FSEEE Forest Service Employees for Environmental Ethics
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September 29, 2026

Via email to: SM.FS.InfoQuality@usda.gov
Forest Service Data Quality Official (FS-DQO)
cc: Joshua White, Acting Director, Ecosystem Management Coordination
USDA Forest Service

Re: Request for Correction of Information — *Proposed Rule: Special Areas; Roadless Area Conservation; National Forest System Lands, Cost Benefit Analysis and Consideration of Impacts on Small Entities* (2026) (Docket No. FS-2025-0001; RIN 0596-AD66)

Dear Data Quality Official:

Forest Service Employees for Environmental Ethics (FSEEE) submits this **Request for Correction of Information under the Forest Service Information Quality Guidelines**, the USDA Information Quality Guidelines, and the Information Quality Act, Pub. L. No. 106-554, § 515 (44 U.S.C. § 3516 note).

1. Requestor

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2. Information to be corrected

USDA Forest Service, *Proposed Rule: Special Areas; Roadless Area Conservation; National Forest System Lands — Cost Benefit Analysis and Consideration of Impacts on Small Entities* (the Analysis), disseminated in August 2026 with the proposed rule to rescind the 2001 Roadless Area Conservation Rule, 91 Fed. Reg. 53,827 (Aug. 20, 2026), and the accompanying Draft Environmental Impact Statement, in Docket No. FS-2025-0001.

This request is submitted during the public comment period, which closes October 6, 2026, as USDA's procedures require for information disseminated in a rulemaking.

3. Errors and requested corrections

(a) The minimum annual cost omits a cost the Analysis itself calls a minimum. Table 4 (at 30) reports minimum annual costs of −$5.3 million. Footnote 6 to that table states that costs "include forgone recreation benefits (minimum of $6.1 million annually) and forgone passive use values ($5.3 to $11.5 million annually)." The maximum column sums both components ($6.1 million + $11.5 million = $17.6 million). The minimum column does not; it reports only the low end of forgone passive use values. Table 1 (at 5) repeats the error, listing lost recreation benefits of −$6.1 million and forgone passive use values of −$5.3 to −$11.5 million, then totaling them as "−$5.3 to

−$17.6 million."
Requested correction: If, as footnote 6 states, $6.1 million is the minimum recreation cost, report minimum annual costs of −$11.4 million in Tables 1 and 4.

(b) The recreation cost is described inconsistently. The Analysis derives the $6.1 million figure by "[a]ssuming an upper limit of a 1 percent annual loss of economic benefit" (at 26). Footnote 6 to Table 4 describes the same figure as a "minimum." It cannot be both.
Requested correction: Characterize the figure consistently, and if it is an upper limit, supply the corresponding lower bound and carry both into the cost range.

(c) The upper-bound net present values omit the recreation cost. The Analysis reports net present values of "−$92 to $199 million" at 3 percent and "−$70 to $152 million" at 7 percent (at 29). Footnote 5 explains that the upper bound sums "the high estimate of timber benefits to society and low estimate of forgone passive use value," while only the lower bound includes "forgone recreation benefits" (at 29 n.5). The upper bound therefore excludes a cost footnote 6 describes as a minimum.
Requested correction: Recompute the upper-bound net present values with the $6.1 million recreation cost included. On FSEEE's calculation, using the Analysis's own discounting, the upper bound falls from $199 million to about $126 million at 3 percent, and from $152 million to about $97 million at 7 percent. The minimum column of Table 4 ($9.9 million benefit against $11.4 million cost) becomes net negative on an annual basis.

(d) Small-entity receipts are reported in two figures that differ by three orders of magnitude. The text states that average receipts per sub-20 recreation firm were "$19,000 in 2022"; Table 6 on the same page reports $19.14 million (at 35).
Requested correction: Correct whichever figure is wrong, and re-examine the Regulatory Flexibility Act analysis that relies on it.

(e) Stumpage receipts are classified as a social benefit although the Analysis's own findings make them a transfer. The Analysis counts stumpage receipts within the "timber benefit to society," justifying this on the ground that stumpage revenue benefits "the public from payments to local governments and projects on NFS lands" (at 21–22). But it also finds that "changes in stumpage revenue under the proposed rule would not change SRS payments" (at 22), and that 1908 Act 25-percent payments "go to 63 out of 745 counties and those are mostly related to recreational ski resorts and not necessarily timber operations" (at 12). The Analysis already treats the recreation expenditure loss as a transfer.
Requested correction: Reclassify stumpage receipts as a transfer, or explain on the record how they produce a net social benefit given these findings.

Because these corrections would reduce the Analysis's best-case net benefit by more than a third, FSEEE has separately asked the Department, in its comments in this docket, to publish any corrected Analysis for public comment before issuing a final rule.

