

Appendix E -- Craig Community Use Area

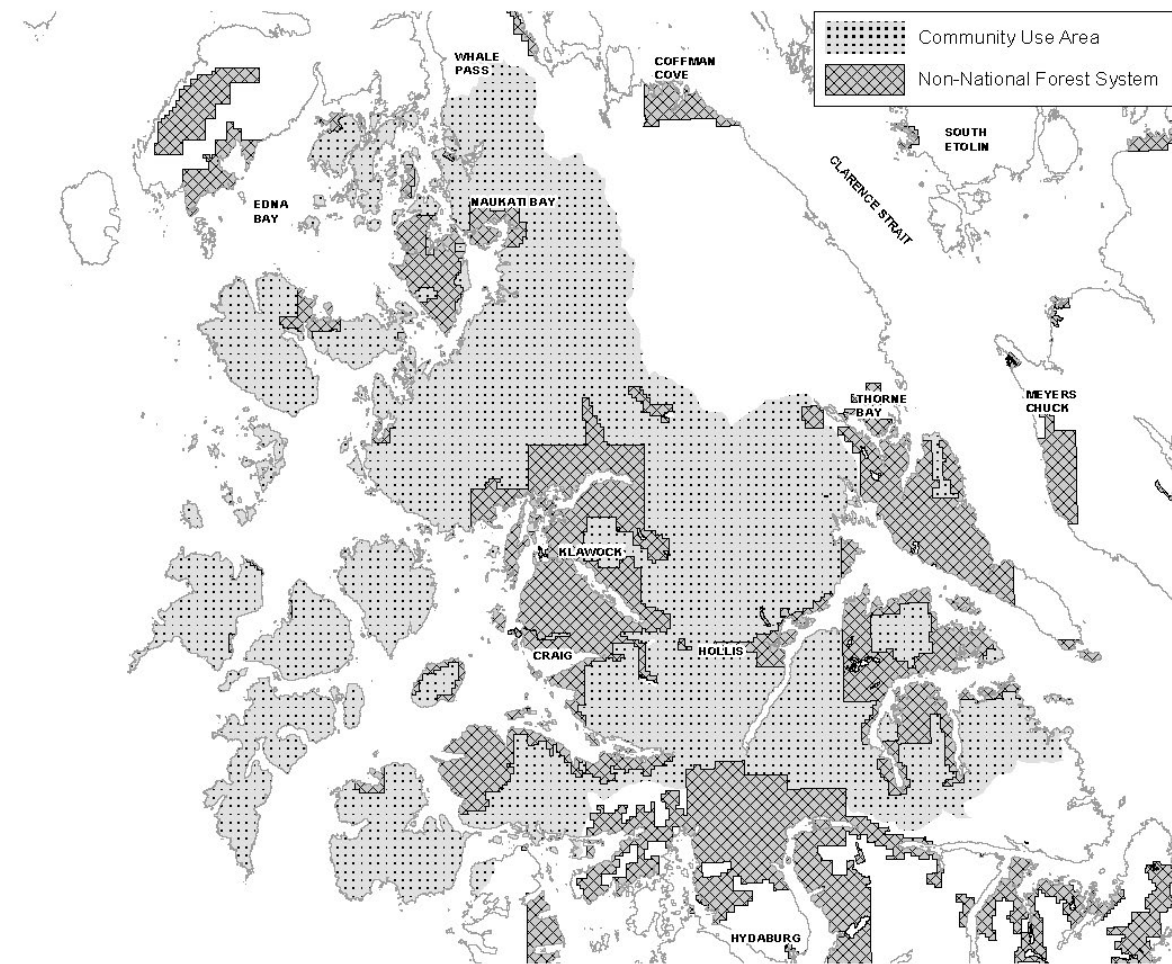
Appendix E

Craig (Shaan da)

Community Use Area

Craig's CUA encompasses a total of 733,670 acres (Figure E-3). Over half of this area (57 percent) is presently managed as roadless (Table E-11). This share would drop to 33 percent under Alternatives 3 and 5, with no acres managed as roadless under Alternative 6. The removal of LUD II acres under Alternative 3 accounts for approximately 55 percent of the decrease in roadless acres under this alternative. These areas would retain their congressional protections and continue to be managed in a roadless state. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 12 percent of the ARA in the Craig CUA. Areas allocated to Roadless Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Figure E-3
Craig's Community Use Area



