

December 1, 2025

Senator John Barrasso Chair, Subcommittee on Public Lands, Forests, and Mining Committee on Energy and Natural Resources Washington, D.C. 20510

Senator Catherine Cortez Masto Ranking Member, Subcommittee on Public Lands, Forests, and Mining Committee on Energy and Natural Resources Washington, D.C. 20510

Re: December 2nd Public Lands, Forests, and Mining Subcommittee Hearing to **Receive Testimony on Pending Legislation**

Chair Barrasso, Ranking Member Cortez Masto, and members of the Subcommittee:

On behalf of the human-powered outdoor recreation community, thank you for the opportunity to provide input on December 2nd's Subcommittee hearing on public lands, wildfire, and forestry legislation.

Outdoor Alliance is a coalition of nine member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, Colorado Mountain Club, and Surfrider Foundation and represents the interests of the millions of Americans who climb, paddle, mountain bike, backcountry ski and snowshoe, and enjoy coastal recreation on our nation's public lands, waters, and snowscapes.

Federal public lands and waters are home to America's best opportunities for outdoor recreation and provide countless environmental benefits. These lands and waters also form the foundation of America's outdoor recreation economy, which contributed \$1.2 trillion in gross economic output, comprised 2.3% of gross



















domestic product, and supported nearly 5 million jobs in 2023.1 Ensuring long-term protection and stewardship of these lands and waters is a high priority for the outdoor recreation community.

December 2nd's hearing includes more than two dozen bills that would address conservation and management of public lands and waters, including several bills focused particularly on wildfire and forest resilience. Outdoor Alliance supports the following bills, which would protect lands and waters with high recreational value and improve public land management to foster resilient landscapes and recreation opportunities:

- Roadless Area Conservation Act (S. 2042)
- Colorado Outdoor Recreation and Economy Act (S. 764)
- Oregon Recreation Enhancement Act (S. 888)
- Smith River National Recreation Area Expansion Act (S. 945)
- Pecos Watershed Protection Act (S. 1319)
- M.H. Dutch Salmon Greater Gila Wild and Scenic River Act (S. 1476)
- Wild Olympics Wilderness and Wild and Scenic Rivers Act (S. 1737)
- Cross-Boundary Wildfire Solutions Act (S. 2033)

We encourage the Subcommittee to advance these bills as part of a comprehensive public lands package during the current Congress.

Additionally, our community has concerns with how several other bills including S. 90, S. 1860, S. 902, and S. 2262, would affect outdoor recreation on public lands. These concerns, as well as our support for the list of bills above, are described in detail in the comments below.

Roadless Area Conservation Act (S. 2042)

Outdoor Alliance strongly supports the Roadless Area Conservation Act (RACA). This bill would codify the Forest Service's 2001 Roadless Area Conservation Rule,² to provide flexible, durable protections for more than 58 million acres of lands with

² Special Areas; Roadless Area Conservation, 66 Fed. Reg. 3244 (Jan. 12, 2001).

















¹ U.S. Bureau of Economic Analysis, BEA 24-53, Outdoor Recreation Satellite Account, U.S. and States, 2023 (2024).



high conservation and recreation value across the U.S. This legislation is urgently needed to provide permanent protections for roadless areas in light of the U.S. Department of Agriculture's current proposal to rescind the Rule outside of Colorado and Idaho.

Currently, the Roadless Rule protects more than 58 million acres of National Forests across the U.S. in a way that allows access for a wide variety of recreation opportunities, ranging from backpacking to motorized recreation. The Rule itself is both effective and straightforward. It generally prohibits roadbuilding in inventoried roadless areas (IRAs) with commonsense exceptions for public safety and existing rights, and places reasonable limits on logging that provide land managers with the flexibility needed to mitigate the risk of wildfire to both communities and ecosystems.

