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Comments: I am writing to urge the Department to reject the proposal to remove the Tongass National Forest from protection under the National Roadless Rule, and to instead adopt the "no-action" alternative (Alternative 1) in the DEIS and protect the Tongass National Forest.

The Department's preferred option of Alternative 6, the complete removal of protections under the Roadless Rule, will be detrimental to the economic, cultural, and ecological health of communities throughout Southeast Alaska. Furthermore, this alternative is not supported by the vast majority of Americans, who, after all, are the people who that the Department is supposed to be the the steward of "public lands" for.

As someone from the Lower 48 who has had the opportunity to travel to Alaska and hike in the Tongass National Forest, I am have personally experienced the benefits that come from having forests that have been protected from logging and roadbuilding in ways that few lands in the rest of the country are protected. I urge the Department to continue to protect the Tongass so that future generations of Americans can also experience this unique national asset.

Furthermore, as a law professor who teaches and researches about land use and environmental law, I know that the Roadless Rule is among the most economically rational land management policies the Federal Government has adopted. Not only does it preserve that pristine habitat, but it also saves untold millions of taxpayer dollars that might otherwise be spent to subsidize money-losing timber sales. The value of the Roadless Rule in preventing environmentally damaging and economically wasteful road-building and logging is particularly relevant in the Tongass, where logging costs vastly exceed timber revenues and require unsustainable taxpayer subsidies.

Furthermore, the 2001 National Roadless Rule is well designed and flexible enough to allow for access and development projects that benefit local communities. Since 2009 48 projects have been approved in the Tongass, the majority relating to surface exploration of potential mining and hydropower. The USFS has also taken steps to expedite this approval process, now taking only one to three weeks for the Tongass National Forest.

A straightforward cost-benefit analysis clearly indicates that the myriad of benefits - to local economies, ecosystem health, and the national heritage of protected lands - of maintaining the Roadless Rule for the Tongass far outweigh the supposed "benefits" that lifting the rule would have, in the form of a windfall subsidy to logging, an industry that is no longer competitive nor sustainable. The DESI had five alternatives to its preferred Alternative 6 of removing protection to the Tongass, all of which would ensure greater protection for the intact old-growth temperate rainforests of the Tongass National Forest, and its value in providing recreation opportunities, clean water, and fish and wildlife habitat, which contribute to. I therefore urge the Department to

select the "no-action" alternative, or at the very least re-consider the other four alternatives to Alternative 6, on the Alaska-specific Roadless Rule and keep the 2001 National Roadless Rule on the Tongass.

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