4. Why the information does not meet quality standards

The Forest Service and USDA guidelines require disseminated information to be accurate, reliable, and unbiased in substance and presentation. Errors (a) through (d) are errors on the face of the document: arithmetic, labeling, and transcription inconsistencies that can be confirmed without new data. Error (e) is a classification the Analysis's own text contradicts.

The Analysis is also "influential" information under USDA's guidelines. USDA treats information as influential in rulemaking when it "will have a clear and substantial impact on the resolution of one or more key issues in an economically significant rulemaking." USDA Information Quality Guidelines at 9 (2002). The Department has designated the rule "economically significant under E.O. 12866 section 3(f)(1)," 91 Fed. Reg. 53,827, 53,830 (Aug. 20, 2026); the Analysis states that the rule's impacts "could exceed $100 million" (at 5); and the Analysis is the only quantified support for the rescission's stated economic rationale. Influential information is subject to heightened standards of transparency and reproducibility, which a table that does not sum to its own footnote cannot meet.

5. How the errors affect FSEEE

FSEEE is a national conservation organization whose members include current and former Forest Service employees. It participates in this rulemaking and relies on the Analysis to evaluate and comment on whether the proposed rescission produces net benefits. As disseminated, the Analysis's best case shows a net benefit of $199 million (3 percent) and Table 4's minimum column shows a positive annual net benefit. Corrected, the best case is more than a third smaller and Table 4's minimum column is net negative. The errors misinform FSEEE, its members, and the public on the central economic question in the rulemaking, and they impair FSEEE's ability to comment meaningfully.

6. Relationship to FSEEE's comments

FSEEE's written comments in this docket identify the same errors (Section III.E) and ask that they be treated as a request for correction. This stand-alone request is submitted during the comment period, as USDA's procedures require. FSEEE understands that under those procedures the response to a request concerning rulemaking information will normally be provided in the final rule document, and asks that it address each item above.

Thank you for your attention to this request.

Respectfully submitted,

Kevin Hood
Executive Director
Forest Service Employees for Environmental Ethics

Enclosure: Excerpts from the Analysis — title page and pages 5, 12, 21–23, 26, 29–30, and 34–35 (attached).

ENCLOSURE

Excerpts from the Economic Analysis

Proposed Rule: Special Areas; Roadless Area Conservation; National Forest System Lands — Cost Benefit Analysis and Consideration of Impacts on Small Entities (USDA Forest Service, 2026)

Pages included: title page; 5, 12, 21–23, 26, 29–30, 34–35

Submitted with FSEEE's Request for Correction of Information (Sept. 29, 2026)
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Page	Relevant to
5	Table 1 totals; "could exceed $100 million" — items (a), (c); § 4
12	1908 Act payments to 63 of 745 counties — item (e)
21–23	Stumpage "payments to local governments"; SRS; delivered log value — item (e)
26	Recreation cost as "an upper limit" — item (b)
29	Net present values and footnote 5 — item (c)
30	Table 4 and footnote 6 ("minimum of $6.1 million") — items (a), (b)
34–35	Small-entity receipts, $19,000 vs. $19.14 million — item (d)

Forest Service
U.S. DEPARTMENT OF AGRICULTURE

USDA Forest Service, National Forest System, Washington Office

Proposed Rule: Special Areas; Roadless Area Conservation; National Forest System Lands

Cost Benefit Analysis and Consideration of Impacts on Small Entities

While the scope of quantified annual economic effects range between the amounts shown in Table 1, the additional impacts from the proposed rule could exceed $100 million. The cost benefit analysis discusses potential industry impacts in more detail for timber, recreation (including tourism), commercial fishing and seafood processing, minerals and energy, some of which may experience tradeoffs as a result of the proposed rule.

Table 1. Summary of quantifiable costs, benefits and transfers for current rule and proposed rule within IRAs

	Current Rule	Proposed Rule
Annual Forgone Benefits		
Lost recreation benefits	$0	-$6.1 million
Forgone passive use values	$0	-$5.3 to -$11.5 million
Annual Benefits		
Timber benefit to society	$0	$9.9 to $22.0 million
Annual Transfers		
Recreation expenditure loss		$9 million
Total annual forgone benefits	$0	-$5.3 to -$17.6 million
Annual benefits	$0	$9.9 to $22.0 million
Annual transfers	$0	$9 million

The proposed rule is expected to provide some opportunities for both large and small entities and is not expected to result in significant impacts to a substantial number of small entities, as defined by E.O. 13272 and SBREFA, and therefore no additional analysis is required for the proposed rule.