Our community values these areas for the opportunities they provide for climbing, hiking, mountain biking, paddling, and backcountry skiing. According to maps from Outdoor Alliance's GIS Lab, roadless areas protect more than 8,743 climbing routes and bouldering problems, 782 miles of whitewater paddling runs (in addition to critically important headwaters), 26,647 miles of trail, and 19,596 miles of mountain biking. Roadless areas are found in 42 states and Puerto Rico, and they are home to recreation gems like:

- Hiking, backcountry skiing, and mountain biking near Emerald Bay in Lake Tahoe;
- Alpine summits like Wyoming's Franc's Peak;
- Montana's Hyalite Canyon, a world-renowned ice climbing destination;
- Climbing and backcountry skiing at Washington Pass and Liberty Bell at the headwaters of Washington's Methow Valley;
- Popular day hikes including Graveyard Fields, Black Balsam Knob, and Sams Knob on North Carolina's Pisgah National Forest;
- Whitewater paddling on the Wild & Scenic Tuolumne River;
- Mountain biking on the Maah Daah Hey Trail in western North Dakota, Kettle Crest of Washington, and Tea Creek Mountain in West Virginia;
- Multi-pitch climbing at Cochise Stronghold in Arizona;
- Stellar hiking and camping adjacent to the Dolly Sods and Otter Creek Wilderness in West Virginia; and



















Endurance trail running on the Dog Canyon Trail on New Mexico's Lincoln National Forest.

The Roadless Rule's core limitation on road building protects a backcountry setting that many recreationists value and seek out. The undeveloped character of these areas enables recreationists to challenge themselves and escape the crowds that are more common to roaded, developed areas of National Forests. For recreational pursuits not permissible in designated Wilderness, like mountain biking, IRAs are often the best places to experience backcountry recreation. Rescinding the Roadless Rule would put these recreation opportunities at risk by removing an essential nationwide protection for backcountry areas of National Forests.

Outdoor recreation in IRAs also supports America's \$1.2 trillion outdoor recreation economy. IRAs are often highly scenic areas that contain popular backpacking loops, whitewater runs, multi-pitch climbing routes, and other recreation resources that visitors spend money and travel long distances to enjoy. These destination recreation areas often support local businesses such as guides and outfitters and are some of the primary places that technical outdoor gear is put to use.

S. 2042 would make permanent a fiscally responsible policy regarding the size of the USFS road system. The USFS manages more than 368,000 miles of roads,³ more than any other federal land management agency. Deferred maintenance needs for the USFS road system total more than \$5,980,000,000 and make up by far the largest share of the agency's immense deferred maintenance backlog.⁴ Considering the enormity of this backlog and the USFS's current work to reduce its overall fiscal footprint, taxpayer dollars are best spent maintaining existing roads and, where necessary, decommissioning unneeded roads, rather than on further expanding the road system into the most rugged and inaccessible areas of the National Forest System.

⁴ U.S. Forest Service, National Forest System Statistics, Fiscal Year 2024, FS-905 (Apr. 2025), https://www .fs.usda.gov/sites/default/files/fs_media/fs_document/FY24-forest-system-stats.pdf.



















³ U.S. Forest Service, Fiscal Year 2026 Budget Justification, Page 29a-87 (June 1, 2025), https://www.fs.usda.gov/sites/default/files/fs-fy26-congressional-budget-justification.pdf.



In its Notice of Intent (NOI), USDA cites concerns related to wildfire and forest health as justification for rescinding the Rule.⁵ As a stakeholder that is directly affected by extreme wildfires, the outdoor recreation community supports forest thinning, prescribed fire, community hardening, and other actions needed to address the wildfire crisis. We are generally sympathetic and open to policy changes that science or other expertise show are needed to increase wildfire resilience on public lands. However, in this instance, the USDA has not shown that a full rescission of the Roadless Rule is necessary—or even helpful— for achieving wildfire suppression, community protection, or landscape fire resilience objectives within and around IRAs, and the NOI fails to mention the well-established connection between roads and unwanted fire ignitions.

