



**RUNNERS FOR
PUBLIC LANDS**

September 22, 2025

Submitted via Regulations.gov / Docket No. EPA-HQ-OAR-2025-0194

U.S. Environmental Protection Agency
EPA Docket Center (EPA/DC) EPA-HQ-OAR-2025-0194
1200 Pennsylvania Avenue, NW Washington, DC 20460

**Subject: Runners for Public Lands Comments Opposing Reconsideration of the 2009
Endangerment Finding and GHG Vehicle Standards**

Runners for Public Lands (“RPL”) submits these comments in strong support of retaining and strengthening the U.S. Environmental Protection Agency’s 2009 Endangerment Finding. As a national nonprofit with the mission to empower runners to protect public lands and expand access to nature for all, RPL represents a constituency uniquely vulnerable to the health, economic, and environmental harms of climate change. Our members rely on clean air, healthy public lands, and stable climates to sustain their recreation, livelihoods, and communities. The Endangerment Finding provides the essential legal and scientific foundation for EPA to act on greenhouse gas emissions. Weakening or rescinding this authority would endanger not only ecological integrity but also the health and welfare of millions of Americans.

RPL is a national nonprofit whose mission is to “empower runners to protect public lands and expand access to nature for all,” with a vision of “a world in which everyone has access to healthy, runnable landscapes.”¹ As a community of athletes, advocates, and conservationists, RPL represents millions of runners who depend on intact public lands for recreation, health, and community well-being. Public lands are the foundation of the landscapes that sustain running and trail-based recreation across the United States. RPL inspires, educates, and mobilizes runners to take action on issues at the intersection of climate, public land management, and recreation policy. Through initiatives ranging from local trail clean-ups to the development of advocacy toolkits for running clubs and race directors, RPL ensures that environmental stewardship is embedded in the culture of running. These efforts connect everyday runners to the policy frameworks that determine the future of the places they depend on, and climate change is the most consequential environmental impact that we face as runners.

RPL’s commitment to conservation extends to federal-level engagement. At events such as TrailCon 2025, RPL partnered with Outdoor Alliance to convene thousands of runners and recreationists in dialogue on national land and climate policy, underscoring the depth of engagement within the running community and its interest in federal rulemaking processes.² Through this work, RPL channels the voice of a growing constituency that understands firsthand

¹ Runners for Public Lands, *About Us*, <https://www.runnersforpubliclands.org/about> (last visited Sept. 10, 2025).

² Outdoor Alliance, *Trip Report: Trailcon With Runners For Public Lands* (2025), <https://www.outdooralliance.org/blog/2025/7/2/trip-report-trailcon-with-runners-for-public-lands> (last visited Sept. 10, 2025).

the value of wild, undeveloped landscapes for recreation, community health, and climate resilience.

The Finding concluded that six greenhouse gases endanger public health and welfare under the Clean Air Act.³ That determination—grounded in extensive scientific evidence—remains the legal authority for EPA to regulate greenhouse gas emissions under Section 202(a).⁴ Without it, EPA could not implement the policies that directly mitigate the pollutants fueling poor air quality and unhealthy outdoor conditions. Weakening or rescinding the Endangerment Finding would strip EPA of its authority to address these harms, leaving runners and the broader public increasingly exposed to deteriorating conditions. Preserving and strengthening the Finding is essential to safeguarding public health, maintaining viable recreation economies, and ensuring that runners continue to have safe, healthy landscapes in which to train, compete, and connect with nature.

Why Rescinding the Endangerment Finding Threatens Runners

1. The Endangerment Finding Provides Essential Protections for Runners, Public Health, and the Recreation Economy

Runners are uniquely vulnerable to the health and environmental harms caused by climate change and air pollution. Unlike many populations, runners and endurance athletes spend extended periods outdoors, often at high exertion levels that increase their respiratory rate and volume. This dynamic magnifies the health risks associated with wildfire smoke, ozone smog, and extreme heat.⁵ In practical terms, conditions that might pose mild irritation for the general public, for the running community, the stakes are much higher. Ozone exposure during vigorous outdoor exercise has been consistently linked to adverse respiratory outcomes because athletes inhale more ozone deeper into their lungs, amplifying harmful effects such as airway inflammation, reduced lung function, and heightened the risk of asthma attacks—even in otherwise healthy adults.⁶ When coupled with extreme heat events—now longer and more frequent due to climate change—these conditions make outdoor running not only less enjoyable but medically dangerous. The cumulative effect is a narrowing of safe opportunities for training, community races, and recreational access, undermining both public health, our quality of life, and the welfare of our community.

³ Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act, 74 Fed. Reg. 66,496 (Dec. 15, 2009), <https://www.federalregister.gov/documents/2009/12/15/E9-29537/endangerment-and-cause-or-contribute-findings-for-greenhouse-gases-under-section-202a-of-the-clean> (last visited Sept. 11, 2025).

⁴ The Supreme Court’s ruling in *Massachusetts v. EPA* made clear that greenhouse gases are pollutants subject to regulation, and EPA’s Endangerment Finding, subsequently upheld by the D.C. Circuit, fulfilled that mandate. *Massachusetts v. EPA*, 549 U.S. 497 (2007); *Coal. for Responsible Regul., Inc. v. EPA*, 684 F.3d 102 (D.C. Cir. 2012).

⁵ González-Rojas, Sofia, et al., *Air Pollution and Endurance Exercise: A Systematic Review of the Potential Effects on Cardiopulmonary Health*, 15 *Life* (Basel) 595 (Apr. 3, 2025), doi:10.3390/life15040595. Found at <https://pmc.ncbi.nlm.nih.gov/articles/PMC12028381/> (last visited Sept. 11, 2025).

⁶ Am. Acad. of Allergy, Asthma & Immunology, *Even When Sedentary, Lung Function Drops in Healthy Adults After Exposure to Low Level Ozone* (March 2020), <https://www.aaaai.org/about/news/news/lung> (last visited Sept. 11, 2025).

Recent events make clear that the health and safety risks posed by climate-driven extremes are already disrupting the running community. In Oregon, the Cascades 100-mile ultramarathon was halted mid-race when wildfire smoke from the nearby Flat Fire pushed the Air Quality Index into the “hazardous” range, causing participants to suffer severe respiratory distress and prompting organizers to end the event early.⁷ Likewise, marathon organizers in Minnesota canceled both the Medtronic Twin Cities Marathon and a 10-mile companion race due to forecasted “extreme and dangerous” heat and humidity, issuing a rare “black flag” warning to safeguard athletes.⁸ Additionally, the Western States 100-mile Endurance Run—one of the most historic ultramarathons in the United States—was canceled for the first time in its 35-year history in 2008 due to hazardous air quality resulting from widespread wildfires in Northern California.⁹ This unprecedented cancellation highlights the tangible vulnerability of even long-standing events to worsening environmental conditions. These examples illustrate how climate change is not a future threat—it is a present hazard that runners face, underscoring the urgency of maintaining strong climate protections.

The economic consequences compound these health risks. Outdoor recreation contributes \$1.1 trillion annually to the U.S. economy and sustains 5 million jobs, according to the Bureau of Economic Analysis.¹⁰ Running is one of the most accessible and widely practiced outdoor sports, generating billions in consumer spending on events, travel, footwear, and equipment. When poor air quality cancels a marathon or wildfire smoke shuts down a trail race, communities lose vital revenue from lodging, restaurants, and retail sales. Gateway towns and rural economies—many of which rely heavily on recreation-based tourism—suffer disproportionately when environmental conditions make outdoor events unsafe or impossible. Thus, unchecked greenhouse gas emissions imperil not only runners’ health but also the livelihoods of communities built around running and outdoor recreation. Therefore, the EPA’s 2009 Endangerment Finding is essential to protecting runner health, and preserving the landscapes and economies where running takes place.

2. Degradation of Running Landscapes

Climate change is clearly affecting the running landscape—trails, roads, parks, and wildlands—that runners rely upon for recreation, fitness, and community. These examples are no longer isolated incidents but recurring conditions that limit safe and consistent outdoor exercise. For runners, the availability and quality of runnable landscapes remain directly tied to personal health, community life, and overall well-being. Concrete examples illustrate these challenges.