Introduction

The U.S. Department of Agriculture is proposing to rescind the 2001 Roadless Area Conservation Rule (2001 Roadless Rule) (66 FR 3244, 36 CFR Subpart B (2001)), which established broad prohibitions on road construction, road reconstruction, and timber harvesting within inventoried roadless areas on National Forest System lands. State-specific roadless rules for Idaho and Colorado at 36 CFR 294 Subparts C and D will not be affected by this proposed rule and will remain in effect. Rescinding the 2001 Roadless Rule is intended to reduce regulatory burden and return decision-making for the management of inventoried roadless areas to the land management planning process at the individual national forest level. This action is also being proposed in accordance with Executive Order 14153: *Unleashing Alaska's Extraordinary Resource Potential*, and would have the same result as reinstating the 2020 Alaska Roadless Rule (85 FR 68688) that exempted the Tongass National Forest from the 2001 Roadless Rule.[1]

[1] This analysis includes the Tongass National Forest and updates some information included in the 2020 Final Environmental Impact Statement for the 2020 Alaska Roadless Rule, and supporting analysis. It does not replace or supersede that information and provides distinct analysis for the regulatory process, as explained here.

distributed to eligible counties to help maintain essential services, such as local roads and schools. The Secure Rural Schools Act disburses revenue to counties by providing payments based on the three highest revenue-sharing payments from FY1986 to FY1999, the proportion of Forest Service lands in the county, and the county's per capita per income index. Therefore, timber revenue after FY 1999 does not impact the calculation of payments to states and counties from the Secure Rural Schools Act. The Secure Rural Schools payments are legislated by Congress and payments not covered by Forest Service revenues are covered through funding from Congress. The 1908 Act 25% payments[2] go to 63 out of 745 counties and those are mostly related to recreational ski resorts and not necessarily timber operations. Counties that do not elect 1908 payments receive Secure Rural Schools payments (USDA Forest Service 2026b).

Minerals and Energy

In 2023, energy and mineral production from NFS lands contributed more than $7.6 billion to the Nation's economic activity in terms of Gross Domestic Product and supported approximately 37,800 jobs (USDA Forest Service 2025a). Even where its share of total U.S. supplies is small, National Forest System production can be very important to local economies.

Locatable minerals, such as gold, silver, copper, and iron, may be located and removed from Federal lands open to location and entry under the authority of the Mining Law of 1872, as amended ("the mining laws"). The mining laws authorize citizens to enter Federal lands that are open to the operation of the mining laws, including NFS lands reserved from the public domain, to prospect, explore, and develop valuable minerals on lands, unless those lands have been withdrawn from entry and appropriation under the mining laws. The mining laws also provide for access suitable to conduct these activities. Depending on the stage of exploration or development, reasonable access can range from unimproved temporary roads for prospecting or drilling to more permanent improved roads for full mine development and transportation of ore. The Forest Service cannot prohibit reasonably necessary activities required for the exploration, prospecting, or development of valuable mineral deposits on NFS lands open to mineral entry, though the agency has the authority and the obligation to regulate locatable mineral operations in order to prevent or minimize damage to NFS surface resources.

The Forest Service receives approximately 198 plans of operations for locatable minerals each year; primarily from individual operators or small operations with no commercial output, but which may contribute to local economies. The Forest Service estimates that revenue generated in 2024 from 11 large mines on NFS lands totaled about $1.4 billion (USDA Forest Service 2025b).

Valuable deposits of locatable mineral resources may occur in inventoried roadless areas. The reasonable access to locatable minerals, including construction or reconstruction of roads where warranted, is a right of access provided by the General Mining Law. The Forest Service (with Bureau of Land Management) review and approve locatable mineral operations based on the mining laws and requirements in the regulations at 36 CFR Part 228, Subpart A.

The 2001 Roadless Rule provides that the responsible official may grant certain limited exceptions to the road construction prohibitions, including for reserved or outstanding rights, existing or renewed mineral leases (36 CFR 294.12(b) (2001)). Since 2018, agency records indicate Regional Foresters approved exceptions for road construction, reconstruction, or tree cutting related to at least 19 locatable operations within IRAs, the majority of which were for exploration operations. In addition, of the 11 large mines

[2] The 1908 Act directs 25% of gross revenues generated from U.S. Forest Service lands (for all resources, such as timber sales, mineral leases, grazing fees, and recreation fees) within a county to be shared with that county for the benefit of public schools and public roads.

how the forest plan's timber harvest goals can be better achieved, but does not alter the plan's underlying goals or projected outcomes. The proposed rule would not compel the amendment or revision of any land management plan. While the rulemaking would not require such changes, plans may be amended in any manner whatsoever and are revised periodically (16 U.S.C. 1604(f)). Local responsible officials (forest supervisors and regional foresters) would continue to have discretion to amend or revise a land management plan as deemed necessary.