By their very nature, IRAs tend to be remote landscapes, generally far from communities, where wildfires are less likely to threaten life or property. Where fuels treatments and other wildfire mitigation work is needed in IRAs, the Roadless Rule already clearly allows for fuel reduction, including tree removal, necessary to reduce the risk of uncharacteristic wildfires. Indeed, the bipartisan Wildland Fire Mitigation and Management Commission's comprehensive report on wildfire solutions in 2023 does not mention the Roadless Rule, implying that it was not top-of-mind for Commission experts charged with improving wildfire policy.8

Wildfire science also does not identify the Roadless Rule as an impediment to effective wildfire management, and instead science shows significant drawbacks related to roads and fire. Most wildfires start along roads, and thus wildfire ignitions are significantly more common in roaded landscapes than in IRAs or Wilderness. Building additional roads in IRAs would increase the likelihood of unwanted ignitions during extreme fire conditions. Science also does not show

⁹ James D. Johnston et al., *Does conserving roadless wildland increase wildfire activity in western US* national forests?, 16 Environmental Research Letters 084040 (2021), https://doi.org/10.1088/1748-93 26/ac1/3ee.

















⁵ See, Special Areas; Roadless Area Conservation; National Forest System Lands, 90 Fed. Reg. 42,179 (Aug. 29, 2025);

⁶ See, Jamie Ervin, Wildfire and Outdoor Recreation in the West: How Recreationists Can Support a Fire-Resilient Future, Policy Report, Outdoor Alliance, Washington, D.C. (2023).

⁷ 36 CFR § 294.13(b).

⁸ Wildland Fire Mitigation and Management Commission, ON FIRE: The Report of the Wildland Fire Mitigation and Management Commission (2023).



increased fire severity within roadless areas. Instead, studies have found no significant difference between fire severity in roaded versus unroaded landscapes, 10 and have shown high severity fire to be more frequent within and adjacent to industrially-managed timberlands than on public lands. 11

In short, the Roadless Area Conservation Act would make permanent the Roadless Rule's protections for outstanding backcountry recreation opportunities across the country, while continuing to provide the USFS with the management flexibility needed to address wildfire and other land management concerns. We recommend that the Committee move swiftly to pass this important legislation.

Colorado Outdoor Recreation and Economy Act (S. 764)

Outdoor Alliance appreciates the thoughtful protections embodied in the CORE Act. In addition to its essential protections for conservation values, the bill also protects hundreds of miles of trails, scores of climbing sites, miles of whitewater paddling, and valued backcountry ski terrain. Although portions of the original CORE Act were protected in 2022 through the designation of Camp Hale National Monument, action is needed from Congress to permanently protect the remainder of the landscape, including the Thompson Divide, the San Juan Mountains, the Curecanti National Recreation Area, and new Wilderness areas along the Continental Divide.

All of the proposed designations in the CORE Act have been carefully vetted by recreation groups, and designations protect and enhance recreational opportunities like hiking, climbing, skiing, and mountain biking. The mineral withdrawals and resource protections in this bill further preserve the scenic and natural qualities of these landscapes.

We are particularly pleased to support legislation that designates Wilderness while also using other protective designations where more appropriate. This approach is essential, in particular, for protecting and enhancing mountain biking opportunities. Because of the collaborative approach employed in the bill's development, embracing input from local and national mountain biking stakeholders among

¹¹ Jacob I. Levine et al., Higher Incidence of High-Severity Fire in and Near Industrially Managed Forests, 20 Frontiers in Ecology & the Environment 397 (2022), https://doi.org/10.1002/fee.2499.

















¹⁰ *Id*.



others, the legislation enjoys broad support from the mountain biking community. This approach—embracing alternative designations where appropriate to protect both existing and prospective mountain biking opportunities—should be considered a model for other protective designation efforts around the country.









