RUNNERS FOR PUBLIC LANDS

October 2, 2026

Director
Ecosystem Management Coordination
U.S. Department of Agriculture, Forest Service
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124

RE: Runners for Public Lands Comments Supporting Alternative 1 (No Action), 2001 Roadless Area Conservation Rule Rescission DEIS; Docket FS-2025-0001; RIN 0596-AD66

Dear USDA Forest Service Officials:

Runners for Public Lands (RPL) submits these comments on behalf of runners who use National Forest System trails and backcountry landscapes, as well as race directors who organize permitted trail-running events on those lands. RPL strongly supports Alternative 1, No Action, and urges USDA to retain the 2001 Roadless Area Conservation Rule. The DEIS does not demonstrate a need for nationwide rescission. The existing Rule already provides flexibility for specified management needs, while USDA's own analysis shows that rescission would have substantially greater effects on nonmotorized recreation and the roadless settings on which runners and race directors depend.

RPL's interest is both conservation-based and practical. Runners value long, connected, quiet landscapes where routes can pass through mountains, forests, and watersheds without repeatedly encountering roads or industrial disturbance. Race directors rely on those same qualities when developing courses, securing permits, coordinating volunteers and aid stations, planning for safety, and building relationships with local communities. Host communities, in turn, benefit from the repeat visitation that established races and high-quality running landscapes generate. These are among the reliance interests USDA expressly asked commenters to identify,[1] and they should be considered in the final EIS and any final rule. That analysis should account for the importance of stable routes and landscape character, rather than treating recreation simply as acreage affected or assuming that runners and events displaced from one landscape can readily move elsewhere.

The DEIS's recreation analysis points clearly toward Alternative 1. USDA finds that Alternative 1 best preserves opportunities for quiet, remote, and self-reliant recreation, while Alternative 2 would have the greatest effects on recreation settings and scenery and could affect approximately 12 million more nonmotorized acres than Alternative 3.[2] Those are precisely the recreation values at stake for RPL's members and constituents, and they weigh strongly in favor of retaining the Roadless Rule.

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[1] Special Areas; Roadless Area Conservation, 91 Fed. Reg. 53,827, 53,830 (Aug. 20, 2026) [hereinafter Proposed Rule]. https://www.federalregister.gov/d/2026-16965.

[2] U.S. Forest Serv., 2001 Roadless Area Conservation Rule Rescission: Draft Environmental Impact Statement 192–93 (Aug. 2026) [hereinafter DEIS], https://www.fs.usda.gov/managing-land/planning/roadless.

A. The Roadless Rule protects runnable landscapes, not just "roadless acreage."

The 2001 Roadless Rule currently governs approximately 44.7 million acres of National Forest System land outside the separate Idaho and Colorado roadless rules, including approximately 9.3 million acres in the Tongass National Forest.[3] Its central function is to limit most road construction, road reconstruction, and timber harvest while preserving defined exceptions for specified management needs.[4]

For runners, the value of that framework is experienced at trail scale. A long-distance route is shaped by what lies between trailheads: natural quiet, continuous singletrack, intact drainages, scenery, wildlife habitat, and the absence of recurring road crossings, haul traffic, or industrial activity. The DEIS recognizes these very values when it describes primitive, semi-primitive, and nonmotorized recreation settings and identifies "quiet, remote and self-reliant recreation" as a benefit best preserved by Alternative 1.[5]

That landscape character is particularly important because roadless lands can provide wild backcountry settings without being designated Wilderness. For race directors, that distinction matters. Organized fee-based recreation events on National Forest System lands are special uses that generally require Forest Service authorization.[6] By contrast, the Wilderness Act limits commercial enterprise and installations in designated Wilderness and creates a distinct statutory management regime.[7] For runners and race directors, IRAs can therefore occupy an important middle ground: they can retain the undeveloped character associated with wild backcountry recreation while remaining available, where otherwise appropriate under applicable law and Forest Service permitting requirements, for organized events and other managed recreation uses.

B. Race directors and host communities have built concrete reliance interests around stable public-land settings.

The proposed rule asks for information about reliance interests under the current Roadless Rule.[8] RPL urges the Forest Service to look beyond conventional notions of regulated-industry reliance. Race directors are permittees. They invest time and money in recurring courses, permit relationships, volunteer networks, communications systems, medical and rescue planning, equipment caches, transportation arrangements, and public expectations. Many events also contribute to trail stewardship and build long-term relationships with Forest Service staff and local communities.