Under the proposed rule, it is reasonably foreseeable that an increasing proportion of timber volume sold would come from within the potentially affected inventoried roadless areas. Timber harvest would potentially increase within the affected IRAs due to the removal of prohibitions; however, harvest could only occur where allowed by land management plans and agency policy and in areas where mechanized equipment can safely operate. Areas far from existing road networks, on steep slopes (greater than 70 percent), or that are not vegetated are less likely to present management opportunities due to decreased economic viability. However, where conditions are operable, and the current land management plans allow, timber harvest may occur. The exact locations and actual amounts of timber harvest depend on many factors, including individual forest plan direction and demand from the wood products industry. In the long term, land management plan amendments and revisions could increase the area where timber harvest would be allowed. The additional harvest volume may result in increases in revenue from timber harvest estimated below.

We estimated potential volume available for timber harvest based on operable areas in IRAs, average annual harvest rates, and volume of timber on NFS lands. Value of that potential volume was then estimated based on average stumpage rates (predicted high bid prices) for timber sold on NFS lands, characterized by FIA forest type. Forest Service stumpage rates (predicted high bid prices) were used because they reflect previous Forest Service timber sales (price per species) and are readily available in the Forest Service Timber Information Manager system. In addition, predicted high bid is a useful estimate of stumpage value plus all additional expenses from removal of timber; such as logging, hauling, and overhead, and often a profit margin for the logger or supplier. The stumpage values are potential revenue to the Forest Service that result in benefits to the public such as payments to local governments and projects on NFS lands. In addition, revenue to the timber industry is characterized by producer surplus (profit) estimated by subtracting predicted high bid for stumpage from the delivered log prices.[3] See Appendix A for more information on stumpage price methodology and assumptions.

Stumpage value is presented in broad ranges and is best interpreted at broad scales due to the limited statistical reliability of FIA data. Figure 2 shows potential estimated annual timber harvest values of merchantable sawtimber per year. Estimates are based on observed stumpage rates and current national forest harvest levels and apply forest plan constraints to better reflect current timber harvest opportunity. This only includes acres and volumes in likely operable or likely operable but complex categories within roadless areas that have current land management plan direction that generally allows forest management

[3] The stumpage rate and the delivered log price represent two different points in the timber value chain. The stumpage rate is the price paid to the landowner—such as the federal government—for the timber "on the stump" in the forest. It reflects only the value of the trees as they stand and does not include any costs for cutting, hauling, or transporting the logs. In contrast, the delivered log price is what a mill pays for logs delivered to its yard. This price includes the stumpage cost plus all additional expenses such as logging, hauling, and overhead, and often a profit margin for the logger or supplier. Because of these added costs, delivered log prices are typically higher than stumpage rates, depending on terrain, distance to mills, and species. Predicted high bid is used to estimate stumpage, since market values for the forest service are not available, and the process for estimating predicted high bid includes costs beyond just stumpage, such as cutting, hauling, or transporting the logs.

activities in these areas. It is not possible to fully predict annual harvest given local decision-making authority and local market conditions.

