



November 4, 2025

U.S. Department of the Interior
Director (630)
Bureau of Land Management
1849 C Street NW, Room 5646
Washington, DC 20240
Attention: 1004-AF03

Subject: Runners for Public Lands Comments Opposing Rescission of the Conservation and Landscape Health Rule (Public Land Rule), Docket No. BLM-2025-0001, RIN 1004-AF03

To Whom It May Concern:

Runners for Public Lands (“RPL”) submits these comments in strong opposition to the Bureau of Land Management’s (“BLM’s”) proposal to rescind the *Conservation and Landscape Health Rule* (the “Public Land Rule”). RPL is a national 501(c)(3) whose 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. The Public Land Rule recognizes that conservation and restoration are coequal with other uses under the Federal Land Policy Management Act’s multiple-use and sustained-yield mandate,¹ and provides durable tools to safeguard ecological integrity, recreational access, and community well-being. Rescission would discard those tools, skewing decisions toward short-term extractive uses at the expense of long-term public values—harming outdoor recreation, degrading irreplaceable landscapes, and undermining rural economies built around access to intact public lands.

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.² 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. The Public Land Rule is essential to maintaining healthy, runnable landscapes and sustaining rural recreation economies.

Public Land Rule Sustains Healthy Landscapes and Thriving Recreation Economies

Outdoor recreation contributes approximately \$1.1 trillion annually to the U.S. economy and supports over five million jobs, according to the U.S. Bureau of Economic Analysis.³ Running is among the most widely practiced and accessible forms of recreation, with more than 60 million participants nationwide and thousands of organized trail events that rely on BLM lands each

¹ 43 U.S.C. §§ 1701–1787.

² Runners for Public Lands, *About Us*, <https://www.runnersforpubliclands.org/about> (last visited Sept. 10, 2025).

³ U.S. Bureau of Econ. Analysis, *Outdoor Recreation Satellite Account, U.S. and States, 2023* (Nov. 9, 2023), <https://www.bea.gov/news/2023/outdoor-recreation-satellite-account-us-and-states-2023>.

year. The BLM manages nearly 245 million acres across the West, encompassing many of the landscapes where runners train, explore, and compete—from short daily runs on local trails to multi-day endurance events that define regional recreation economies.

The Public Land Rule provides BLM with modern, science-based tools to manage these lands for ecological health, scenic quality, and public enjoyment, consistent with the Federal Land Policy and Management Act (FLPMA). FLPMA directs the agency to protect “scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values” alongside other uses.⁴ The Public Land Rule operationalizes that mandate through landscape health assessments, restoration leases, and intactness metrics that prevent degradation before it limits public access or damages recreation resources that drive local economies.

For individual runners, the Public Land Rule matters because it safeguards the landscapes that make running safe, inspiring, and restorative. Trail runners experience the terrain directly: they depend on clear air, stable soils, intact vegetation, and predictable seasonal conditions. Wildfire smoke, ozone exposure, and post-fire erosion increasingly limit safe training days. Extreme heat, flooding, and trail washouts—conditions worsened by landscape degradation—already disrupt recreation across the West. By promoting resilient soils, connected habitats, and pre-emptive restoration, the Public Land Rule keeps trails runnable and public lands open for everyday use. For permitted trail race directors, the Public Land Rule underpins the long-term viability of events that anchor many rural economies and helps BLM field offices plan ahead—protecting the landscapes that sustain event routes and ensuring consistent standards for resource protection, sanitation, and safety. Stable management keeps race calendars predictable and reduces conflicts that otherwise delay or jeopardize permits.

Healthy landscapes are an important economic asset. Intact desert soils and alpine meadows retain moisture, store carbon, and resist erosion—factors that reduce costly post-storm repairs and trail closures. When those systems fail, individual runners lose access to safe recreation, and race directors face course disruptions that can take years to remedy. The Public Land Rule helps BLM anticipate and mitigate those risks by integrating restoration funding and land health data directly into planning decisions.

Bureau of Land Management field capacity, predictable permitting, and climate resilience are critical to keeping outdoor recreation viable. The Public Land Rule advances all three priorities, giving BLM field offices a consistent, science-based framework that benefits both casual runners seeking clean air and open trails, and professional race organizers striving to maintain safe, environmentally responsible events.