⁷ Andrew Dawson, Ultrarunners Call Out Oregon’s Cascades 100 for Wildfire Debacle, *Marathon Handbook* (Aug. 25, 2025), <https://marathonhandbook.com/ultrarunners-call-out-oregons-cascades-100-for-wildfire-debacle> (last visited Sept. 11, 2025).

⁸ Associated Press, *Twin Cities Marathon, 10-Mile Race Canceled Due to Extreme Heat*, *AP News* (Oct. 1, 2023), <https://apnews.com/article/8e909737cf7530c3eb101ff8f589a81e> (last visited Sept. 11, 2025).

⁹ *Fires, Smoke Force Cancellation of Western States 100*, *UltraRunning Magazine* (Aug. 15, 2013), <https://ultrarunning.com/ultrarunning-news/fires-smoke-force-cancellation-of-western-states-100/> (last visited Sept. 11, 2025).

¹⁰ Bureau of Econ. Analysis, U.S. Dep’t of Commerce, *Outdoor Recreation Satellite Account, U.S. and Prototype for States, 2022* (Nov. 2023), <https://www.bea.gov/news/2023/outdoor-recreation-satellite-account-us-and-states-2022#:~:text=Outdoor%20recreation%20by%20activity&text=In%202022%2C%20conventional%20outdoor%20recreation,with%2019.0%20percent%20in%202021> (last visited Sept. 10, 2025).

In the Pacific Northwest, recurring flooding events have caused substantial damage to trail systems and access roads within national parks, disrupting recreation and requiring costly repairs. At Mount Rainier National Park, for instance, a November 2006 storm dropped nearly 18 inches of rain in just 36 hours—washing out roads, trails, campgrounds, and infrastructure and inflicting over \$36 million in damage.¹¹ More recently, in Olympic National Park, heavy rainfall in late 2024 washed out the embankment of Upper Hoh Road—the sole vehicular access to the Hoh Rain Forest visitor center, campgrounds, and trailheads—leading to an extended closure and limiting public access to this popular recreation area.¹² In the Southwest, organizers are increasingly confronted with extreme heat risks during summer races. For example, in Arizona, event officials from Pat’s Run announced expanded safety measures—such as additional medical staff, hydration stations, and dynamic race alerts—as record-setting temperatures spurred concern over runner safety.¹³ In Nevada, while specific race cancellations are not always documented, the trend toward increasingly frequent and intense “danger” heat days—when the heat index reaches 105°F or higher—is well established. This pattern underscores growing risks for summer athletic events and outdoor training. In the Las Vegas region, historical data shows a rise from approximately 3 such days per year to projections of over 30 by mid-century and up to 60 by century’s end—highlighting urgent concerns for athlete safety under extreme conditions.¹⁴

At the community level, high school outdoor sports in regions like Los Angeles and Salt Lake City have also been disrupted. In Los Angeles County, cross-country and tennis practices have been canceled when wildfire smoke caused AQI readings to rise into unhealthy zones, forcing teams to stay indoors due to unsafe air quality.¹⁵ Similarly, in northern Utah, exceptionally poor air quality—driven by wildfire smoke—led the Canyons School District to cancel all outdoor extracurricular activities, including football games and youth sports.¹⁶ These disruptions demonstrate how climate change directly undermines the spaces and opportunities runners rely on daily, and underscore how climate-driven extreme weather is actively undermining runnable public lands, diminishing safe and reliable access for outdoor athletes and communities.

The economic consequences of degraded landscapes are equally significant. When races are canceled due to wildfire smoke, flooding, or extreme heat, gateway communities lose critical income from lodging, restaurants, and local businesses. For instance, the cancellation of the

¹¹ Nat’l Park Serv., *November 2006 Flooding at Mount Rainier National Park* (2006), <https://www.nps.gov/mora/learn/news/november-2006-flooding.htm> (last visited Sept. 11, 2025).