**Table E-11
Roadless Areas, ARA Management Categories, and Development Opportunity in
Craig's Community Use Area**

Roadless Category (acres)	Alternative					
	1	2	3	4	5	6
Total Community Use Area:	733,670	733,670	733,670	733,670	733,670	733,670
Total Roadless Area	418,413	396,858	239,678	330,167	240,160	0
Roadless Share	57%	54%	33%	45%	33%	0%
ARA Management Categories (acres)						
LUD II Priority	na	99,731	0	99,731	98,201	0
Watershed Priority	na	132,064	29,012	0	0	0
Roadless Priority	na	165,063	80,188	192,343	141,960	0
Community Priority	na	0	29,012	0	0	0
Timber Priority	na	0	0	38,093	0	0
Development Opportunity						
Development LUDs (acres)	204,185	225,706	276,493	280,712	375,588	381,527
Timber Opportunity (Acres Suitable for Harvest)						
Old-Growth	40,738	46,824	60,255	64,177	65,495	65,495
Young-Growth	72,268	75,911	76,953	76,940	76,995	77,119
Estimated Harvest over 100 Years (acres)						
Old-Growth	9,263	9,435	9,613	8,691	8,712	7,043
Young-Growth	61,531	62,519	62,701	62,665	62,388	61,922
na = not applicable						

Not all acres removed from roadless management would be available for development. The change in acres in development LUDs serves as a measure of development potential as it presently exists by alternative. Approximately 28 percent (204,200 acres) of the Craig CUA is presently managed in development LUDs. This total would increase under all action alternatives, with net gains ranging from about 21,500 acres (Alternative 2) to 177,350 acres (Alternative 6).

Suitable old-growth and young-growth acres available for harvest would increase under all action alternatives. Estimated net gains in suitable old growth range from about 6,100 acres (Alternative 2) to 24,800 acres (Alternatives 5 and 6). Increases in suitable young-growth acres range from about 3,650 acres (Alternative 2) to 4,850 acres (Alternative 6).

Total acres harvested are assumed to remain constant across all alternatives. Estimated old-growth harvest over 100 years ranges from about 7,050 acres (Alternative 6) to 9,600 acres (Alternative 3). Estimated young-growth harvest ranges from about 61,500 acres (Alternative 1) to 62,700 acres (Alternatives 3 and 4), with an increase in potential young-growth harvest relative to Alternative 1 in all cases (Table E-11).

Subsistence

No significant effect on salmon, other finfish, or invertebrate habitat capability is expected from implementation of any alternative. These resources account for 70 percent of the total edible pounds of subsistence resources harvested by Craig households (Kruse and Frazier 1988). Marine resources (fish and marine invertebrates) accounted for 67 percent of per capita subsistence harvest in Craig in 1997 (ADF&G 2018).

The 1988 TRUCS study found that deer accounted for 22 percent of the total edible pounds of subsistence resources harvested by Craig households (Kruse and Frazier 1988). Deer accounted for 19 percent of per capita subsistence harvest by Craig residents in 1997 (ADF&G 2018).

Deer harvest by Craig residents is spread over many WAAs, but a majority (55 percent) are harvested from six WAAs in central and northern Prince of Wales Island (the top six WAAs in Table E-12). The Craig portion of the harvest in these six WAAs represents about one-third of the total harvest and about one-half of the rural hunter harvest (Table E-12). About 32 percent of the combined harvest in these WAAs is by non-rural hunters, indicating that there is a harvest buffer that could be restricted, if necessary, before restrictions are placed on rural harvests.

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The majority of the WAAs used heavily by Craig residents are in areas with substantial past timber harvest, and deer habitat capabilities are currently estimated to be below 1954 levels (Table E-12). The 2016 Forest Plan Amendment EIS analysis found that additional harvest under the current Forest Plan could further reduce estimated habitat capabilities by 1 to 7 percent after 100 years, except for two WAAs where there would be no effect (0902 and 1107) (Table E-12).

