Human Environment**

The following Non-critical Elements of the Human Environment may be affected by the Proposed Action or the No Action Alternative.

#### **3.2.1. Competing use**

The proximity of the Tract to Anchorage places a high demand on the site for recreational use. Recreational use is primarily focused on year round trail use. Trails developed on World War II tank roads and airplane taxiways are linked to a city's trail systems on adjoining park lands.

Access to the Tract's trail system is gained from two on-site trailheads and five trails from the city's park lands. Established trailheads, with parking, include the Smoke Jumper Trailhead located at the main entrance to the Tract and the Campbell Airstrip Trailhead located at mile 1.1 on Campbell Airstrip Road.

Recreational users of the Tract are primarily residents of Anchorage and surrounding communities. Many users live close to the Tract and use the area regularly for exercise, often with their family dogs. Tract visitation in 2007 exceeded 95,000 visits. Recreational use of the Tract includes walking, running, mountain biking, skiing, snowshoeing, dog mushing and horseback riding throughout the Tract.

Regular competitive events, often starting on the city's park lands traverse the Tract including the Nordic Ski Club's Tour of Anchorage and National and World Sled Dog Championship Races.

Trail maintenance, signing, and event permitting is a cooperative effort between the BLM, the city's Parks and Recreation Division, and various volunteers and user groups. The use of motorized vehicles on the Tract is prohibited.

#### **3.2.2. Vegetation**

The Tract contains a variety of habitats including spruce and birch forests, bogs, and riparian areas. Cottonwood and birch dominate the woodlands, interspersed with less mature white spruce. Old growth spruce has experienced high rates of recent beetle kill. The under-story is comprised of shrubs, forbs, lichens and moss above a ground cover of heavy organic litter.

#### **3.2.3. Wildfire**

The Tract is adjacent to the city's 4,000 acre Far North Bicentennial Park. Together, the Tract and the Far North Bicentennial Park form a contiguous piece of natural public and park land linking the high mountains of Chugach State Park

to the heart of Anchorage.

These forests are in a state of transition. Many of the birch and spruce trees are over mature and are going through a successional stage where the canopy opens as the older trees die and fall.

The recent spruce bark beetle epidemic has also created additional openings in the forests. These forested areas along Anchorage's wildland urban interface, with acres of dead spruce trees, pose a threat of wildfire to the community as fuels continue to accumulate.

Half of Alaska's population lives in the Municipality of Anchorage. In 2001, Anchorage was declared a community at risk for wildfire by the U.S. Forest Service.

#### **3.2.4. Wildlife**

The Tract contains a rich diversity of resident and non-resident wildlife. Resident species include moose, porcupine, mink, weasel, red squirrel, muskrat, beaver, snowshoe hare, voles, and shrews and at least 50 species of resident and non-resident birds including 40 species of land birds, horned owl, northern saw-whet owl, boreal owl, northern goshawk, and spruce grouse. Many species move seasonally through the Tract to and from the Chugach Mountains and include grizzly bear and black bear, red fox, lynx and wolf. The South Fork of Campbell Creek traverses the northeast corner of the Tract. This stream supports populations of king and silver salmon, as well as rainbow trout, dolly varden, and spiny sculpin.

Recent ADF&G research on the habitat use, movement and food habits of brown bears has shown a minimum of 20 brown bears inhabit the North and South fork of Campbell Creek, and the home ranges of 4 adult brown bears are known to overlap Salmon Loop trail where Trailside educational activities are conducted (Farley et. al. 2008). The study showed that some bears in the area are highly reliant on major and minor trails during the summer months. The proximity of bears to trails and streams decreases from about the end of June thru July/early August. Several bears were found to maintain minimum distances of less than one kilometer to salmon streams for several week-long periods. Within any given day those bears are often within 10 meters from the streamside. Additionally, most of the brown bears displayed a strong dependence on access to salmon streams. Females tend to approach salmon streams perpendicular to the stream channel, possibly to minimize encounters with other bears, while males tend to patrol parallel to streams.



The presence of many bears attracted to seasonal food concentrations, coupled with expanding development along salmon spawning streams, and increasing human activity in parks and other natural areas, will increase the probability of bear-human interaction occurring..

#### **4.0. ENVIRONMENTAL CONSEQUENCES**

##### **4.1. Impacts of the Proposed Action – continuance of prior authorizations**

##### **4.1.1. Critical Elements of the Human Environment**

###### **4.1.1.1. Invasive, non-native species**

Although the Tract has experienced a high degree of invasive, non-native plant infestations, the importation of off site plant material increases the risk of further infestations.