¹² National Park Explorer, *Hoh Rain Forest visitors cancel plans as road damage forces indefinite closure* (Mar. 7, 2025), <https://natlpark.com/2025/03/hoh-rainforest-visitors-cancel-plans-as-road-damage-forces-indefinite-closure> (last visited Sept. 11, 2025).

¹³ Holly Bock, *Organizers of Pat’s Run, Country Thunder Prepare for Record Heat in Arizona*, AZFamily (Apr. 9, 2025), <https://www.azfamily.com/2025/04/10/organizers-pats-run-country-thunder-prepare-record-heat-arizona/> (last visited Sept. 11, 2025).

¹⁴ Climate Cent., *Extreme Heat: When Outdoor Sports Become Risky* (Aug. 21, 2019), <https://www.climatecentral.org/report/extreme-heat-when-outdoor-sports-become-risky-2019> (last visited Sept. 10, 2025) (noting that cities such as Reno and Las Vegas have seen extreme heat days—heat index above 90°F—rise dramatically, and danger days—105°F+—are increasing).

¹⁵ George Wang, *Wildfires and Poor Air Quality Impact School Sports*, WHSHoofprint (Sept. 22, 2024), <https://whshoofprint.com/3022/sports/wildfires-and-poor-air-quality-impact-school-sports/> (last visited Sept. 11, 2025).

¹⁶ *Some Outdoor Activities Canceled Due to Utah’s Air Quality*, Fox 13 Now (Aug. 6, 2021), <https://www.fox13now.com/weather/air-quality/some-school-activities-canceled-due-to-utahs-air-quality> (last visited Sept. 11, 2025).

Western States Endurance Run not only disappointed athletes but also cost the Auburn and Squaw Valley regions in lost visitor spending.¹⁷ Similarly, smaller trail races in rural mountain towns, which often serve as important economic drivers during the summer season, see immediate financial impacts when trails are closed or unsafe. These losses ripple outward—affecting not just race directors and runners, but also hotels, cafes, gear shops, and guiding services that depend on predictable outdoor access.

Without robust federal emissions policy, these landscapes face accelerating degradation. Rising temperatures, more frequent droughts, and intensifying storm events will erode trail systems, damage park facilities, and diminish access to public lands nationwide. The U.S. Global Change Research Program warns that climate-driven disturbances will continue to disrupt recreation infrastructure and reduce the quality of outdoor experiences if greenhouse gas emissions are not meaningfully reduced.¹⁸ In effect, the absence of strong regulatory action not only jeopardizes ecological health but also threatens to make landscapes unfit for safe running, undermining both public health and the recreation economies that depend on runnable landscapes.

Why Federal Action Is Essential

The Endangerment Finding is the legal cornerstone that enables EPA to regulate greenhouse gases under the Clean Air Act. Its removal would strip away protections that ensure clean air, safe outdoor recreation, and healthy public lands. For runners, the risks are particularly acute. Elevated exertion levels cause athletes to inhale pollutants—such as ozone and fine particulate matter from wildfire smoke—more deeply into their lungs, magnifying health risks.¹⁹ Extreme heat compounds these dangers, increasing the likelihood of heat-related illness, cardiovascular strain, and respiratory injury. Without enforceable federal authority to regulate greenhouse gas emissions, these conditions will worsen, reducing safe training days, forcing race cancellations, and undermining the health of entire communities.

Climate change is visibly degrading the runnable landscapes—trails, roads, parks, and wildlands—that sustain recreation and community well-being. Wildfires have closed trail networks across the West, flooding has destroyed park infrastructure, and extreme heat has rendered once-accessible routes unsafe for extended periods.²⁰ Such disruptions demonstrate that unchecked emissions directly imperil public lands and recreation. Federal action to reduce emissions is essential to preserve safe, accessible landscapes for present and future generations.

¹⁷ Gold Country Media, *Impacts on canceled Western States Endurance Run for runners, Auburn businesses* (June 2008), <https://goldcountrymedia.com/news/134692/impacts-on-canceled-western-states-endurance-run-for-runners-auburn-businesses/> (last visited Sept. 11, 2025).

