BEYOND VISITOR SPENDING: THE ECONOMIC CONTRIBUTION OF RESTORED ACCESS UNDER RESCISSION OF THE 2001 ROADLESS RULE

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BLUERIBBON COALITION

Supplemental report submitted by BlueRibbon Coalition with its comments on the proposed rescission of the 2001 Roadless Area Conservation Rule, the draft environmental impact statement and the cost-benefit analysis. Docket FS-2025-0001, RIN 0596-AD66. Third in a series with *Recreation Use Value Evidence Supporting Rescission of the 2001 Roadless Rule* and *National Forest Recreation Visitation and the Recreation Value of Roadless Rule Rescission*.

1,060	$58M	$108M	$174M	$9.0B
JOBS A YEAR PER 1% OF RECREATION RETAINED OR RESTORED	LABOR INCOME A YEAR PER 1%	VALUE ADDED A YEAR PER 1%	ECONOMIC OUTPUT A YEAR PER 1%	LOCAL VISITOR SPENDING, NON-SKI NATIONAL FOREST RECREATION, FY2024

SUMMARY OF FINDINGS

Each 1 percent of national forest recreation that rescission retains or restores supports about 1,060 jobs, $58 million in labor income, $108 million in value added and $174 million in economic output each year. These figures use the four measures the National Park Service reports in its annual Visitor Spending Effects series, built from the Forest Service's own visitor spending data.

The cost-benefit analysis accompanying the proposed rule does not report this layer. It quantifies a possible recreation loss of $6.1 million a year from reduced quiet, remote recreation. It describes the offsetting gain, the expansion of road-based recreation, only as "uncertain" and "limited," and assigns it no value. Neither the agency's analysis nor the two federal benchmark datasets measure what recreation access supports in jobs and income in the communities around inventoried roadless areas (IRAs).

Valued with the agency's own per-day estimates (Bowker et al. 2009), a 0.25 percent change in road-dependent national forest recreation is worth about $22 million a year to recreationists, more than three times the loss the agency quantified. Retaining or restoring less than one-tenth of 1 percent of that use would offset the $6.1 million entirely. These consumer-surplus values come from the companion visitation report and are directly comparable to the agency's loss figure.

The stakes are large. Non-ski recreation on national forests supported an estimated $9.0 billion in local visitor spending, 106,000 jobs and $10.8 billion in value added in FY2024. The 2001 Rule's prohibition on road reconstruction puts part of that base at risk as existing roads into and along IRAs wash out, burn or fail and cannot be rebuilt. Rescission removes that constraint.

We ask the Forest Service to add an economic contribution analysis of road-based recreation to the final cost-benefit analysis, using its own NVUM spending profiles and FEAST models, and to report gains on the same footing as losses.

PURPOSE AND PLACE IN THE RECORD

This report adds the market economic layer to the recreation evidence BRC has placed in the record. The three reports answer different questions and use different measures, so their figures should not be added together.

REPORT	QUESTION ANSWERED	MEASURE
Recreation Use Value Evidence Supporting Rescission of the 2001 Roadless Rule	What is a day of road-accessed recreation worth to the visitor?	Net economic value (consumer surplus) per person per day
National Forest Recreation Visitation and the Recreation Value of Roadless Rule Rescission	How much national forest recreation depends on roads, and what is it worth?	Visits, and net economic value per year
This report	What jobs and income does that recreation support in nearby economies?	Jobs, labor income, value added and economic output

The first two reports measure benefits to recreationists. This report measures economic activity in gateway communities. The agency's $6.1 million loss estimate is a consumer-surplus figure and is best compared with the second report, which values each 1 percent of road-dependent national forest recreation at about $89 million a year in net economic value. The figures here measure a different effect, the activity that visitor spending supports in regional economies, and inform the agency's regulatory flexibility and distributional analysis rather than its net-benefit total.

THE FEDERAL FRAMEWORK: VISITOR SPENDING IS ONLY THE FIRST ROUND

Two federal statistical programs establish that recreation's economic contribution extends well beyond what visitors spend. Both measure activity that exists today. Neither measures how a change in land management would change it, which is the gap this report fills.

National Park Service Visitor Spending Effects. NPS multiplies visits by survey-based spending profiles and runs the result through regional input-output multipliers. Its 2024 report found $29 billion in visitor spending near parks supported $18.8 billion in labor income and $56.3 billion in economic output nationally. Each dollar of visitor spending supported about 65 cents of labor income and $1.94 of output.

Bureau of Economic Analysis Outdoor Recreation Satellite Account. BEA measures outdoor recreation inside the national accounts. In 2024, it accounted for $696.7 billion in value added, 2.4 percent of GDP. BEA breaks that total out by activity. Many of the activities are tied to roads on public land:

ACTIVITY (BEA CONVENTIONAL CATEGORY)	2024 VALUE ADDED ($ MILLIONS)
RVing	27,453
Motorcycling/ATVing	11,382
Fishing (excluding boating)	8,746
Hunting/Trapping	8,348
Climbing/Hiking/Tent Camping	7,750
Equestrian	7,268
Other snow activities (includes snowmobiling)	3,771

> Source: BEA, Outdoor Recreation Value Added by Activity, Table 2, current dollars. BEA counts the trips-and-travel spending these activities generate separately, as $252.9 billion in supporting value added.