Rescission Favors Extraction Over Recreation Sustainability

If the Public Land Rule were rescinded, decisions would again tilt toward short-term industrial uses that fragment trail systems, increase erosion, and reduce the quality and safety of outdoor experiences. For everyday runners, this would mean more dust and degraded air quality on

⁴ 43 U.S.C. § 1701(a)(8) (directing the Secretary of the Interior to manage public lands in a manner that protects “scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values” alongside other uses).

favorite routes, fewer days when conditions are safe for vigorous activity, and increased safety risks on damaged or poorly maintained trails.

For event organizers, rescission would reintroduce regulatory uncertainty and eliminate the planning tools that make responsible, large-scale events possible. The loss of intactness metrics and restoration authority would leave BLM field offices to handle conflicts case-by-case—an inefficient, reactive approach that undercuts consistency. As a result, race directors would face greater difficulty securing routes, managing participant safety, and scheduling events around environmental conditions. These inefficiencies ripple through local economies that depend on predictable visitation and dependable recreation access.

Case Studies: Trail Running and Event Management on BLM Lands

The following examples illustrate how the Public Land Rule benefits both individual trail runners and race organizers who depend on healthy, well-managed BLM landscapes. Across the West, these case studies demonstrate how consistent, science-based planning supports safe daily recreation, reliable event operations, and sustainable local economies

Utah – Behind the Rocks Ultra, Moab Trail Marathon, and Other SRP-Permitted Events (Moab Field Office)

The Moab Field Office manages roughly 1.8 million acres of public land encompassing some of the most recognized desert running terrain in the country. Events like the Behind the Rocks Ultra and the Moab Trail Marathon use routes through the Pritchett Canyon, Amasa Back, and Kane Creek trail systems, traversing slickrock, sandstone cliffs, and desert drainages. These areas feature fragile biological soil crusts and shallow desert vegetation that require careful management to prevent erosion and maintain trail stability.

The Public Land Rule reinforces Moab’s recreation framework by grounding permit conditions in measurable landscape-health standards. It enables the BLM to monitor soil disturbance, control dust generation, and maintain the visual and ecological integrity of the canyons and mesas that define the region’s recreation identity. For individual runners, this ensures that iconic slickrock routes remain safe, scenic, and accessible. For race organizers, it provides clear, science-based guidance for staging events in sensitive terrain while minimizing restoration needs and user conflicts. Without these conservation guardrails, incremental surface disturbance from increased use or development would erode trail continuity and the qualities that make Moab’s trail network world-renowned.

Arizona – Black Canyon Ultras (Phoenix District, Black Canyon National Recreation Trail)

The Black Canyon Ultras 100K and 50K races follow the Black Canyon National Recreation Trail, a 78-mile corridor that connects the Bradshaw Mountains north of Phoenix with the Sonoran Desert near the Agua Fria River. The route winds through bajadas of saguaros and cholla, past seasonal washes and volcanic ridges that exemplify the ecological diversity of central Arizona. The BLM and state partners co-manage these lands, where trail durability and resource protection are critical to sustaining both casual recreation and large endurance events.

The Public Land Rule supports this balance by giving BLM the tools to maintain intact desert vegetation, prevent off-trail impacts, and protect riparian crossings that sustain wildlife and scenic quality. For runners, the Public Land Rule ensures a continuous, natural trail environment with stable soils and clean air, even as visitation grows. For race directors, it offers a transparent, predictable permitting framework based on land-health data and restoration planning. This consistency allows organizers to prepare routes, manage aid stations, and coordinate with local communities with fewer disruptions. By maintaining landscape integrity, the Rule ensures the Black Canyon Trail remains a premier example of how long-distance trail running and conservation can coexist sustainably.

Western Colorado – Desert RATS Trail Running Festival by UTMB (McInnis Canyons National Conservation Area)

The Desert RATS Trail Running Festival takes place near Fruita, Colorado, across the Kokopelli and Mack Ridge trail systems within and adjacent to the McInnis Canyons National Conservation Area (NCA). These trails cross Entrada sandstone mesas overlooking the Colorado River, offering runners expansive views of redrock canyons, juniper woodlands, and desert grasslands. The BLM's Grand Junction Field Office manages these routes to balance recreation use with protection of soils, vegetation, and visual quality.