¹⁸ U.S. Glob. Change Research Program, *Fourth Nat'l Climate Assessment, Volume II: Impacts, Risks, and Adaptation in the United States* ch. 7 (2018), <https://repository.library.noaa.gov/view/noaa/19487> (last visited Sept. 10, 2025).

¹⁹ González-Rojas, Sofía, et al., Air Pollution and Endurance Exercise: A Systematic Review of the Potential Effects on Cardiopulmonary Health, 15 *Life* (Basel) 595 (Apr. 3, 2025), <https://pubmed.ncbi.nlm.nih.gov/40283151/> (last visited Sept. 11, 2025).

²⁰ S. Thomas, E. E. Perry et al., Displacement Drivers and Types Across Recreationists in Southern California National Forests, *J. Outdoor Recreation & Tourism*, art. 100889 (2025), <https://doi.org/10.1016/j.jort.2025.100889> (last visited Sept. 11, 2025); J. E. Halofsky et al., Climate Change Vulnerability and Adaptation for Infrastructure and Outdoor Recreation in the Sierra Nevada (U.S. Forest Serv. Gen. Tech. Rep. PNW-GTR-297, 2021), <https://research.fs.usda.gov/treesearch/download/63209.pdf>, (last visited Sept. 11, 2025).

Access to nature for all is central to RPL’s mission. Many low-income neighborhoods, urban residents, and communities of color have historically lacked access to safe outdoor spaces.²¹ Climate change exacerbates these inequities by disproportionately exposing vulnerable populations to polluted air, urban heat islands, and degraded parks. For example, the EPA has found that minority and low-income communities are more likely to experience health risks from climate-driven air pollution.²² Rolling back federal climate safeguards would deepen these inequities, depriving underserved communities of opportunities to exercise outdoors and build resilience. Maintaining the Endangerment Finding reinforces equity and inclusion, ensuring that all people benefit from clean air and healthy landscapes.

Recommendations to the EPA

For the reasons set forth in these comments, Runners for Public Lands urges the Environmental Protection Agency to act decisively in protecting public health, runnable landscapes, and community well-being.

First, EPA should withdraw its proposed reconsideration of the 2009 Endangerment Finding and related vehicle standards. The Endangerment Finding is a well-supported scientific and legal determination that greenhouse gases endanger public health and welfare, and it remains the foundation for the Agency’s Clean Air Act authority. Revisiting or weakening this determination would undermine settled law and jeopardize public health and welfare nationwide.

Second, EPA should recognize runners and outdoor recreation participants as important stakeholders in climate policy. Tens of millions of Americans identify as runners, making it one of the country’s most widely practiced outdoor activities. As described in these comments, the health and safety of this community are directly affected by air quality and the condition of public lands. Treating runners as a stakeholder group—similar to hunters, anglers, and other recreation constituencies—ensures that the perspectives of those directly impacted by climate change are reflected in federal decision-making.

Third, EPA should expand adaptation and engagement programs that support community-based stewardship and resilience. Partnerships with local organizations, including running organizations such as RPL, can complement federal action by advancing civic engagement, promoting environmental stewardship, and enhancing resilience in the face of climate-driven disruptions.

Conclusion

Runners across the country are committed to protecting the environments that sustain their activity. Retaining and strengthening the 2009 Endangerment Finding is essential to preserving clean air, healthy landscapes, and equitable access to outdoor recreation. Runners for Public Lands stands ready to partner with the EPA in advancing climate policy that protects both public health and the runnable landscapes on which communities depend.

²¹ Runners for Public Lands, *About Us*, <https://www.runnersforpubliclands.org/about> (last visited Sept. 10, 2025).

²² U.S. Env’tl. Prot. Agency, *Climate Change and Social Vulnerability in the United States* (Sept. 2021), <https://www.epa.gov/cira/social-vulnerability-report> (last visited Sept. 11, 2025).

Sincerely,

A handwritten signature in black ink that reads "Kathleen Baker". The script is fluid and cursive, with the first letters of each word being capitalized and prominent.

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 mission is to empower runners to protect public lands and expand access to nature for all. Our vision is a world in which everyone has access to healthy, runnable landscapes.