##### **4.1.2. Non-Critical Elements of the Human Environment**

###### **4.1.2.1. Competing use**

Recreational users of the Tract are often seeking solitude and quiet in an effort to escape the noise and congestion of Anchorage. Training and camping activities near multi-use trails will visually impact upon the visitor experience and reduce this sense of peace and solitude. Users viewing training sites may gain a false

impression that public camping and fire building is permitted on the tract. Training activities may also increase noise levels for users if conducted near multi-use trails.

**4.1.2.2. Vegetation**

Vegetation will be damaged from trampling and snow compaction. Trails leading to and from course sites may be visible from access areas. Other users may follow these foot trails to training sites causing increased trampling and impacts to areas of sensitive habitat or vegetation. Some individual tree branches may suffer damage from being cut by students.

**4.1.2.3. Wildfire**

The use of fire on the Tract, particularly in the dry season, poses a risk of wildfire not only to the Tract but to the Anchorage community.

**4.1.2.4. Wildlife**

Outdoor training sessions may have local, short-term impacts on wildlife. In winter months, moose, snowshoe hare and other animals that browse and use forested habitats may be temporarily displaced.

Populations of birds and mammals may be impacted by training activities that occur in the animals feeding or reproductive habitat. Birds may not reproduce or leave the area for the season if disturbed during breeding season. Wildlife encounters may occur in all seasons. Of particular concern on CT is the opportunity for potentially dangerous wildlife encounters including moose, black bear and brown bear. Recent research conducted by the Alaska Department of Fish and Game and summarized in April of 2008 and discussed above has revealed that a brown bear population of a minimum of 20 individuals are summer residents on Campbell Tract and Far North Bicentennial Park in the riparian zones of both the North and South Forks of Campbell Creek. This population is resident for the duration of the salmon season in these creeks and can be expected to be encountered anytime between May 15 and November 15 in the vicinity of Campbell Creek. Because the training sessions are not occurring within the vicinity of Campbell Creek and most training sessions occur outside the salmon spawning season, the potential for dangerous brown bear encounters is reduced. In addition operators on CT are required to adhere to the established CCSC risk management and health and safety policies including the Wild Animal Response Policy for Campbell Tract (Appendix A).

**4.1.3. Cumulative Impacts associated with continuance of prior authorizations**

Cumulative impacts result from the incremental impact of human activity when added to other past, present, and reasonably foreseeable future human activity. They can result from individually minor but collectively significant actions taking place over a period of time.<sup>3</sup> (40 CFR § 1508.7)

The Tract, a wilderness-like urban natural recreation area, is under pressure from many directions. Housing developments press against the western boundary of Tract and closely follow the southern boundary of the city's adjacent Far North Bicentennial Park. Numerous social trails can be followed onto Tract from these neighborhoods. The population of Anchorage is growing exponentially and the Municipality has established a new sports park consisting of ball fields and a 200 vehicle parking lot adjacent to the southeast corner of the Tract. A major developed trailhead also departs from this new parking lot, leading onto Tract from the south. The opening of Elmore Road (formerly the Abbott Loop Extension) will result in many more thousands of vehicles passing by the entrance of the Campbell Tract Facility on a daily basis, drawing more attention to the site by individuals who may not have been familiar with the site. These combined factors of growing population, neighbor encroachment, ball park access and changing traffic patterns will all result in significant increases in visitation to Tract. Independent of the opening of Elmore Road and ball park influences, the Tract's visitation has grown from 55,000 visits in 2002 to 95,000 visits in 2007.

In addition, recreation technology is changing rapidly, drawing more participants out onto the trails and into the woods on the Tract. Snowshoeing and skate skiing are becoming increasingly accessible and popular with local families and individuals. Mountain biking on summer trails has increased dramatically over the past five years, and winter mountain bikers, sporting specialized wide-tire snow-capable rigs, are rapidly encroaching on traditional ski trails. The rapidly growing sport of Geocaching is also drawing many new recreationists off the trails and into the trackless areas of the Tract.

These influences and other factors will lead to increased use and recreation pressure on area park lands including the Tract. Increased trail wear, forest impacts, and wildlife disturbance are obvious outcomes of heavier use. User experience and perception of solitude will be degraded by these increases, and by the increased noise associated with Elmore Road vehicle traffic and ball field activities.

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<sup>3</sup> 40 CFR § 1508.7

Learn To Return's activities on the Tract, at their present levels and designated locations, result in minimal impact to the land and user experience. An increase in class size, or greater emphasis on weekend instead of weekday programs, could result in higher levels of impact on other Tract users' experiences.