Table E-12
Deer Harvest and Deer Habitat Capability on NFS Lands for the WAAs where Craig Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest¹

WAA	Average Deer Harvest from 2004 to 2013			Deer Habitat Capability ³		
	Craig Residents	All Rural Hunters ²	All Hunters	2014	After 100 Years of Implementation	Change
1422	106	247	383	57%	50%	-7%
1318	70	159	198	90%	84%	-6%
1214	60	120	235	77%	71%	-6%
1332	56	67	76	88%	87%	-1%
0902	55	65	82	100%	100%	0%
1317	51	93	133	58%	56%	-2%
0901	43	56	66	95%	93%	-2%
1319	40	169	226	74%	69%	-5%
1107	30	99	130	99%	99%	0%
1315	29	201	317	56%	50%	-6%

¹ Calculated based on harvest where location is known.

² The category "All Rural Hunters" includes residents of Southeast Alaska communities, excluding the cities of Juneau and Ketchikan.

³ Deer habitat capability in 2014 and after 100 Years of full implementation is expressed as a percent of the 1954 habitat capability. Data presented for 100 Years of Implementation are estimates developed for the current Forest Plan in the 2016 Forest Plan Amendment EIS (USDA Forest Service 2016).

The 2016 Forest Plan Amendment EIS analysis found that use of most subsistence resources by Craig residents (fish and marine invertebrates) was not expected to be affected by any of the alternatives. Based on the Deer Availability and Anticipated Demand analysis completed for the 1997 Forest Plan Revision EIS, the 2016 analysis found that subsistence use of deer may be affected to the point that some restriction in hunting might be necessary over the long term, especially for non-rural hunters. The risk of hunting restrictions would be reduced somewhat, through more intensive management (e.g., thinning) of the existing and future closed-canopy, young-growth forests in this area. Indirect effects associated with increased competition for deer within Craig's subsistence use areas could also occur if hunters from other communities were displaced due to timber harvest activity.

Suitable old-growth acres would increase relative to Alternative 1 under most of the action alternatives, with larger increases under Alternatives 5 and 6 (Table E-13). In five of the WAAs, projected old-growth harvest is mostly expected to decrease relative to Alternative 1 under all five action alternatives, with projected harvest mostly expected to increase in the other five WAAs (Table E-14). These relative changes in projected harvest are small in absolute terms (i.e., number of acres), and none of the alternatives are expected to affect the findings of the 2016 Forest Plan Amendment.

Table E-13

Suitable Old-Growth by WAA and Alternative for the WAAs where Craig Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

WAA	Total Acres	Alt 1	Change from Alternative 1 (Acres)				
			Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
1422	120,282	10,120	350	3,770	3,900	3,900	3,900
1318	53,715	1,300	140	1,310	1,410	1,410	1,410
1214	61,675	3,440	1,910	3,190	3,190	3,190	3,190
1332	58,173	1,230	140	550	540	550	550
0902	105,924	-	-	-	-	10	10
1317	57,222	2,460	730	2,190	2,510	3,380	3,380
0901	36,528	490	(10)	(10)	1,270	1,270	1,270
1319	103,213	3,250	170	570	600	600	600
1107	124,051	360	10	80	80	90	90
1315	55,043	3,820	230	1,240	1,240	1,240	1,240

Table E-14

Projected Old-Growth Timber Harvest over 100 Years by WAA and Alternative for the WAAs where Craig Residents Obtain Approximately 75 Percent of their Average Annual Deer Harvest

WAA	Total Acres	Alt 1	Change from Alternative 1 (Acres)				
			Alt 2	Alt 3	Alt 4	Alt 5	Alt 6
1422	120,282	3,020	(180)	20	(360)	(410)	(410)
1318	53,715	390	-	180	120	110	110
1214	61,675	1,030	420	420	230	200	200
1332	58,173	370	-	20	(30)	(40)	(40)
0902	105,924	-	-	-	-	-	-
1317	57,222	730	130	290	210	360	360
0901	36,528	140	(10)	(30)	190	190	190
1319	103,213	970	(40)	(130)	(240)	(250)	(250)
1107	124,051	110	(10)	(10)	(30)	(30)	(30)
1315	55,043	1,140	(40)	(30)	(180)	(200)	(200)