Those investments depend on route stability and landscape character. A race may remain legally possible after a timber project or road construction, yet be materially changed because the course is rerouted, quiet backcountry becomes roaded, aid-station or crew logistics change, crossings

[3] Id. at 1–3; Proposed Rule, supra note 1, at 53,829.
[4] Special Areas; Roadless Area Conservation, 66 Fed. Reg. 3,244, 3,272–73 (Jan. 12, 2001), https://www.govinfo.gov/content/pkg/FR-2001-01-12/pdf/01-726.pdf.
[5] DEIS, supra note 2, at 163–93.
[6] 36 C.F.R. §§ 251.50(a), (d)(1), 251.51 (2026), https://www.ecfr.gov/current/title-36/chapter-II/part-251/subpart-B/section-251.50; https://www.ecfr.gov/current/title-36/chapter-II/part-251/subpart-B/section-251.51.
[7] Wilderness Act § 4(c), 16 U.S.C. § 1133(c), https://www.law.cornell.edu/uscode/text/16/1133.
[8] Proposed Rule, supra note 1, at 53,830.

become more complicated, scenic continuity is lost, or the event's defining identity is diminished. The effect can extend well beyond race day. Participants return to train, families stay in local lodging, volunteers travel to the community, and events become part of local branding. The Supreme Court has held that an agency changing policy must consider serious reliance interests generated by the prior policy.[9] The requirement is especially relevant here because USDA is proposing to remove a national framework that has been in place for roughly a quarter century. The Forest Service may choose a different approach, but it must acknowledge the permit, event, stewardship, community, and recreation systems that have developed while the Roadless Rule provided a stable landscape baseline.

The final EIS should therefore expressly evaluate these recreation-sector reliance interests, including the extent to which recurring permitted events, established routes, trail-stewardship partnerships, and gateway-community visitation have developed in reliance on the landscape conditions maintained under the Roadless Rule. If USDA nevertheless selects an action alternative, the agency should explain how it weighed those reliance interests against the asserted benefits of rescission.

C. USDA's own recreation and economic analysis favors Alternative 1.

The DEIS's recreation findings are unusually clear. Alternative 1 retains the most unroaded and quiet recreation opportunities. Alternative 2 has the greatest potential impact on recreation settings and scenery. Where future roads or timber activities occur, USDA anticipates noise, visible infrastructure, temporary closures, possible shifts toward more developed settings, reduced quiet/remote opportunities, and increased user conflict.[10] Alternative 3 would have similar kinds of effects, but across a smaller area, and the DEIS estimates that Alternative 2 could affect approximately 12 million more nonmotorized acres.[11]

USDA's economic analysis also identifies substantial existing recreation use and economic value associated with affected IRAs. The agency estimates approximately $886 million in annual visitor spending associated with affected IRAs.[12] It estimates up to approximately $1.5 billion in annual economic benefit for trail-based and dispersed recreation within the affected IRAs and another approximately $419 million for fishing, hunting, and wildlife viewing.[13] USDA further estimates possible annual recreation-benefit losses of up to $6.1 million and passive-use losses of $5.3 to $11.5 million under the proposed rule.[14]

The small-entity analysis itself estimates a possible $9 million annual loss in recreation-related expenditures in communities around roadless areas under its assumptions, including

[9] Dep't of Homeland Sec. v. Regents of the Univ. of Cal., 591 U.S. 1, 30–33 (2020), https://www.supremecourt.gov/opinions/19pdf/18-587_5ifl.pdf; FCC v. Fox Television Stations, Inc., 556 U.S. 502, 515–16 (2009), https://tile.loc.gov/storage-services/service/ll/usrep/usrep556/usrep556502/usrep556502.pdf.
[10] DEIS, supra note 2, at 192–93.
[11] Id. at 192.
[12] U.S. Forest Serv., Cost Benefit Analysis and Consideration of Impacts on Small Entities 16–17 (Aug. 2026) [hereinafter CBA], https://www.fs.usda.gov/managing-land/planning/roadless.
[13] Id. at 17.
[14] Id. at 5, 25–30.

approximately $7 million associated with trail-based and dispersed recreation.[15] USDA characterizes those amounts as transfers rather than social costs in the CBA, but that accounting convention does not erase the distributional effect on particular gateway communities or small businesses that lose visitation. A dollar shifted from one destination to another may be neutral in a national accounting table while remaining consequential to a rural community built around a particular race, trail system, or public-land destination.