Through the Public Land Rule, BLM applies measurable criteria for trail durability, erosion control, and scenic preservation. For individual runners, this translates to stable, well-maintained surfaces, intact vegetation buffers, and reduced sedimentation that help preserve the natural quiet of the high desert. For race directors, it provides a consistent environmental and permitting framework that minimizes uncertainty, allowing multi-day events to proceed safely and responsibly. The Rule's restoration tools also enable proactive management—repairing degraded areas and ensuring trails remain functional even after high-use periods or severe storms. The Desert RATS festival illustrates how the Public Land Rule fosters collaboration between BLM, organizers, and local businesses. By integrating recreation management with conservation objectives, it supports both a sustainable event and the tourism economy that depends on Fruita's trail-based identity.

New Mexico – Deadman Peaks Trail Run (Rio Puerco Field Office, Continental Divide Trail Corridor)

The Deadman Peaks Trail Run follows a remote stretch of the Continental Divide Trail (CDT) across BLM-managed lands near Cuba, New Mexico, within the Rio Puerco Field Office. The course traverses multicolored badlands, rolling sandstone mesas, and high desert ridgelines that define the region's distinctive geology. Runners experience wide-open vistas framed by distant volcanic peaks and traverse terrain where stable soils, minimal disturbance, and careful trail maintenance are essential to safety and sustainability.

The Public Land Rule strengthens BLM's ability to protect this corridor's natural integrity through its focus on connected landscapes, restoration planning, and land-health monitoring. For individual runners, it ensures a continuous and safe route across one of the CDT's most isolated sections, preserving the sense of solitude and immersion that defines the event. For race

organizers, it provides consistency across federal lands by standardizing permitting expectations, resource assessments, and post-event restoration requirements.

This framework reduces reroutes, protects fragile soils and drainages, and fosters coordination with local partners for trail upkeep. The Deadman Peaks Trail Run demonstrates how the Rule's science-based management approach supports both high-quality recreation and responsible event planning, sustaining the CDT corridor as an asset for rural tourism and year-round outdoor access.

California – Bishop High Sierra Ultra and High Desert 50K (Bishop Field Office)

The Bishop Field Office manages vast high-desert plateaus and volcanic tablelands along the eastern flank of the Sierra Nevada, landscapes characterized by sagebrush flats, basalt cliffs, and seasonal alpine runoff. These areas host events such as the Bishop High Sierra Ultra and the High Desert 50K, which draw runners seeking high-elevation races with views of the Owens Valley and the White Mountains. The fragile soils and open exposure typical of this terrain require thoughtful management to sustain recreation while protecting sensitive natural resources. The Public Land Rule enhances that management by supporting restoration leases, erosion control, and dust mitigation to preserve air quality and trail stability. For individual runners, this means cleaner air, resilient trail surfaces, and consistent access to desert and foothill routes connecting to U.S. Forest Service trailheads. For race directors, the Rule provides a predictable, conservation-based permitting process that helps maintain course integrity, ensure safety, and reduce the need for unplanned race course reroutes.

By integrating recreation with land-health objectives, the Rule allows the Bishop Field Office to protect desert ecosystems while sustaining events that are central to Inyo County's outdoor recreation economy. This balance benefits both residents and visitors who rely on the area's public lands for running, training, and community branding related to recreation economic development.

Oregon – Smith Rock Ascent and Oregon Trail Runs Series (Prineville District)

The Smith Rock Ascent and Oregon Trail Runs Series take place on BLM-managed lands surrounding Smith Rock State Park and the Crooked River Canyon, part of the Prineville District. The area's volcanic cliffs, rimrock mesas, and winding river canyons offer a blend of high-desert terrain and riparian environments that draw both casual runners and competitive athletes. These routes—linking trails such as Gray Butte, Homestead, and Misery Ridge connectors—require careful management to sustain visitation while preserving sensitive slopes and wildlife habitat.

