



**RUNNERS FOR
PUBLIC LANDS**

September 18, 2025

Director
Ecosystem Management Coordination
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124

**Re: Runners for Public Lands Opposition to Rescission of the Roadless Area
Conservation Rule (Roadless Rule), Docket No. FS-2025-0001**

To Whom It May Concern:

On behalf of Runners for Public Lands (“RPL”), a national nonprofit organization committed to the protection of public lands and the promotion of access to nature for all, I respectfully submit these comments in strong opposition to the proposed rescission of the 2001 Roadless Area Conservation Rule (“Roadless Rule”), 66 Fed. Reg. 3244 (Jan. 12, 2001), codified at 36 C.F.R. pt. 294.

For nearly twenty-five years, the Roadless Rule has provided a uniform, legally sound, and ecologically vital framework for the stewardship of approximately 58 million acres of Inventoried Roadless Areas (“IRAs”) across the National Forest System. Enacted pursuant to the National Forest Management Act (NFMA), 16 U.S.C. § 1604, and following one of the most extensive public participation processes in Forest Service history, the Rule has been upheld repeatedly in federal court, including by the Tenth Circuit Court of Appeals.¹ The U.S. Department of Agriculture now proposes to rescind this durable framework² in favor of ad hoc local discretion, thereby imperiling both the ecological integrity of IRAs and the recreational, cultural, and economic benefits they sustain.

From the perspective of the running community, rescission is uniquely destructive. Trail runners—including many engaged in ultramarathon events—rely on IRAs as the only landscapes capable of supporting organized races in truly wild settings. By law, special recreation events are prohibited in congressionally designated Wilderness. Consequently, IRAs function as the principal venues where runners can gather for events that simultaneously test their endurance while also enjoying the nation’s last remaining undeveloped forests. The removal of national protections for these areas would thus strike at the very heart of trail running culture.

The Western States 100 Endurance Run in California illustrates this reliance with particular force. The course—21% of which falls within an IRA—originates in the Granite Chief Wilderness and proceeds for substantial mileage through IRAs of the Tahoe and Eldorado National Forests, landscapes that owe their wild and undeveloped character to the Roadless Rule. The essential qualities that define Western States—the quiet of the high country, the purity of alpine headwaters, and the unbroken vistas—cannot coexist with road construction, timber sales,

¹ *Wyoming v. USDA*, 661 F.3d 1209 (10th Cir. 2011), cert. denied, 133 S. Ct. 417 (2012).

² The current USDA proposal to rescind the Roadless Rule applies to the 44.7 million acres of National Forest System lands where the 2001 Roadless Rule is in effect and excludes the states of Idaho and Colorado that have their own state-specific roadless rules.

or extractive operations. Runners who travel from across the globe to visit the Western States Trail do not seek to traverse logged parcels or hear machinery echoing through canyons; they seek an experience within intact, roadless backcountry.

The same analysis applies across multiple states. Utah's Wasatch Front 100 (30.78% in an IRA) and The Bear 100 traverse the Uinta-Wasatch-Cache National Forest, where IRAs provide the rugged and remote character essential to those events. Wyoming's Bighorn Trail Run (73% in an IRA) originates in Dayton, WY and ascends directly into Bighorn National Forest IRAs, supporting the economies of Sheridan County and introducing thousands of visitors to the Bighorns' unique landscapes. Washington State's Plain 100 in the Okanogan-Wenatchee National Forest, New Mexico's Jemez Mountain Trail Runs in the Sante Fe National Forest, and Alaska's Crow Pass Crossing in the Chugach National Forest all occur on courses that depend on the continuity of Roadless protections. Each race is not merely a recreational outing but an economic engine for its host community, sustaining hotels, restaurants, and small businesses, and fostering cultural identity rooted in wild landscapes.

The harm from rescission extends well beyond aesthetics. Roads fragment trail systems, disrupt the solitude upon which endurance running depends, and permanently degrade the runner's experience. Logging and industrial development impair air quality, degrade water sources that runners rely upon during long backcountry efforts, and introduce erosion and sediment into alpine streams. For trail runners, whose sport is defined by connection with landscape, these are not abstract injuries; they directly undermine health, safety, and the integrity of the experience.