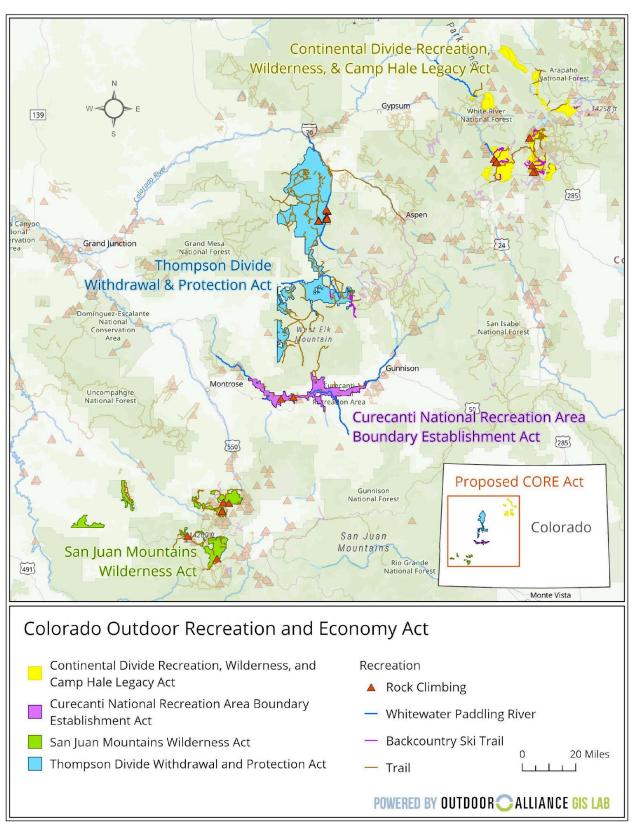








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Oregon Recreation Enhancement Act (S. 888)

Outdoor Alliance strongly supports the thoughtful protections that would be enacted by the Oregon Recreation Enhancement (ORE) Act. We are particularly pleased to support legislation that designates Wilderness while also using other protective designations where more appropriate. We are also supportive of language in the bill requiring the agencies to complete wildfire mitigation plans for new Recreation Areas, which will help facilitate ecologically appropriate fire management strategies for these important landscapes. This legislation would establish the following three designations:

Rogue Canyon Recreation Area

The bill establishes a 98,000 acre Recreation Area on lands administered by the Bureau of Land Management adjacent to the Wild Rogue Wilderness Area. This includes lands along the upper reaches of the Wild and Scenic corridor often enjoyed for day use near Galice, as well as lands along the Bear Camp Road. While existing roads would remain, no new permanent roads would be constructed, and new mining claims would be prohibited. Lands would be managed for purposes of protecting, conserving, and enhancing the unique and nationally important recreational, ecological, scenic, cultural, watershed, and fish and wildlife values.

Wild Rogue Wilderness Expansion

The bill expands the existing Wild Rogue Wilderness Area to approximately 60,000 acres. Although river runners and trail users experiencing the Wild and Scenic Rogue River enjoy a backcountry experience from Grave Creek to Foster Bar, the river is not protected as Wilderness until you pass through Mule Creek Canyon and enter the lower reaches of the river corridor administered by the Forest Service. This Wilderness expansion would protect the river corridor along the entire length of the section of the Rogue River experienced as a multi-day river trip.

Molalla Recreation Area



















The bill establishes a 30,000 acre Recreation Area on the banks of the Molalla River in Clackamas County adjacent to the Table Rock Wilderness Area. The Molalla River Trails System, a network of approximately 20 miles of trail, winds through forested foothills and offers scenic views of the Cascade Range for hikers, mountain bikers, and equestrians who visit. While the Molalla was designated as a Wild and Scenic River in March 2019, this designation would provide complementary protection to the lands along the river corridor and ensure that they are managed for purposes of protecting, conserving, and enhancing the unique and nationally important recreational, ecological, scenic, cultural, watershed, and fish and wildlife values.