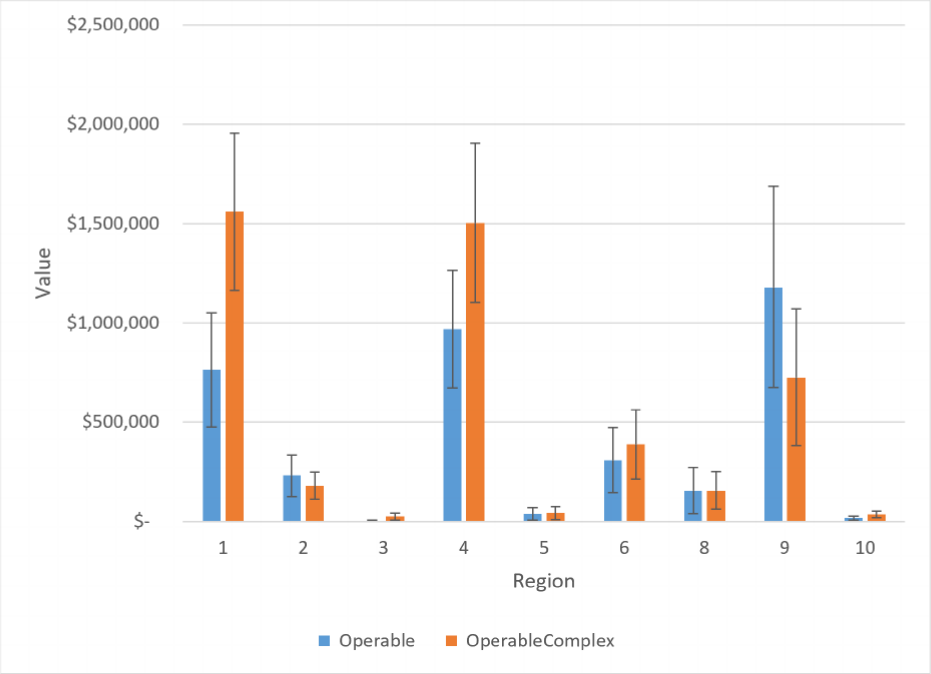

Figure 2. Potential Merchantable Sawtimber Harvest Value per year in operable inventoried roadless areas applying current land management plan direction

The proposed rule is estimated to potentially provide opportunity for an increase in annual timber harvest compared to the baseline condition, valued at $5.2 to $11.4 million per year in revenue for the Forest Service benefiting the public from payments to local governments and projects on NFS lands. These values are attributable to both anticipated harvest in likely operable areas valued at $2.2 to $5.2 million per year and an additional $3.1 to $6.2 million per year of harvest within the operable but complex areas (where not restricted by land management plans). If all potential harvest occurred, it could represent a 5 to 10 percent annual increase in total sawtimber harvest on National Forest System lands. In the long term, land management plan amendments and revisions could expand the area where timber harvest would be allowed as well as increase potential timber harvest volumes and revenue for the agency and, subsequently, the timber industry.

As detailed above in the Baseline Condition section, timber revenue does not impact the payments to states and counties from the Secure Rural Schools Act (and most counties with timber production elect for Secure Rural Schools payments) because the payments are calculated based on the three highest revenue-sharing payments from FY1986 to FY1999 (before SRS was enacted), proportion of Forest Service lands in the county, and the county's per capita per income index (USDA Forest Service 2026b). Thus, changes in stumpage revenue under the proposed rule would not change SRS payments because payments are calculated based on the period from FY1986 to FY1999.

The proposed rule provides flexibility for local land managers to tailor forest management, as appropriate to local land conditions and consistent with local land management plans. This potentially changes the composition of species available for industry to harvest. The timber industry could realize cost savings from lower hauling costs to get to the mill if roads are constructed in areas where they have been prohibited by the 2001 roadless rule. The proposed rule provides flexibility for timber managers for designing timber sales that appraise positively. Cost savings from improved flexibility could, in turn, potentially improve the Forest Service's ability to offer economically feasible sales that meet the needs of the industry.

Information on delivered log prices is used to calculate revenue to the timber industry. Delivered log prices account for profit and a variety of costs beyond stumpage value that include cutting, loading, hauling and delivering stumpage to mills. Using data on stumpage and delivered log prices (SilvaStat360 2026, Timber Mart South 2026, Timber Mart North 2026), we estimated regional ratios to obtain delivered log value from stumpage value that range from 1.73 to 2.37. Using these ratios, we estimate the revenue to industry to be the total delivered log value of $9.9 to $22 million annually. Subtracting stumpage value (estimated using predicted high bid prices) provides producer surplus since the process for estimating predicted high bid includes all costs beyond just stumpage, such as cutting, hauling, or transporting the logs. This difference between the stumpage value (estimated using predicted high bid) and delivered log value is $4.6 to $10.6 million annually. We request comment that would further facilitate producer surplus quantification.

We examined an alternative (see Alternative 3 social and economic impacts detailed in the Environmental Impact Statement) that would remove 2001 Roadless Rule prohibitions in areas that are within ½ mile of existing roads or within Wildland Urban Interface (WUI) to increase management flexibility, while retaining roadless rule prohibitions on timber harvest and road construction outside of those areas. Applying land management plan direction, national annual increases in stumpage value would be approximately $4.2 to 9.7 million per year (this is comparable to the agency effect of $5.2 to 11.4 million for the proposed rule) benefiting the public from payments to local governments and projects on NFS lands. If all of this harvest occurred, it could represent a potential 4 to 9 percent annual increase in total sawtimber harvest on National Forest System lands. In the long term, land management plan amendments and revisions could increase the area where timber harvest would be allowed as well as increase potential timber harvest levels and revenue for the timber industry.

Minerals and Energy

Exploration and development of any domestic mineral or energy resources is a function of fluctuating commodity prices, environmental and permitting costs associated with domestic mineral or energy resource development, accessibility to domestic mineral or energy resources, and level of public support for mineral and energy resource development on Federal lands.

Road construction and reconstruction for locatable mineral exploration and development is a right of access as provided by the General Mining Law, and therefore there are no anticipated changes in locatable mineral production and associated costs and benefits under the proposed rule.