Edna Bay

Community Use Area

Edna Bay's CUA encompasses a total of 633,338 acres (Figure E-4). Slightly more than half of this area (55 percent) is presently managed as roadless (Table E-15). This share would drop to 28 percent under Alternative 3 and 37 percent under Alternative 5, with no acres managed as roadless under Alternative 6. The removal of LUD II acres under Alternative 3 accounts for approximately 84 percent of the decrease in roadless acres under this alternative. These areas would retain their congressional protections and continue to be managed in a roadless state. Alternative 4 includes ARA acres that would be managed as Timber Priority and allow timber harvest and road building. Timber Priority acres account for 14 percent of the ARA in the Edna Bay CUA. Areas allocated to Roadless Priority would explicitly allow the cutting, utilization, customary trade, and removal of trees for the purposes of Alaska Native customary and traditional uses, as well as road construction deemed necessary by a federally recognized Tribe for access to Alaska Native cultural sites. This type of use would also be allowed in Timber Priority areas, which allow all timber harvest and road construction.

Table ES-2

**Table ES-2
Roadless Areas by Alternative and Management Designation**

Roadless Designation (acres)	Alternative					
	1	2	3	4	5	6
	No Action	Roaded Roadless	Logical Extension	Partial Dev. LUDs ¹	All Dev. LUDs	Full Exemption
Total Roadless Area	9,368,000	9,336,000	8,224,000	8,975,000	7,047,000	0
ARA Management Designations						
LUD II Priority	N/A	854,000	0	854,000	847,000	0
Watershed Priority	N/A	3,284,000	3,259,000	0	0	0
Roadless Priority	N/A	5,199,000	4,595,000	7,363,000	6,200,000	0
Community Priority	N/A	0	370,000	0	0	0
Timber Priority	N/A	0	0	757,000	0	0
Change in Roadless Area Acres						
Roadless Area Removed	0	142,000	1,252,000	401,000	2,321,000	9,368,000
Roadless Area Added	0	110,000	107,000	7,000	0	0
Net Change	0	-32,000	-1,144,000	-394,000	-2,321,000	-9,368,000
Old-Growth Acres Suitable for Timber Production						
Total Acres	227,000	247,000	312,000	388,000	395,000	395,000
Net Change	0	20,000	85,000	161,000	168,000	168,000
T77 & TNC/ Audubon Conservation Priority Areas Outside of Roadless given Long-term Regulatory Protection						
Total Acres	0	0	507,000	0	0	0

¹ Includes Timber Production and Modified Landscape LUDs, but not Scenic Viewshed.

N/A = not applicable

Note: Numbers may not appear to sum correctly due to rounding.

Litigation Filings

List of Plaintiffs Litigating Against the ARA Rule

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Attorneys for Plaintiffs Organized Village of Kake, et al.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

ORGANIZED VILLAGE OF KAKE; ORGANIZED VILLAGE OF)
SAXMAN; HOONAH INDIAN ASSOCIATION; KETCHIKAN)
INDIAN COMMUNITY; KLAWOCK COOPERATIVE)
ASSOCIATION; WOMEN’S EARTH AND CLIMATE ACTION) Case No. 1:20-cv-
NETWORK; THE BOAT COMPANY; UNCRUISE; ALASKA) _____
LONGLINE FISHERMEN’S ASSOCIATION; SOUTHEAST)
ALASKA CONSERVATION COUNCIL; NATURAL RESOURCES)
DEFENSE COUNCIL; ALASKA RAINFOREST DEFENDERS;)
ALASKA WILDERNESS LEAGUE; SIERRA CLUB; DEFENDERS)
OF WILDLIFE; NATIONAL AUDUBON SOCIETY; CENTER FOR)
BIOLOGICAL DIVERSITY; FRIENDS OF THE EARTH; THE)
WILDERNESS SOCIETY; GREENPEACE, INC.; NATIONAL)
WILDLIFE FEDERATION; and ENVIRONMENT AMERICA,)
)
Plaintiffs,)
v.)
)
SONNY PERDUE, in his official capacity as Secretary of)
Agriculture, UNITED STATES DEPARTMENT OF)
AGRICULTURE, STEPHEN CENSKY, or his successor, in his)
official capacity as Deputy Secretary of Agriculture; and UNITED)
STATES FOREST SERVICE,)
)
Defendants.)

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF
(5 U.S.C. §§ 701-706; 16 U.S.C. § 551; 16 U.S.C. § 1608; 42 U.S.C. § 4332; 16 U.S.C. § 3120)

Litigation Filings

List of Past Intervenors Asked to Support the ARA Rule