The Forest Service's own equivalent. The agency runs the same kind of analysis for national forests through its National Visitor Use Monitoring (NVUM) program. In FY2019, recreation visitors spent about $10.1 billion within 50 miles of national forests, which contributed about $12.5 billion to GDP and sustained about 154,000 jobs (NVUM National Summary Report 2020, Table 15). The agency also maintains forest-level contribution models (FEAST, built on IMPLAN).

The tools to measure the economic effect of rescission are already in the agency's hands.

WHAT THE 2001 RULE CONSTRAINS

The 2001 Rule prohibits road reconstruction as well as new road construction, so it limits both new access and the upkeep of access that exists today. About 44.8 million acres of IRAs remain under the 2001 Rule once Idaho and Colorado, governed by their own state rules, are set aside. That is 23 percent of the National Forest System.

The proposed rule identifies where rescission would matter most:

AREA	ACRES (MILLIONS)	SHARE OF POTENTIALLY AFFECTED IRAS
Forest plans allow permanent roads, 2001 Rule prohibits them	18.2	45.5%
Within 0.5 mile of existing roads	11.3	28.3%
IRA overlap with the wildland-urban interface	9.8	24%
Operable and open to timber harvest under forest plans	4.8	16% of forested IRA area

The 11.3 million acres within half a mile of existing roads are where retention matters. Roads at IRA edges and inside IRAs reach trailheads, dispersed campsites, fishing access and hunting units. Routine maintenance is allowed, but reconstruction is prohibited outside narrow exceptions in 36 CFR 294.12(b), such as imminent threats to public safety or realignment to prevent irreparable resource damage. When a culvert fails or a fire damages a road segment and no exception applies, the access that road served can be lost. The agency's own $6.9 billion deferred maintenance backlog for roads and bridges means these failures are not hypothetical.

The 18.2 million acres where forest plans already allow roads mark the outer bound of new access. The agency expects new road building there to be constrained by budget, conservation objectives and terrain. This report therefore does not assume large-scale road building. It measures the economic value of each increment of access retained or restored, which the agency can apply to whatever level of change it projects.

METHOD

The method follows the NPS Visitor Spending Effects model and uses only federal inputs: visits, times spending per visit, times economic ratios. Each input comes from the Forest Service, NPS or BEA.

$$\text{Contribution} = \Delta\text{Visits} \times \text{Spending per visit} \times \text{Economic ratio}$$

INPUT	VALUE (2024 DOLLARS)	SOURCE
Base: FY2024 non-ski national forest visits	138.6 million	164.2 million FY2024 visits (FICOR interagency report), less the downhill-ski share in NVUM Table 15 (15.5%)
Local spending per non-ski visit	$64.74	NVUM Table 15: $6.68 billion over 126.6 million non-ski visits (FY2019), adjusted to 2024 by CPI-U
Value added per non-ski visit	$77.83	NVUM Table 15: $8.03 billion GDP contribution over 126.6 million visits, CPI-U adjusted
Jobs per $1 million of spending	11.8	NVUM Table 15: 97,000 jobs over $6.68 billion, CPI-U adjusted

INPUT	VALUE (2024 DOLLARS)	SOURCE
Labor income per $1 of spending	$0.65	NPS 2024 VSE: $18.8 billion over $29 billion
Economic output per $1 of spending	$1.94	NPS 2024 VSE: $56.3 billion over $29 billion

Downhill skiing is excluded because ski areas operate under permits on developed sites and are not the use at issue. Wildlife-related and all other recreation visits are combined, as NVUM reports them.

The Forest Service and NPS ratios agree closely. Forest Service visitor spending supports 11.8 jobs per $1 million in 2024 dollars, and NPS visitor spending supports 11.7 (340,000 jobs over $29 billion). Labor income and output come from NPS because NVUM Table 15 reports only jobs and GDP.

The change in visits is the input the agency is best placed to estimate, using forest-level NVUM data and its road inventory. Consistent with the companion visitation report, this report does not assume a single figure. It reports results per 1 percent of the non-ski base, about 1.39 million visits, and across a range of 0.25 to 2 percent.

RESULTS

At 1 percent of non-ski national forest visitation, recreation access retained or restored by rescission supports about 1,060 jobs and $108 million in value added a year. Results scale in direct proportion to the change in visits.