Mineral Withdrawals

In addition to these protected areas, the ORE Act would protect more than 100,000 acres of federal lands along the headwater streams of Baldface Creek, Rough and Ready Creek, Hunter Creek, and Pistol River from new mining claims. These lands are located at the headwaters of rivers that include the Wild and Scenic North Fork Smith and Illinois Rivers, spectacular whitewater boating resources known for their exceptional water quality. While the Forest Service and Bureau of Land Management issued a 20-year administrative withdrawal from new mining claims in 2016, the legislation would make this protection permanent.









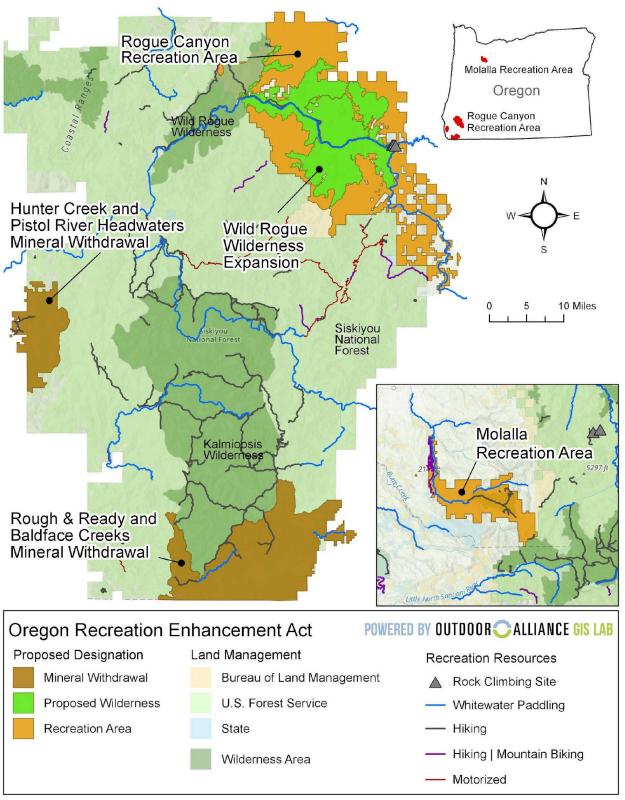








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Smith River National Recreation Area Expansion Act (S. 945)

Outdoor Alliance strongly supports the Smith River National Recreation Area Expansion Act. This important legislation would expand the Smith River National Recreation Area into southern Oregon and protect more than 75 miles of new Wild & Scenic Rivers, protecting invaluable outdoor recreation experiences in Oregon and downstream in California. The Smith River is the largest entirely free flowing river in California. Unfortunately, the Smith River National Recreation Area currently does not include the portion of the North Fork Smith in Oregon. Although relatively small in area, the bill protects the northern headwaters of the Smith River, which support a unique landscape, miles of spectacular rivers and streams, and priceless recreation opportunities.

Proximity to natural beauty and opportunities for outdoor recreation are tightly linked to increased desirability and economic development. The Smith River and its surroundings are already legendary in this regard, and the primary economic base for the region is its recreational opportunities, including fishing, hunting, whitewater paddling, cycling, hiking, backpacking, and surfing. Any damage done to the headwaters of the North Fork Smith has the potential to ripple down through all of these activities, causing significant harm to the region's economy. The legislation would protect the remaining 58,000 acres of North Fork Smith watershed, including at least 40 miles of hiking trails, a portion of the Kalmiopsis Wilderness, and 75 miles of river and tributaries, which will be designated Wild and Scenic Rivers. These extraordinary river segments include three premier wilderness whitewater paddling reaches totaling 35 miles of rugged, remote, beautiful water of the highest quality.