**4.1.3. Mitigation Measures for continuance of prior authorizations**

The following mitigation measures are recommended and are either in addition to or an enhancement of the mitigation measures contained in the proposed action:

1. Locate training sites in areas where cultural resources are not present. Increase instructor awareness of the value and types of cultural resources found on the Tract. Require formal briefing for all training participants on prohibitions of collecting, disturbing or destroying cultural resources. Prohibit digging of "cat-holes" and require removal of human waste from the site.
2. Include a stipulation requiring instructors and students to inspect and clean boots before entering the Tract. Require under-carriage washing of vehicles delivering materials to the permanent training sites. Utilize native spruce materials for all shelter and fire building activities and inspect for disease and contaminants before bringing on the Tract.
3. Locate training sites away from heavily used multi-use trails to reduce impact on other users' recreational experiences. Locate training sites in areas that allow maximum screening of noise and visual impacts from public trails and commonly used Tract recreational locations. Trails to training sites will not be improved or enlarged to discourage other users from inadvertently encountering sites. Post signs at designated Learn To Return training sites that identify the sites as BLM permitted activity sites. Reinforce general public prohibitions on camping and fire building on the Tract through signage.
4. Designated training sites have been established on the Tract since the early 1990's and their use is rotated seasonally. Locate training sites and activity areas away from sensitive habitat areas including stream banks and areas of unique vegetation. Instruct participants on Leave No Trace practices and prohibition on stripping trees and cutting live vegetation during field briefing. Regularly monitor impacts to trees and ground vegetation adjacent to training sites for signs of damage.
5. Activities should be scheduled when wildlife will be least impacted. Class size will be limited to 25 individuals with a maximum of 25 classes annually. Required student briefing will include information stating that all species of wildlife on the Tract are protected. Instructors will be responsible for insuring that all student participants exhibit Leave No Trace practices and minimize

impacts on all Tract resources. Instructors will adhere to the Tract's Wildlife Response Policy, will be trained in safe behavior when moose and bear are encountered, and will carry defensive pepper spray on all training sessions between May 1 and October 31. Classes will be relocated off-site or rescheduled during periods of dangerous wildlife postings of incidents within 1/2 mile of the Learn To Return training sites. (Anchorage Bear Committee "red signs"). Special instruction will be given to participants regarding the dangers of bear encounters. Harassment of wildlife is prohibited.

6. Student demonstration fires will be extinguished immediately after ignition. One small group warming fire is permitted on the established concrete fire pad during snow-season overnight classes. All Learn To Return classes will include the personnel and the means for immediate extinguishment.

**4.2. Impacts of Alternative B: No action alternative – discontinuance of prior authorizations.**

**4.2.1. Critical Elements of the Human Environment**

**4.2.1.1. Invasive, non-native species**

Discontinuance of Learn To Return's prior authorizations would eliminate the risk of introducing invasive, non-native species onto the Tract as a consequence of Learn To Return's importation of plant material.

**4.2.2. Non-Critical Elements of the Human Environment**

**4.2.2.1. Competing Use**

Discontinuance of Learn To Return's prior authorizations would pose an insubstantial reduction in user conflicts as the Learn To Return contingency of users is approximately 625 individuals and the Tract is presently receiving up to 95,000 visits per year.

**4.2.2.2. Vegetation**

Discontinuance of Learn To Return's prior authorizations would pose an insubstantial reduction in vegetation damage as the Learn To Return contingency of users is approximately 625 individuals and the Tract is presently receiving up to 95,000 visits per year.

**4.2.2.3. Wildfire**

Discontinuance of Learn To Return's prior authorizations would eliminate the risk of wildfire associated with the authorized use of fire on the Tract.

**4.2.2.4. Wildlife**

Discontinuance of Learn To Return's prior authorizations would pose an insubstantial reduction in risks to wildlife as the Learn To Return contingency of users is approximately 625 individuals and the Tract is presently receiving up to 95,000 visits per year.

**4.2.3. Cumulative Impacts of Alternative B: No action alternative – discontinuance of prior authorizations.**

Discontinuance of Learn To Return's prior authorizations would have an insubstantial cumulative impact on the environment as the Learn To Return contingency of users is approximately 625 individuals, the Tract is presently receiving up to 95,000 visits per year, and visits to the Tract are growing as is evidenced by the 40,000 visitor increase between 2002 and 2007.

**5.0 CONSULTATION AND COORDINATION**

**5.0.1. Consultation**

Brian Horner-Learn To Return  
Jeff Brune- Campbell Creek Science Center

**5.0.2. List of Preparers**

The following BLM specialists participated in the preparation of this analysis:

Donna Redding	Cultural Resources
Laurie Thorpe	Vegetation, Invasive/Non-Native Species
Geoff Beyersdorf	Subsistence
Doug Ballou	Recreation/Visitor Services, Visual Resources
Larry Beck	Waste, Hazardous/Solid
Bruce Seppi	Wetlands/Riparian Zones, Threatened or Endangered Species, Subsistence, Wildlife