

roads and trails. It is a pleasure to be out in that great part of the country.

Mr. NELSON. Thank you. It is always a pleasure to appear before the committee.

(The following was received for the record:)

ADDITIONAL COMMENTS BY M. M. NELSON, DEPUTY CHIEF, U.S. DEPARTMENT OF AGRICULTURE, FOREST SERVICE, AS REQUESTED BY THE CHAIRMAN, SUBCOMMITTEE ON ROADS, COMMITTEE ON PUBLIC WORKS

ROAD IN RELATION TO COMPETITION FOR NATIONAL FOREST TIMBER

The Forest Service is just completing a comprehensive study of timber sales in the Pacific Northwest to determine the facts of why we get increased bidding, and thus higher returns to the government, on some sales and not on others. The study concludes that a key factor to increase the competitive position of our timber sales would be to increase the level of road construction by appropriated funds. Studies made earlier by others also indicated this need of roads to engender full competition for timber.

ADEQUACY OF HIGHWAY ENGINEERING ON NATIONAL FOREST SYSTEM ROADS

One industry witness expressed alarm concerning uniform grade, alignment, balanced cuts and fills and *excessively detailed surveys*. We are very much concerned with the most efficient use of available road dollars. We are also concerned with the road system providing functional, *safe* service at the lowest cost. These objectives must be met in keeping with the conservation and the enhancement of the Forest environment. In order to require that roads be built to meet these criteria, the roads must be adequately defined in plans and specifications. Specified roads (roads which are to become permanent Forest Development Roads) needed in the timber sale must be built to the required standards. We believe we must precisely prescribe the required construction or we are unfair to the timber purchaser who has to know what he has obligated himself to perform when he bids. We know of no way to accomplish this objective without definitive plans and specifications. "Flexible" requirements can only create uncertainty on the part of both parties to the timber sale contract.

RELATIONSHIP OF ROAD CONSTRUCTION PRACTICES ON PRIVATE LAND U.S. ROADS CONSTRUCTION BY TIMBER PURCHASERS ON GOVERNMENT LAND

We do not believe that the practices followed by private timber land owners in logging private lands for maximum profit are acceptable guides for management of the National Forests.

A prudent manager of public lands must have different standards than would a prudent manager of private lands. We cannot, by our timber management practices, "lock out" other legitimate users of the National Forests, nor can we unnecessarily detract from or fail to protect resource values such as aesthetics, soil and water.

We do not know, nor have we been able to determine, how the actual cost of building private roads on private lands compares with the cost of National Forest roads. Our cost records are available for public scrutiny. We are proud of the many economies we have been able to incorporate into design and construction techniques. Private road costs on the other hand are generally unavailable. Sometimes tax benefits make it more "profitable" to have costs appear as operating or maintenance expenses instead of amortization of construction cost. Also, we never know what elements are included as costs for the private land road, and whether or not they are the same elements that appear in National Forest timber sale appraisal data. For example, does the private land cost figure include identifiable allowances for executive overhead, equipment depreciation or right-of-way clearing? If we had access to accounts of such costs and could verify them, we would be glad to use them in timber sale appraisals for estimating costs when similar roads are appropriate on sale areas. For these reasons the comparability of "investments" made in the public roads and private roads as well as a comparability of the "prudence" of these investments is difficult and usually impractical to make. We have been the target of many such comparisons in the past, and we do not consider them to be fair.