The final EIS should disclose these distributional effects rather than relying solely on national aggregate measures. For recreation-dependent communities, the relevant question is not simply whether visitor spending occurs somewhere else, but whether rescission could shift visitation and economic activity away from particular communities whose recreation economies are tied to nearby roadless landscapes.

D. The asserted wildfire-management need does not justify nationwide rescission.

RPL supports targeted fuels reduction, prescribed fire, and community protection where the science and local conditions warrant those actions. The Roadless Rule already accommodates meaningful fire management. Under the operative 2001 provisions, a road may be constructed or reconstructed when needed to protect public health and safety from an imminent threat of fire or another catastrophic event that would otherwise cause loss of life or property.[16] The Rule also allows qualifying generally small-diameter timber cutting or removal to maintain or restore ecosystem composition and structure, expressly including treatment to reduce the risk of uncharacteristic wildfire effects, where roadless characteristics are maintained or improved.[17]

The current Rule therefore does not categorically prohibit vegetation management or wildfire-risk reduction in IRAs; rather, it establishes substantive limits and conditions governing when road construction, reconstruction, and timber cutting may occur. It does limit construction of new roads for some non-emergency mechanical projects when no separate road exception applies. That is a real constraint, but the question in this rulemaking is whether that constraint warrants removing the national standard from 44.7 million acres.

The DEIS does not establish that removing roadless protections would, on balance, reduce wildfire risk.[18] Roads can improve access for some vegetation treatments and suppression activities, but they can also increase human-caused ignitions. USDA itself acknowledges this relationship, and Forest Service research has found that roaded and roadless forests burned at comparable rates over the study period, with some of the suppression advantages associated with roads offset by increased human ignition exposure. Thus, while additional roads may facilitate particular treatments or suppression tactics, the record does not support treating more roads as an inherently effective means of reducing wildfire risk.

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[15] Id. at 35–36.
[16] 66 Fed. Reg. at 3,272–73 (former 36 C.F.R. § 294.12(b)(1) (2001), judicially reinstated).
[17] Id. at 3,273 (former 36 C.F.R. § 294.13(b)(1)(ii) (2001)).
[18] DEIS, supra note 2, at 84–105; Proposed Rule, supra note 1, at 53,829; Sean P. Healey, *Long-Term Forest Health Implications of Roadlessness*, 15 Env't Rsch. Letters 104023 (2020), https://research.fs.usda.gov/treesearch/61251.

Alternative 3 provides a geographically narrower approach to the additional management flexibility identified by USDA. USDA designed it to remove restrictions within the WUI and near existing roads while retaining Roadless Rule protection in more remote core areas.[19] RPL does not support Alternative 3 because it would still remove protections across a very large landscape and would fully exempt the Tongass. But Alternative 3 demonstrates that the agency can target the areas where it believes additional access or treatment flexibility is most important. USDA has not shown why community wildfire protection requires removing national safeguards from remote running landscapes far from the WUI and existing roads.

At minimum, the existence of Alternative 3 demonstrates that reasonable alternatives exist between retaining the Rule unchanged and eliminating it nationwide. If USDA concludes that the existing Rule materially constrains priority wildfire treatments in particular geographic settings, the final EIS should explain why a geographically or substantively targeted modification would not meet that asserted need with substantially less impact on roadless recreation values.

E. Additional Road Construction Would Create Additional Fiscal and Management Obligations.

Expanding opportunities for road construction is particularly difficult to justify when the Forest Service already lacks the resources to adequately maintain its existing road system. The agency estimates a $6.9 billion deferred-maintenance backlog for passenger-car roads and bridges, a figure that does not capture all lower-maintenance-level roads.[20] Less than 20 percent of paved and gravel passenger-car roads are reported in good condition, and annual appropriations for road-system capital improvement and maintenance have declined sharply over the last two decades.[21]

The CBA estimates that native-surface road construction in the lower 48 may cost approximately $80,000 to $100,000 per mile before added surfacing, structures, and other expenses; Alaska costs can be several times higher. Annual road maintenance can range from approximately $5,000 to $50,000 per mile depending on location and treatment.[22] The DEIS further notes that permanent roads in IRAs may be unusually costly because they tend to occur in steep, remote terrain.[23]

Those costs matter to runners and race directors because agency budgets are finite. New permanent road obligations can compete with trail maintenance, visitor services, permit administration, restoration, and other recreation needs. RPL therefore questions a policy that would increase road opportunity while the agency's own analysis demonstrates a substantial existing maintenance deficit.