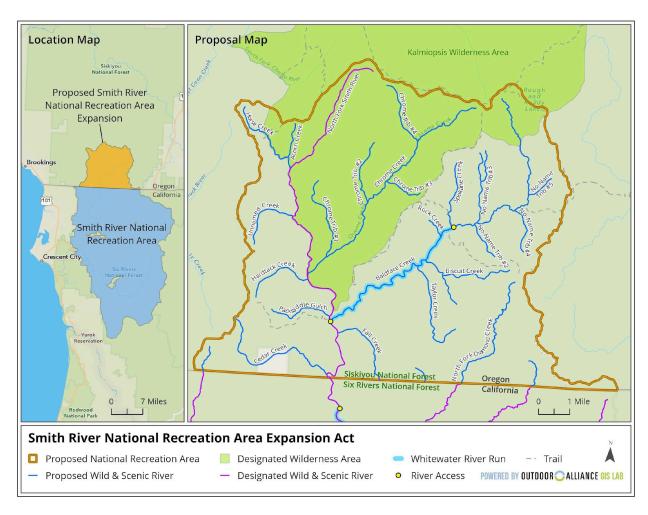












Pecos Watershed Protection Act (S. 1319)

Outdoor Alliance strongly supports the Pecos Watershed Protection Act, which would withdraw portions of the Upper Pecos Watershed from mineral development and also designate the Thompson Peak Wilderness Area. The Upper Pecos River provides numerous ecological and cultural values, as well as outstanding recreation opportunities including hiking, whitewater paddling, and climbing. The bill would protect whitewater resources between Cowles and Pecos, where the river flows through wooded high mountain canyons, barren tablelands with bluffs, and rugged rock formations. The proposed Wilderness would also protect portions of the Thompson Peak hiking trail. We especially appreciate that the proposed Wilderness boundaries would maintain access to the area's mountain biking resources, and we



















thank the bill sponsors for their work to incorporate input from mountain bikers and other recreationists into the bill's design.

M.H. Dutch Salmon Greater Gila Wild and Scenic River Act (S. 1476)

Outdoor Alliance strongly supports the M.H. Dutch Salmon Greater Gila Wild and Scenic River Act, which would protect 446 miles of outstanding rivers in New Mexico's Gila and San Francisco watersheds under the Wild and Scenic Rivers Act. The Greater Gila river system is one of the largest free flowing river systems in the southwestern United States, and contains numerous river segments used for paddling and other forms of water-based outdoor recreation. These waterways allow recreationists to explore some of the most remote and most scenic areas of New Mexico. Wild and Scenic designation will protect these recreational values, which help provide the foundation for New Mexico's outdoor recreation economy, which comprised 2.4% of statewide gross domestic product in 2023.

Wild Olympics Wilderness and Wild and Scenic Rivers Act (S. 1737)

The Wild Olympics legislation will protect more than 125,000 acres of Wilderness and 464 river miles as Wild and Scenic on the Olympic Peninsula and preserve salmon streams and wild lands adjacent to Olympic National Park. In addition to protecting conservation values, the bill protects hundreds of miles of trails, scores of climbing sites, dozens of whitewater paddling runs, and valued backcountry ski terrain.

The Olympic Peninsula, with Olympic National Park and the adjacent Forest Service lands and rivers, is an important part of the outdoor recreation landscape in Washington, and preserving these iconic lands and rivers will benefit the state's growing outdoor recreation economy. Outdoor recreation in Washington added more than \$22.5 billion to the state's economy and supported more than 121,000 direct jobs in 2023.

While most of the prime Olympic Peninsula mountaineering destinations are within the Olympic National Park, several summits and crags of interest lay outside of existing Park and Wilderness boundaries on the Olympic National Forest. The Wild Olympics Wilderness and Wild and Scenic Rivers Act promises to provide lasting





















protection to places valued by climbers, locally and around the world. Proposed additions to the Mount Skokomish Wilderness, for example, will protect scrambling and climbing objectives including Mount Washington, Mount Pershing, Jefferson Peak, Mount Ellinor, and the nearby Ellinor Towers. In the spring, Mount Ellinor is a destination for backcountry skiers and snowshoers.