SHARE OF NON-SKI VISITS RETAINED OR RESTORED	VISITS (MILLIONS)	LOCAL VISITOR SPENDING ($M)	JOBS	LABOR INCOME ($M)	VALUE ADDED ($M)	ECONOMIC OUTPUT ($M)
0.25%	0.35	22	270	15	27	44
0.5%	0.69	45	530	29	54	87
1%	1.39	90	1,060	58	108	174
2%	2.77	179	2,120	116	216	348
Full non-ski base (for scale)	138.6	8,970	106,000	5,820	10,790	17,420

> Annual figures, 2024 dollars, national totals including secondary effects. Every million visits retained or restored supports about 770 jobs, $42 million in labor income, $78 million in value added and $126 million in output.

Access retention. The most direct effect of rescission is keeping existing access usable. The rule's reconstruction prohibition applies to roads already in service, so its cost grows each year that damaged segments go unrepaired. Visits retained this way are existing visits, so their spending is already part of the gateway economy and does not depend on attracting new demand.

Restored and new access. Within the 18.2 million acres where forest plans permit roads, new or reopened access would add visitation where the agency's transportation planning supports it. The proposed rule expects this to be limited in the near term, so the lower rows of the table are the more realistic near-term range.

Management activity. The proposed rule estimates that harvest on operable IRA acres could raise National Forest System sawtimber harvest 5 to 10 percent, with $5.2 to $11.4 million a year to the Treasury and Forest Service and $4.6 to $10.6 million to the timber industry. The agency did not convert that volume to jobs or income. It also identifies 9.8 million acres of IRA overlapping the wildland-urban interface where fuels work would become possible. Both effects support employment in the same rural counties as the recreation effects, and both belong in the final analysis.

LIMITS OF THIS ANALYSIS

These are economic contribution estimates, the same type NPS and BEA publish. They measure activity supported in regional economies, not net national gains, and they should be read with the limits below.

LIMIT	EFFECT ON RESULTS	HOW THE AGENCY CAN RESOLVE IT
Contribution, not net impact. Some spending lost at one forest may shift to another site.	National totals overstate net national change; regional effects in IRA counties are more robust.	Report effects by forest analysis area, as FEAST already does.
Change in visits not estimated here	Results are scaled per 1 percent, not a single projection.	Estimate road-dependent visits near IRAs from forest-level NVUM and road inventory data.
Spending profiles from FY2019, adjusted by CPI-U	Changes in spending mix since 2019 are not captured.	Use the agency's current NVUM spending profiles.
Labor income and output ratios from NPS	Park visitors stay overnight more often than forest visitors, so these ratios may run high. Forest Service and NPS jobs ratios match closely, which limits the error.	Use FEAST ratios for each forest.
Displaced quiet recreation	Some visitors seeking remote settings may visit less. The agency values this at $6.1 million a year in consumer surplus.	Report the market effects of displacement and of added access on the same basis.

These estimates are consistent with the agency's finding that near-term on-the-ground change will be bounded by forest plans, budgets and operability. They do not assume large-scale road building. They show that even modest changes in access support jobs and income the cost-benefit analysis does not report. As the Summary of findings shows, the same holds for benefits to recreationists: a small change in road-dependent use outweighs the recreation loss the agency quantified.

REQUESTS TO THE FOREST SERVICE

1. Add an economic contribution analysis of road-based recreation to the final cost-benefit analysis, reporting jobs, labor income, value added and output, the measures NPS and BEA use.
2. Quantify recreation gains on the same basis as the $6.1 million recreation loss, rather than describing them only as uncertain and limited. At the agency's own per-day values, a change of less than one-tenth of 1 percent in road-dependent use would offset that loss.
3. Estimate the road-dependent visits at risk under the reconstruction prohibition, using forest-level NVUM data and the road inventory for roads within and along IRAs, including roads affected by the $6.9 billion deferred maintenance backlog.
4. Run the estimate through the agency's FEAST models with current NVUM spending profiles, and report results by forest analysis area so effects on rural gateway counties are visible.
5. Convert the projected 5 to 10 percent increase in sawtimber harvest, and fuels work on the 9.8 million acres of IRA in the wildland-urban interface, into jobs and labor income.
6. Report these effects in the regulatory flexibility analysis, since the outfitters, guides, lodging, food service and retail businesses near IRAs are predominantly small entities.

SOURCES

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- National Park Service. Sept. 25, 2025. National Park Visitor Spending Contributed $56 Billion to the U.S. Economy in 2024. 2024 Visitor Spending Effects results; jobs figure (340,000) from the full report.
- National Park Service. Visitor Spending Effects interactive tool.
- Bureau of Economic Analysis. Mar. 5, 2026. Outdoor Recreation Economic Statistics, U.S. and States, 2024; Value Added by Activity tables, Table 2.
- Federal Interagency Council on Outdoor Recreation. June 2026. FY 2024 Interagency Recreation Visitation Data Report. National forest visits, FY2024.
- Bureau of Labor Statistics. CPI-U, U.S. city average, annual averages 2019 (255.657) and 2024 (313.689).
- Companion reports: *Recreation Use Value Evidence Supporting Rescission of the 2001 Roadless Rule* and *National Forest Recreation Visitation and the Recreation Value of Roadless Rule Rescission* (BlueRibbon Coalition, Oct. 6, 2026).

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