Under the proposed rule, construction or reconstruction of roads that are reasonable and necessary for development of existing energy or mineral leases, for access to new or existing energy or mineral leases, and for access to associated product conveyance lines could be allowed as necessary in accordance with the terms of the lease, where they are consistent with land management plans. The removal of prohibitions within the potentially affected IRAs could generate renewed interest in mineral leasing where road building was previously not allowed. In accordance with the terms of the lease, approval of operations involving road building within areas previously designated as IRA would be more likely

Forest Service NVUM Program), the annual economic benefit associated with recreation in the likely operable and likely operable but complex areas is $477 million for trail-based and dispersed recreation and $131 million for wildlife-related recreation. On average per region, NFS harvests less than 1 percent of operable areas annually (Forest Service Cut and Sold Reports 2014-2024, USDA Forest Service 2025c). Assuming an upper limit of a 1 percent annual loss of economic benefit within the likely operable and likely operable but complex areas translate into potential annual losses for trail and dispersed area recreation of $4.8 million and $1.3 million for wildlife-related recreation, nationally. Any losses could be temporary if the conditions of landscapes altered in the course of management activity trend back towards prior conditions (e.g., temporary roads used in management revert to native vegetation and are closed to traffic). USDA is interested in comments on analysis of rule impacts on recreation upon implementation of the proposed rule.

Fuels Management and Wildfire

Timber harvest, mechanical thinning, and prescribed fire remain the primary tools for restoring and maintaining healthy ecological conditions on NFS lands. These activities reduce hazardous fuel loads, lower wildfire risk, improve habitat for fish and wildlife, and support the long-term sustainability of forest ecosystems.

The proposed rule allows for additional flexibility to manage wildfire within inventoried roadless areas. Of particular concern is the potential effect of wildfire in the wildland–urban interface (WUI), where communities and infrastructure are most vulnerable. With increased road construction, there could be increased hazard (which carries a cost) from human-caused ignitions and increased opportunities for wildfire risk mitigation (which carries costs and benefits). Although lifting restrictions on road construction could expand treatment options in the WUI, the high cost of road building and declining budgets for road construction and maintenance mean the overall increase in treatment capacity would be modest.

Under the proposed rule, additional active forest management, including some level of road construction, would likely occur with the extent varying by location. With increased road construction, especially open-access roads, and other human activity, there could be increased hazard from human-caused ignitions. If there is an increase in public road access, the number and frequency of wildfires could rise (though public access could be limited, to minimize fire hazard in high-risk areas).

The proposed rule would also provide increased opportunities for wildfire risk mitigation, especially within higher risk firesheds or other priority areas (such as near communities) and activities that involve mechanical treatment or are integrated with vegetation management. Substantial acreage within potentially affected IRAs has a relatively high likelihood of burning under high-intensity conditions that are difficult to manage or that could expose communities, infrastructure, or drinking-water sources. These areas may therefore represent priority opportunities for hazardous fuel reduction. In addition, certain strategically placed roads may confer fire control benefits not currently attainable.

While wildfire risk reduction in IRAs is not quantified in this analysis, any reduction in risk provides meaningful benefits to the public, industry, and the agency. These benefits include reduced risk to homes and communities, protection of clean drinking water supplies, preservation of forest products vital to local economies, uninterrupted power and communication services, sustained access to recreational sites, and maintenance of healthy ecosystems. Such benefits can be measured in terms of avoided costs, for example, the costs of replacing destroyed homes, businesses, powerlines, communication infrastructure, timber resources, recreation facilities, and water treatment capacity following a wildfire.

The Hjerpe and Aldrich (2018) analysis derived a total annual passive use value by multiplying the mean willingness to pay by U.S. households and reducing the estimate to account for households living below the poverty line and a reduction for households living far away from roadless areas, revealing a total passive use value of $10 billion dollars (2025 dollars). A per acre value is obtained by dividing this value by the number of roadless acres for an average willingness to pay of $238 per acre (2025 dollars). This willingness to pay value is adopted as a proxy for measuring forgone conservation value from potential harvest in roadless through changes in roadless designations.

The $238 willingness-to-pay-per-acre value was applied to an estimate of total acres in operable areas to estimate loss of passive use benefits to U.S. residents. Willingness to pay values were applied to estimates of total likely operable areas (2.2 million acres) and likely operable but complex areas nationwide (2.6 million acres). In all regions, less than 1 percent of likely operable and likely operable but complex land area is anticipated to be involved in timber harvest or road construction annually under the proposed rule. This provides a maximum range of $5.3 to $11.5 million annually in forgone passive use values from roadless areas that would be harvested.