For whitewater paddlers, the region is unique because the watersheds that radiate out from the Olympic Mountains receive several feet of precipitation each year, providing an incredible number of river miles in a small geographic area. Dozens of whitewater runs pass through towering ancient forests and moss-covered gorges. The rivers also serve as a conveyor belt for sand that forms the beaches and surf breaks on the wild Washington Coast.

Because of the collaborative approach employed in the bill's development, embracing input from local and national mountain biking stakeholders among others, the legislation enjoys broad support from the mountain biking community. We are particularly pleased to support legislation that designates Wilderness while also using other protective designations where appropriate. The mountain biking loop trail along the Dungeness River passes through ancient forests and along the banks of a wild river. By including the trail within the Wild and Scenic River corridor but outside of proposed Wilderness, a designation is applied that will protect and enhance the mountain biking experience alongside conservation values.









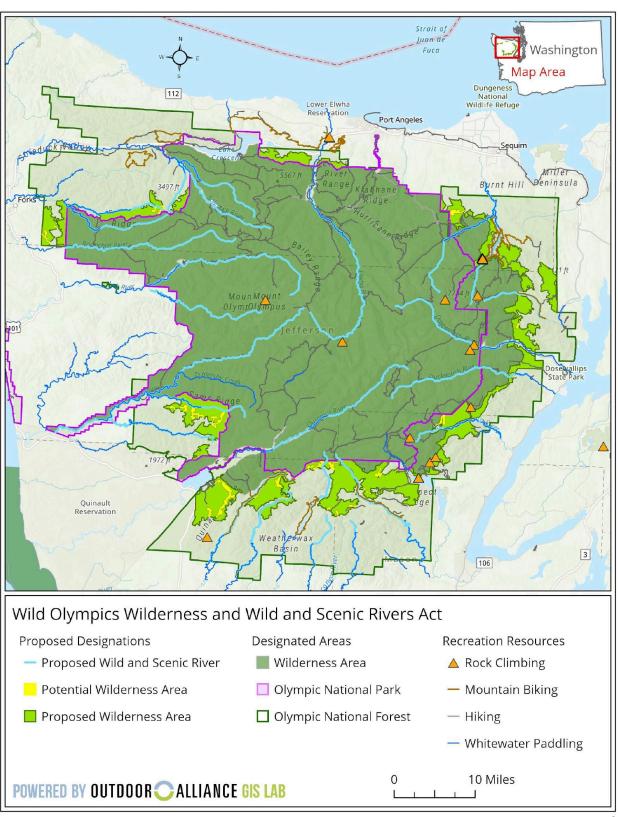








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Cross-Boundary Wildfire Solutions Act (S. 2033)

Outdoor Alliance supports the Cross-Boundary Wildfire Solutions Act, which would require the Comptroller General to complete a study on improving wildfire management across jurisdictional boundaries. Wildfires often burn across a mix of land ownerships, moving between private lands and lands managed by federal, state, and local governments. The study required by S. 2033 could improve fire management outcomes by identifying federal policy changes that might make cross-boundary wildfire management more efficient.

Historic Roadways Protection Act (S. 90)

Outdoor Alliance opposes the Historic Roadways Protection Act, which would prohibit the BLM from completing or implementing certain travel management plans in Utah until a list of 22 court cases involving historic roads has been adjudicated. The travel management areas affected by this bill include numerous outdoor recreation opportunities that members of our community value and enjoy. We are very much in support of making appropriate travel management planning for motorized vehicle use on federal land a priority, including the subsequent development of practical motor vehicle and over-snow vehicle use maps for the benefit of the recreating public. Tying these travel management plans to separate, uncertain, and potentially lengthy court decisions will unnecessarily prevent the BLM from modernizing recreation management in areas where it is needed to address resource impacts.