The Public Land Rule provides the structure for integrated recreation and watershed management that keeps these trails durable and ecologically sound. Its land-health standards guide erosion monitoring, vegetation recovery, and noise management near sensitive habitats. For individual runners, this ensures dependable trail conditions, reduced dust, and protected scenic values. For race organizers, the Rule offers consistency and transparency in permitting, allowing events to align with seasonal closures or habitat protections while minimizing logistical uncertainty.

Without the Rule’s integrated framework, BLM field offices would face greater difficulty balancing intensive visitation with conservation goals. The Smith Rock and Crooked River landscape shows how the Public Land Rule enables sustainable recreation by maintaining trail systems that support both daily public use and organized events—key components of Central Oregon’s thriving outdoor recreation economy.

Together, these examples show that when BLM applies the Public Land Rule’s conservation and restoration tools, both everyday runners and event directors benefit from stable, predictable, and resilient public landscapes. The Rule ensures that iconic running destinations remain accessible, scenic, and economically valuable for the communities that depend on them.

Public Land Rule Recreation Grounds Recreation Permitting Through Data-Driven, Landscape-Health Management Standards

The Special Recreation Permit program forms the backbone of organized recreation management on Bureau of Land Management lands, providing the structure through which races, guided outings, and community events take place. The Public Land Rule strengthens this system by anchoring SRP decisions within a clear, science-based framework focused on landscape health and conservation. For individual runners, this means consistent access to clean air, safe and well-maintained trails, and landscapes managed to prevent overuse and degradation. For race directors, it establishes transparent permitting standards, predictable timelines, and decisions grounded in measurable environmental data rather than discretionary or inconsistent criteria.

By connecting the SRP process to the Rule’s landscape-health standards, BLM can better coordinate recreation use with resource protection, ensuring that events are planned around soil stability, wildlife sensitivity, and restoration priorities. When permit stipulations—such as group size limits, course marking, or seasonal restrictions—are informed by ecological metrics, field staff can make defensible, efficient decisions that protect resources while supporting recreation access. This consistency benefits both runners, who depend on reliable trail conditions, and event organizers, who rely on timely approvals and clear expectations.

The Rule also advances a more data-driven approach to recreation planning. Integrating GIS mapping of trail corridors, restoration zones, and intact landscape areas allows field offices to identify where high-use routes intersect with sensitive habitats or erosion-prone soils. These tools enable proactive management—helping BLM schedule events, direct maintenance funds, and manage cumulative impacts across multiple recreation uses. As a result, runners experience well-kept trails and protected scenic values, while race directors gain confidence that their events will proceed under stable, evidence-based policies.

Without the Public Land Rule, the SRP system would lose this stability and foresight. Field offices would be forced to revert to case-by-case mitigation, reactive decision-making, and inconsistent permit conditions. The outcome would be a less reliable process for organizers and reduced confidence among runners that their favorite trails will remain healthy and accessible. The Rule transforms recreation permitting from a transactional process into a tool for stewardship—one that ensures running events and everyday recreation can coexist sustainably with the landscapes that make them possible.

Conclusion

The Public Land Rule is a pragmatic, lawful, and science-based policy that strengthens the Bureau of Land Management's ability to balance conservation, recreation, and economic opportunity. For trail runners, race directors, and the communities that host them, it represents the difference between reactive management and resilient stewardship.

Rescinding the Rule would reverse progress toward predictable, climate-ready recreation management at a time when public demand and environmental pressures are both rising. Retaining the Rule ensures that runners can continue to experience healthy, connected landscapes while supporting sustainable rural economies and the next generation of public-lands stewards.

Trail running depends on intact, quiet, and healthy public lands. The Public Land Rule provides the planning and restoration architecture that keeps those landscapes runnable—and keeps rural economies resilient. If BLM rescinds the Rule, the foreseeable result is more fragmentation, more event cancellations, less community revenue, and diminished confidence that America's public lands are managed for the public's long-term benefit. For these reasons, Runners for Public Lands urges the BLM to withdraw the proposed rescission and continue implementing the Public Land Rule to secure durable, climate-ready access for present and future generations.

Runners for Public Lands respectfully urges the Department of the Interior to withdraw the proposed rescission and retain the Public Land Rule in full effect.

Sincerely,



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.