Net Present Value of Benefits and Costs

Net benefits (costs subtracted from benefits) described above are discounted over 15 years and at both 3 and 7 percent, per OMB Circular A-4 - Regulatory Analysis (2003) and as shown in Table 4, the net present value discounted at 3 percent over 15 years is estimated to be -$92 to $199 million (-$70 to $152 million discounted at 7 percent) and uses maximum potential costs and benefits that do not account for uncertainty.[5] For example, it is uncertain how much of the estimated timber volume in operable areas will be harvested annually so maximum potential annual harvest is assumed. Actual harvest depends on many things, such as site-specific resource considerations and market conditions. Detailed below are ways that the benefits and costs could differ from the maximum potential values and shows how NPV could be positive if maximum potential benefits occur alongside lower costs (the NPV upper bound).

Passive use value losses from estimated annual harvest in roadless areas could also be less than the maximum potential estimated. It is uncertain how much of the estimated timber volume in operable areas will be harvested annually so maximum potential annual harvest is used to estimate passive use value losses. Actual harvest, and associated loss in passive use value, depends on many things, such as site-specific resource considerations and market conditions. Even if areas are harvested, these services and benefits would still be provided, per legal requirements (for example, NFMA implementing regulations, 36 CFR Part 219) to provide for ecological sustainability, species of concern, and multiple uses such as wildlife habitat and clean water, but at possibly lower or altered levels from those valued.

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[4] The National Forest Management Act (NFMA) directs that forest plans assure that timber will be harvested from National Forest System lands only where soil, slope, or other watershed conditions will not be irreversibly damaged. 16 U.S.C. 1604(g)(3)(E). In addition, the harvest of timber is subject to the legal context (for example, Clean Water Act, Clean Air Act, Endangered Species Act, National Historic Preservation Act, etc.) within which forest plans and site-specific environmental analyses (NEPA) are performed.

[5] The upper bound NPV is the sum of the high estimate of timber benefits to society and low estimate of forgone passive use value. The lower bound NPV is the opposite, summing the low estimate of timber benefits to society, the high estimate of forgone passive use value, and forgone recreation benefits. The intent is to provide high and low estimates of revenue and costs to 'bound' the NPV range within the realm of plausible outcomes.

Table 4. Benefits and Costs of Proposed Rule

Category	Primary Estimate	Minimum Estimate	Maximum Estimate
Annual timber benefit to society	N/A	$9.9 million	$22.0 million
Unquantified benefits	Increased recreation access; reduced wildfire risk; greater management flexibility	N/A	N/A
Annual costs[6]	N/A	-$5.3 million	-$17.6 million
Qualitative (unquantified) costs	Degraded recreation quality; ecological and water impacts; increased ignition risk; agency road maintenance burden	N/A	N/A
Minerals and Energy	No change in domestic leasable minerals production	N/A	N/A
Seafood Processing	Given the small amount of operable areas for timber harvest in roadless areas, no significant effects	N/A	N/A
Annual transfers[7]	N/A	$0	$9 million
Effects on small entities	Potential small shifts in receipts for timber, recreation, and minerals firms; minimal significant impacts expected	N/A	N/A

The cost benefit analysis discusses potential industry impacts in more detail for timber, recreation and tourism, commercial fishing and seafood processing, mineral and energy though USDA is interested in comments on what evidence demonstrates whether the industries would experience direct effects or distributional effects or both, with a description of the data and analytic methods used to determine these effects.

[6] Costs include forgone recreation benefits (minimum of $6.1 million annually) and forgone passive use values ($5.3 to $11.5 million annually) from increases in timber harvest in roadless areas. Lost recreation visitation expenditures are gross spending (trip costs) so they were excluded from cost estimates to avoid double counting with the forgone recreation benefits (consumer surplus).

[7] Transfers are the recreation expenditure loss.

NAICS Codes	NAICS Industry Description	Small Business Size Standard (SBA)
721110	Hotels (except Casino Hotels) and Motels	$40 million
721120	Casino Hotels	$40 million
721191	Bed-and-Breakfast Inns	$9 million
721199	All Other Traveler Accommodation	$9 million
721211	RV (Recreational Vehicle) Parks and Campgrounds	$10 million
721214	Recreational and Vacation Camps (except Campgrounds)	$9 million
721310	Rooming and Boarding Houses, Dormitories, and Workers' Camps	$14 million
722511	Full-Service Restaurants	$11.5 million
722513	Limited-Service Restaurants	$13.5 million
Mining and Energy		
212220	Gold Ore and Silver Ore Mining	1,500 employees
212230	Copper, Nickel, Lead, and Zinc Mining	1,400 employees
211120	Crude Petroleum Extraction	1,250 employees
211130	Natural Gas Extraction	1,250 employees
212110	Coal Mining	1,250 employees
213111	Drilling Oil and Gas Wells	1,000 employees
213112	Support Activities for Oil and Gas Operations	$47 million
213113	Support Activities for Coal Mining	$27.5 million
221116	Geothermal Electric Power Generation	250 employees
237310	Highway, Street, and Bridge Construction	$45 million

Source: Small Business Administration small business standards effective March 17, 2023 (SBA 2023).