Before selecting an action alternative, USDA should disclose how reasonably foreseeable new road construction and reconstruction would be funded and maintained, whether those obligations

[19] DEIS, supra note 2, at 15–18 & app. 1 tbl. 55.
[20] CBA, supra note 12, at 18; DEIS, supra note 2, at 44–47.
[21] DEIS, supra note 2, at 40–44.
[22] CBA, supra note 12, at 27–28.
[23] DEIS, supra note 2, at 47.

could increase the existing deferred-maintenance burden, and whether additional road obligations could divert limited Forest Service capacity from trails, recreation infrastructure, restoration, and special-use administration.

F. Four race landscapes demonstrate why the national baseline matters.

These examples demonstrate how runners, race directors, and host communities have developed substantial reliance interests around the stable landscape conditions protected by the Roadless Rule. Over decades, established race courses, recurring permits, trail-stewardship partnerships, volunteer and safety systems, and local recreation economies have become closely tied to these landscapes and their undeveloped character. USDA should account for these established relationships and investments when evaluating the consequences of removing the national roadless baseline.

Western States Trail / Tahoe National Forest

The Western States Endurance Run is one of the country's defining trail-running events. Its course traverses a long National Forest System landscape, including extensive mileage on the Tahoe National Forest.[24] Official roadless maps for the Tahoe and Eldorado National Forests show multiple IRAs in the broader corridor.[25] The Forest Service has itself recognized the community importance of annual endurance events using portions of the Western States Trail.[26] For a race of this scale and history, reliance extends far beyond the permit document. Course knowledge is accumulated over decades. Aid stations, communications, volunteer assignments, medical planning, participant expectations, community identity, and training culture become tied to the route and its setting. Where future road construction, reconstruction, or timber activity affects the route or its surrounding recreation setting, the consequence need not be cancellation of the event to impose a real recreation or operational cost. It can alter what makes the race distinct and shift operational burdens onto organizers and volunteers. Placer County's tourism economy also benefits from recreation-oriented visitation.[27] Alternative 1 would retain the regulatory framework under which that relationship has developed.

Bighorn Trail Run / Bighorn National Forest

The Bighorn Trail Run uses the Bighorn National Forest and is associated with recurring Forest Service recreation-event permitting.[28] The forest contains substantial inventoried roadless

[24] Western States Endurance Run, Course Description, https://www.wser.org/course-description/; U.S. Forest Serv., Western States Trail, https://www.fs.usda.gov/r05/tahoe/recreation/trails/western-states-trail.
[25] U.S. Forest Serv., Tahoe National Forest, Map of Inventoried Roadless Areas, https://www.fs.usda.gov/sites/default/files/roadless-map-inventoried-areas-california-tahoe-fsmrs-072591.pdf; U.S. Forest Serv., Eldorado National Forest, Map of Inventoried Roadless Areas, https://www.fs.usda.gov/sites/default/files/roadless-map-inventoried-areas-california-eldorado-fsmrs-072319.pdf.
[26] U.S. Forest Serv., Biggie Vegetation Management and Fuels Reduction Project Environmental Assessment 148–49, https://www.fs.usda.gov/emc/nepa/revisions/includes/docs/restoration/proposedces/biggievegetation-ea.pdf.
[27] Placer County, Memorandum re Economic Development 2 (July 12, 2022), https://www.placer.ca.gov/DocumentCenter/View/62211/02A.
[28] U.S. Forest Serv., Recreation Event Special Use Permit Reissues, Bighorn National Forest, https://www.fs.usda.gov/r02/bighorn/projects/archive/53434; Bighorn Trail Run, 100 Mile Course, https://bighorntrailrun.com/100-mile.

acreage.[29] The race's identity depends on remote singletrack, high ridges, canyon terrain, and sustained separation from developed settings. Sheridan County tourism organizations describe tourism and events as important to local economic vitality and work directly with event organizers.[30] This is precisely the kind of reciprocal reliance USDA should recognize: the race depends on intact landscape character, and local businesses and communities benefit from the race's ability to draw participants and supporters to that landscape. Removing the Roadless Rule would not itself alter the Bighorn course, but it would remove one component of the regulatory baseline that has helped maintain the undeveloped setting on which this type of event depends. That loss of regulatory stability is itself relevant to USDA's consideration of recreation and reliance interests.