Brian Head Town Land Conveyance Act (S. 1860)

Outdoor Alliance opposes the Brian Head Town Land Conveyance Act, which would convey 24 acres of federal land on the Dixie National Forest to the town of Brian Head, Utah—the site of a proposed ski resort expansion—at no cost to the town. While land transfers of this size are not uncommon, these sorts of transactions have historically required payment to the federal government, a land exchange, or some other fair compensation to American taxpayers to account for the reduction in federal land. This bill would grant federal land to Brian Head for free, without any requirement for public input or other process to take the concerns of the local



















community into account. We are concerned that this legislation sets a dangerous precedent that opens the door to further privatization of federal lands in gateway communities without a fair process or a fair return to the American public.

Wildfire Response and Preparedness Act (S. 902)

Outdoor Alliance requests that the Wildfire Response And Preparedness (WRAP) Act be clarified to make clear that this bill does not mandate that fire managers pursue a full suppression strategy on every wildfire. Currently, the bill would mandate a 30-minute response time for evaluation for purposes of suppression following wildfire ignitions on most federal lands.

While we support a swift and efficient wildfire response, we are concerned that this bill represents a return to something akin to the "10 AM Policy," where for decades the Forest Service aimed to suppress every wildfire by 10 AM the day following its discovery. This policy of near-total fire suppression led to a widespread and unnatural buildup of fuels in forests and other ecosystems across the country, which is a primary driver of the increase in large, severe wildfires seen on public lands today. ¹² In order to ensure that this trend does not continue, it is essential that federal fire managers maintain the flexibility to manage some wildfires for resource objectives where it is safe and ecologically appropriate to do so. To remedy this concern we recommend that the references to "fire suppression" in Sections 2(a)(2) and 2(b)(2(B) be changed to "fire management" to ensure that this legislation isn't mandating a particular wildfire response.

American Voices in Federal Lands Act (S. 2262)

The American Voices in Federal Lands Act would require that the BLM implement a Completely Automated Public Test to tell Computers and Humans Apart (CAPTCHA) test for comment submissions regarding rules and regulations affecting BLM lands and would establish that BLM can only consider comments submitted by U.S. citizens. While we support the use of CAPTCHA technology in this context, we are

¹² See, Kimiko Barrett, Federal Wildfire Policy and the Legacy of Suppression, Headwaters Econ. (Apr. 2020), https://headwaterseconomics.org/natural-hazards/federal-wildfire-policy/; See also, Sean A. Parks et al., Wildland Fire Deficit and Surplus in the Western United States, 1984-2012, 6 Ecosphere 12 (2015), doi:10.1890/ES15-00294.1.





















concerned that requiring proof of citizenship in order to submit public comments will add unnecessary complexity to the public comment process, causing BLM to receive fewer substantive comments on its decisions and ultimately creating an obstacle to BLM getting the best information. Public comment periods are not elections. Their purpose is to provide an avenue for members of the public to raise substantive issues for the agency to consider. By making the public comment process more complex, S. 2262 risks reducing public involvement in BLM decisionmaking, and risks limiting the substantive information that the agency receives through the public comment process.

Thank you for considering our community's input. We look forward to working with you to support America's public lands and waters in the 119th Congress.

Best regards,

Louis Geltman

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Vice President for Policy and Government Relations **Outdoor Alliance**

Adam Cramer, Chief Executive Officer, Outdoor Alliance cc: Heather Thorne, Executive Director, Access Fund Beth Spilman, Executive Director, American Canoe Association Clinton Begley, Executive Director, American Whitewater Kent McNeill, CEO, International Mountain Bicycling Association David Page, Executive Director, Winter Wildlands Alliance Tom Vogl, Chief Executive Officer, The Mountaineers Ben Gabriel, Executive Director, American Alpine Club Madeline Bachner Lane, Chief Executive Officer, Colorado Mountain Club Chad Nelsen, Chief Executive Officer, Surfrider Foundation















