



November 10, 2004

Content Analysis Team
ATTN: Roadless State Petitions
USDA Forest Service
P.O. Box 221090
Salt Lake City, UT 84122

To Whom It May Concern:

Taxpayers for Common Sense (TCS), a nonpartisan budget watchdog, submits this letter as our official public comment regarding the roadless area management state petition proposal [Docket number: 04-16191]. TCS opposes changing the Roadless Rule because doing so will result in higher taxpayer subsidies for the timber industry.

The Forest Service's road building and timber extraction programs cost federal taxpayers millions each year in subsidies. Even worse, inadequate record keeping makes it nearly impossible to understand how the Forest Service spends the billions of dollars it receives each year from federal taxpayers. The new rule, if implemented, would expand by nearly 60 million acres the forest land available for timbering and road building, thereby increasing federal taxpayer costs without fixing the Forest Service's significant management problems.

Maintaining current roadless areas shields taxpayers from subsidizing the cost of building new roads to access federal timber, and again from selling that timber at below-market value to private timber companies. The Government Accountability Office (GAO), the investigative arm of Congress, has conducted numerous studies regarding the taxpayer cost of road building and timbering on federal forest lands. The GAO estimates that these programs cost taxpayers greater than \$2 billion in only six years (1992-1997).

Building more forest roads is all the more wasteful because our national forests are already overwhelmed with roads, making subsidies for future road building a poor taxpayer investment. Some 430,000 miles of roads crisscross our national forests. That is like putting twice the mileage of roads as are in our national highway system into an area the size of Texas. There is not enough money to service this massive forest road system, resulting in a maintenance and capital improvement backlog of more than \$10 billion.

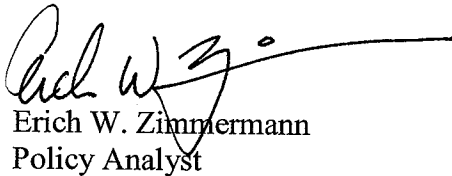
Finally, TCS is greatly concerned by the documented lack of Forest Service accountability. In 2003, for example, the GAO concluded that the Forest Service was unable to adequately account for how it spent the \$5 billion it received in taxpayer

dollars. This was only the most recent example of the GAO's admonishment of Forest Service budget and oversight practices. These long-standing problems need to be adequately addressed before the Forest Service is given authority to build roads on the millions of acres covered by the Roadless Rule.

The nation's budget deficit—which last year topped \$400 billion—can no longer be ignored. We must reign in spending, and a logical first step is to eliminate unnecessary and wasteful expenditures, not expand them. Federal taxpayers can not afford to subsidize road building and sell trees below-market, and expanding the amount of land on which this can occur is irresponsible. Prohibiting roads effectively minimizes the burden on taxpayers, and the Roadless Rule should therefore be kept in place. We are pleased to note that more than 100 prominent economists from around the nation concur with this conclusion (their letter is attached).

TCS requests that you keep the best interest of taxpayers in mind and leave the Roadless Rule in place. If you have any questions regarding our position, please contact me at (202) 546-8500 X132 or erich@taxpayer.net.

Best regards,



Erich W. Zimmermann
Policy Analyst

Enclosure