Jemez Mountain Trail Runs / Santa Fe National Forest

The Jemez Mountain Trail Runs are closely tied to the mountain landscape around Los Alamos and the Santa Fe National Forest.[31] Forest Service mapping and planning identify substantial IRA acreage in the Jemez landscape.[32] Los Alamos County tourism and economic-development planning likewise treats outdoor recreation and visitation as local economic assets.[33] The event therefore illustrates why a purely national accounting of displaced recreation is incomplete. If runners shift to another destination after a material change in recreation setting or landscape character, national economic accounting may characterize much of the resulting spending as transferred rather than lost. That does not mean the effect is immaterial: Los Alamos-area businesses, event organizers, and the local recreation economy could still bear the loss. The final EIS should therefore evaluate the geographic distribution of recreation effects, not merely their treatment in national aggregate economic accounting.

Wasatch Front 100 / Uinta-Wasatch-Cache National Forest

The Wasatch Front 100 is a long-established event in the central Wasatch Mountains, and Forest Service project records identify the race as a special-use matter.[34] The broader Uinta-Wasatch-Cache landscape contains extensive IRA acreage documented in Forest Service roadless

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[29] U.S. Forest Serv., *Bighorn National Forest: Inventoried Roadless Areas* (Sept. 15, 2000), https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5057905.pdf.

[30] Sheridan County Travel & Tourism, Local Industry Update 1 (Jan. 2026), https://www.sheridanwyoming.org/wp-content/uploads/2026/01/2026-Q1-Winter-Industry-Update.pdf.

[31] Jemez Mountain Trail Runs, https://www.jemezmountaintrailruns.org/; Los Alamos County, Jemez Mountain Trail Run, https://www.losalamosnm.us/Events-Directory/Jemez-Mountain-Trail-Run.

[32] U.S. Forest Serv., Santa Fe National Forest, Map of Inventoried Roadless Areas, https://www.fs.usda.gov/sites/default/files/roadless-map-inventoried-areas-newmexico-santafe-fsmrs-072526.pdf; U.S. Forest Serv., Santa Fe National Forest Land Management Plan, https://www.fs.usda.gov/sites/nfs/files/legacy-media/santafe/Final%20Land%20Management%20Plan.pdf.

[33] Los Alamos County, Tourism Strategic Plan 5, https://www.losalamosnm.us/files/sharedassets/public/v/4/departments/economic-development/documents/lactourismstrategicplan.pdf; Los Alamos County, Economic Vitality Strategic Plan 13, https://www.losalamosnm.us/files/sharedassets/public/v/1/departments/community-development/documents/economic-vitality-strategic-plan-20190528.pdf.

[34] U.S. Forest Serv., Wasatch Front 100 Mile Endurance Run, https://www.fs.usda.gov/r04/uinta-wasatch-cache/projects/archive/49219; Wasatch 100, About, https://wasatch100.com/about/.

mapping and planning.[35] For independent runners, those lands provide training terrain and long backcountry routes close to major communities. For race directors, they provide the setting that gives an event its reputation. The Wasatch example also illustrates the importance of roadless landscapes near major population centers: these lands support not only permitted events but repeated training runs, informal long-distance routes, and everyday access to undeveloped backcountry settings. The recreation value at stake therefore extends beyond race-day participation or tourism spending.[36] Maintaining the national roadless baseline protects both recreational experience and the community value that has developed around it.

G. Project-level review is not a substitute for analyzing the programmatic loss now.

USDA emphasizes that rescission would not itself approve a road or timber sale and that future projects would remain subject to forest plans, NEPA, and other laws.[37] But the legal effect of rescission is to remove the national prohibition that currently constrains those later decisions. The removal of that programmatic constraint changes the regulatory baseline governing 44.7 million acres and is therefore part of the environmental change USDA must analyze at this stage, even though the location and design of individual future projects may remain uncertain.

NEPA requires analysis of a reasonable range of alternatives and reasonably foreseeable environmental effects.[38] USDA's current NEPA regulations likewise require an EIS to evaluate the proposed action and action alternatives sufficiently to support informed decisionmaking.[39] The Forest Service should not count future road access, treatment opportunity, or timber opportunity as benefits of rescission while deferring the corresponding recreation, watershed, scenery, and fragmentation costs to later projects. The analysis should apply a consistent level of forecasting to both sides of the ledger. To the extent USDA considers future roads, treatments, timber activity, or management flexibility sufficiently foreseeable to support the asserted benefits of an action alternative, it should evaluate the reasonably foreseeable environmental and recreation consequences associated with those same activities at a comparable level of generality.