Averaging the revenues of a dispersed set of small businesses in an analysis of regulatory impacts can cause the majority of small businesses to be misrepresented. The Small Business Administration provides revenues across 16 business size breakouts and recommends performing regulatory analysis on finer-grained size-groups than an average based on the thresholds identified in Table 5 (McManus 2018). The Statistics of U.S. Businesses, a U.S. Census Bureau dataset cosponsored by the Office of Advocacy and used here, shows that most industries are made up of a significantly larger number of businesses with fewer than 20 employees (or "sub-20" businesses). For example, sub-20 sawmill businesses (NAICS 321113) make up more than 70 percent of the firms with less than 500 employees and average receipts per firm were much smaller ($2 vs $10 million, in 2025 dollars) (U.S. Census Bureau. 2025).

Average receipts for sub-20 businesses in Table 5 are used in the analysis of effects to small businesses. Eighty-five percent of the logging and harvesting firms (NAICS 11) and wood product manufacturers (NAICS 32) were sub-20 firms employing less than 20 people (10,214 sub-20 firms of 12,017 total). For these sub-20 firms average receipts per firm was $1.6 million in 2022 (reported in 2025 dollars) and the average number of employees per firm was 5 (Table 6).

Recreation related firms depicted in Table 5 and used in analysis were selected based on surveys of national forest and grassland recreation visitor spending patterns conducted as part of the NVUM Program for all national forests and grasslands across the nation. Seventy-six percent of the recreation related industries in Table 5 were sub-20 firms (409,318 sub-20 firms of 537,135 total) employing less

than 20 people. Average receipts per firm was $19,000 in 2022 (in 2025 dollars) and the average number of employees per firm was 6 (Table 6).

Seventy-seven percent of mining and energy related firms in Table 6 were sub-20 firms employing less than 20 people in 2022. For these minerals and energy sub-20 firms average receipts per firm were $2.2 million (in 2025 dollars) and the average number of employees per firm was 4 (Table 6).

Table 6. Characteristics of sub-20 firms (U.S. Census Bureau. 2025)

	Percent sub-20	Sub-20 count	Total firm count	Average receipts per firm (millions of 2025 $)	Average number of employees per firm
Logging, harvesting and wood product manufacturing	85%	10,214	12,017	$1.57	5
Recreation	76%	409,318	537,135	$19.14	6
Mining and Energy	77%	17,538	22,642	$2.23	4

Small Business Opportunities and Effects

Methods used to examine the impacts to small business opportunities rely on recreation expenditure related to visitors associated with roadless, stumpage value from average annual harvest estimates, reasonably foreseeable minerals development and other effects from the DEIS for the proposed rule. Resource areas discussed include timber and wood products, recreation, and minerals. Analysis of these sectors uses information from the analysis of effects from the DEIS and descriptions of small entity characteristics.

Timber Industry

Under the proposed rule, more acres of suitable land would allow the Forest Service greater flexibility in the selection of future timber sale areas, as well as the potential for more flexibility in sale design, depending on the planning areas selected. This improved flexibility could, in turn, potentially improve the Forest Service's ability to offer economic sales that meet the needs of industry.

The ***Cost Benefit Analysis*** section above provides an analysis of delivered log value under the proposed rule that could increase by approximately $4.6 to $10.6 million annually. This increase is hypothetical because harvest has not been proposed under the current baseline in areas designated as roadless. Stumpage value increase would accrue to both small and large entities purchasing timber as depicted in Table 4, however only sub-20 firms are used to narrow the scope on finer-grained size-groups as recommended by the Small Business Administration (McManus 2018). The high and low range of industry effects is from $4.6 to $10.6 million annually, divided by the total sub-20 firm receipts for sub-20 firms results in a change ranging from 0.03 to 0.07 percent of average annual receipts (U.S. Census Bureau 2025). These estimates provide a range for consideration of potential stumpage value change to the timber industry and should not be used as precise estimates outside this analysis.

Recreation Industry

The proposed rule has the potential to affect recreation opportunities or desirable landscape conditions on national forests. In the short-term, associated recreation expenditures in communities near potentially affected roadless areas would likely be similar to baseline conditions. In the long-term, losses in trail and dispersed recreation visits (from changes in the recreation opportunities or desirable landscape conditions)