Economically, the stakes are substantial. The outdoor recreation economy contributes more than \$1.1 trillion annually and supports over 5 million American jobs. The local economies of Auburn, California (the "Endurance Capital of the World"), Logan, Utah, and Sheridan, Wyoming depend heavily on the annual influx of participants, volunteers, and spectators drawn to IRA-based races. By authorizing roadbuilding and extractive uses that diminish the wild qualities of these landscapes, the Forest Service risks reducing visitation, depressing local revenues, and displacing a sustainable recreation economy in favor of short-term industrial gain.

Nor can rescission be credibly justified on wildfire grounds. The scientific record demonstrates that the vast majority of human-caused ignitions occur near existing roads, not within remote IRAs.³ Adding roads would increase, not mitigate, ignition risk. Further, studies show no evidence that fires in IRAs burn more severely than in roaded forests, and in fact, high-severity fires occur with greater frequency on industrial timberlands.⁴ Importantly, the Roadless Rule itself contains exceptions that expressly allow fuels reduction and fire suppression activities necessary to protect communities.⁵ The wildfire rationale advanced in the Notice of Intent is

³ See James D. Johnston et al., *Does conserving roadless wildland increase wildfire activity in western US national forests?*, 16 *Env'tl. Res. Letters* 084040 (2021); Jacob I. Levine et al., *Higher Incidence of High-Severity Fire in and Near Industrially Managed Forests*, 20 *Frontiers in Ecology & Env't* 397 (2022); *Wildfire Ignitions: A Review of the Science and Management* (USDA Forest Service, Prestemon et al. 2013) (humans directly or indirectly cause most wildfires; human-ignited fires tend to occur near "values at risk" which generally includes areas accessible by roads/infrastructure) rather than remote backcountry), https://www.srs.fs.usda.gov/pubs/gtr/gtr_srs171.pdf (last visited Sept. 18, 2025).

⁴ See Jacob I. Levine et al., *Higher Incidence of High-Severity Fire in and Near Industrially Managed Forests*, 20 *Frontiers in Ecology & Env't* 397 (2022).

⁵ 36 C.F.R. § 294.13(b).

therefore unsupported by science, inconsistent with the existing regulatory framework, and arbitrary in light of the agency's prior findings.

Finally, rescission is fiscally imprudent. The Forest Service already administers more than 368,000 miles of roads, more than any other federal agency, and faces a deferred maintenance backlog exceeding \$6 billion.⁶ Expanding this system into the most inaccessible terrain is indefensible when existing roads are undermaintained and communities await critical infrastructure investments.

In sum, rescission of the Roadless Rule would contravene NFMA, disregard judicial precedent, undermine the integrity of nationally significant recreation resources, and substitute an inconsistent patchwork of local planning for a proven national standard. For trail runners, the effect would be devastating: landscapes integral to training, racing, cultural identity, and local economies would be fragmented, degraded, and diminished beyond repair. Because these harms are permanent and irreversible, the agency must retain the Roadless Rule in full force and reject the proposed rescission.

Trail runners are among the most consistent, passionate stewards of these landscapes. Weakening their protection would be an irreversible step backward for public lands and the communities that depend on them.

Thank you for considering these comments and for your stewardship of our National Forests.

Sincerely,

A handwritten signature in black ink that reads "Kathleen Baker". The script is cursive and fluid.

Kathleen Baker
Executive Director
Runners for Public Lands

Runners for Public Lands is a 501(c)(3) nonprofit dedicated to protecting public lands and expanding access to nature. Our vision is a world in which everyone has access to healthy, runnable landscapes.

⁶ U.S. Government Accountability Office (GAO-24-106495), *Deferred Maintenance: Forest Service Transportation Assets* (2024); U.S. Forest Serv., *Five Year Deferred Maintenance Strategy: 2018-2022* 3 (2023), <https://www.governmentattic.org/51docs/USFS5YrDefMaintStrat2018-2022.pdf> (last visited Sept. 18, 2025).