The APA independently requires reasoned decisionmaking. An agency acts arbitrarily when it fails to consider an important aspect of the problem, and a policy reversal requires attention to serious reliance interests.[40] For RPL, those important aspects include the effects of removing the

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[35] U.S. Forest Serv., Wasatch-Cache National Forest, Map of Inventoried Roadless Areas, https://www.fs.usda.gov/sites/default/files/roadless-map-inventoried-areas-wyoming-wasatchcache-fsmrs-072627.pdf; U.S. Forest Serv., Uintah National Forest, Map of Inventoried Roadless Areas, https://www.fs.usda.gov/sites/default/files/roadless-map-inventoried-areas-utah-uintah-fsmrs-072606.pdf.
[36] Utah Div. of Outdoor Recreation, Utah Statewide Comprehensive Outdoor Recreation Plan 80 (2024), https://recreation.utah.gov/wp-content/uploads/TP_HOLDING_Utah-SCORP-Final-09262024-Web-Single-Page.pdf; Utah Off. of Tourism, Wasatch County Residents' Opinions on Tourism: Longitudinal Survey Results 2021–2022 22, 29–30 (May 2023), https://travel.utah.gov/wp-content/uploads/UOT-Wasatch-Area-Report-May2023.pdf.
[37] Proposed Rule, supra note 1, at 53,829; DEIS, supra note 2, at 18–21.
[38] 42 U.S.C. § 4332(2)(C)(i), (iii), https://www.law.cornell.edu/uscode/text/42/4332.
[39] 7 C.F.R. § 1b.7(h)(3)(i), (iv), (5)(i) (2026), https://www.ecfr.gov/current/title-7/subtitle-A/part-1b/section-1b.7.
[40] Motor Vehicle Mfrs. Ass'n of U.S., Inc. v. State Farm Mut. Auto. Ins. Co., 463 U.S. 29, 43 (1983), https://www.govinfo.gov/content/pkg/USREPORTS-463/pdf/USREPORTS-463-29.pdf; Regents, 591 U.S. at 30–

national baseline on recurring race permits and routes, event and volunteer systems, trail-stewardship relationships, independent running opportunities, recreation-dependent small businesses, and gateway communities. USDA should address those interests in its final analysis and explain how they were weighed in selecting the final alternative.

H. Alternative 1 Would Retain the Existing National Roadless Framework.

Alternative 1 does not freeze the landscape or prevent legitimate management. It retains a national conservation baseline while preserving defined exceptions for emergencies, specified road construction and reconstruction, and qualifying vegetation treatments. It also leaves the Forest Service's ordinary authorities over permits, trails, recreation, fire management, and land management intact. Retaining the Rule therefore does not require USDA to choose between roadless conservation and active management; it preserves the framework within which both have occurred for approximately twenty-five years.[41]

Alternative 2 would remove that baseline from all 44.7 million acres now governed by the current Rule. Alternative 3 would preserve more core roadless land than Alternative 2, but it would still withdraw protection across a very large area and would expose many running landscapes to additional uncertainty.[42] Neither action alternative is preferable to a framework that USDA's own DEIS finds provides the greatest protection for quiet, remote, self-reliant and nonmotorized recreation.

RPL therefore asks the Forest Service to select Alternative 1, No Action, and retain the 2001 Roadless Rule. If USDA nevertheless concludes that additional flexibility is necessary for particular wildfire, access, or community-protection needs, it should identify those specific constraints and evaluate a tailored response rather than eliminate the national safeguard across 44.7 million acres. At minimum, the final EIS and any final rule should expressly address the recreation reliance interests identified in these comments, the distributional consequences for recreation-dependent communities, the fiscal implications of additional road obligations, and the recreation consequences associated with the future activities USDA treats as benefits of rescission.

Thank you for the opportunity to comment.

Sincerely,

Kathleen Baker

Kathleen Baker
Executive Director
Runners for Public Lands

33; Organized Vill. of Kake v. U.S. Dep't of Agric., 795 F.3d 956, 966–69 (9th Cir. 2015) (en banc), https://law.justia.com/cases/federal/appellate-courts/ca9/11-35517/11-35517-2014-03-26.html.

[41] 66 Fed. Reg. at 3,272–73.

[42] DEIS, supra note 2, at 15–18, 192–93 & app. 1 tbl. 55.

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.