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First name: David

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Organization:

Title:

Comments:

I have lived in Alaska since 1977 the same year I began working for the Forest Service on the Tongass National Forest. Although I still work for the Forest Service. my comments to Roadless is as a private individual, not a Forest Service employee. My wife and I have been residents of Wrangell Alaska since 1980.

Recognizing the hierarchy of laws, rules and policy from the Tongass Forest Land and Resource Management Plan, the environmental analysis for the Alaska Roadless Rule is seriously flawed. The current Tongass Forest Plan is consistent with the current Roadless Rule for Alaska. Should the Roadless Rule for Alaska change the Tongass Forest Plan would need to change to be consistent with any new Roadless Rule. The analysis fails to recognize that fact in its predictions for the environmental impacts of the alternatives. The Forest Plan would no longer protect areas as it would be changed through non-significant plan amendments or the next time the Forest Plan is amended or reissued. The current protections in the Forest Plan would be removed for the Plan to be consistent with any new Roadless Rule. The analysis needs to be done over.

I do not prefer the no action alternative because it fails to deal with management of the roads that were built within the 2001 inventory roadless areas at a time courts had suspended the roadless rule or while managers were using the different year's inventory.

David Rak

[POSITION]