



Written Testimony of Runners for Public Lands (RPL)

Before the U.S. House Committee on Natural Resources, Subcommittee on Federal Lands Oversight Hearing on Implementation of the EXPLORE Act (America250), with a Focus on Title III (SOAR Act), January 21, 2026

Chair, Ranking Member, and Members of the Subcommittee: thank you for the opportunity to submit testimony on implementation of the EXPLORE Act, with a particular focus on Title III—the Simplifying Outdoor Access to Recreation Act (SOAR Act). Runners for Public Lands (RPL) commends Congress for enacting this bipartisan package and for recognizing that well-managed outdoor recreation is both a public good and a cornerstone of many local economies. We also appreciate the Forest Service, the Department of the Interior, and career staff across the federal land agencies for the early work underway to translate the Act’s directives into practical permitting improvements. Continued collaboration and timely implementation will be essential to ensure the EXPLORE Act’s reforms deliver real, on-the-ground benefits for the recreating public and the public lands we all steward. RPL is a national nonprofit dedicated to protecting public lands and expanding access to nature for all. We represent a growing constituency of trail runners, community running clubs, run-specialty retail shops, nonprofit partners, and race directors who depend on Special Recreation Permits (SRPs) to responsibly host organized events on federal public lands.

SOAR matters to the running community because SRP decisions are not abstract administrative actions. For trail running events, an SRP often determines whether a race happens at all, whether it can be held safely, and whether it can continue as a longstanding community tradition. Permitting affects everything from route selection and seasonal timing to medical coverage, volunteer coordination, parking and shuttle plans, waste management, and post-event stewardship. When permits are delayed or requirements shift mid-cycle, race directors can lose a year of planning and community investment in a matter of weeks. For rural gateway communities, permit delays can mean fewer visitors and less revenue during critical tourism seasons.

Across the country, thousands of trail races are organized each year, led by thousands of volunteer and small-business race directors. A substantial share of these events occur on federal public lands—often on National Forest, BLM, or Park Service trail systems—where organizers must secure Special Recreation Permits, coordinate safety and medical plans, manage trailhead logistics, and comply with resource protections. When SRP processing is delayed or inconsistent, entire race seasons can be jeopardized, with direct impacts on participant safety planning, volunteer coordination, and the local economies that depend on these events.

RPL’s interest in SOAR extends beyond permit applicants. Most trail runners will never apply for an SRP, but they experience the permitting system indirectly every time they go out the door. Permitting drives whether trailheads are staffed and maintained, whether seasonal trail work and basic sanitation occur, whether infrastructure such as water sources are functioning and can be

relied upon, whether closures are communicated and enforced, and whether agencies have the capacity to manage visitor use in ways that protect resources and preserve a quality trail experience. A permitting system that is timely, consistent, and adequately staffed supports safe, predictable access for everyday runners as well as for organized events.

This testimony sets out RPL's priorities for SOAR implementation—grounded in the experience of event organizers and runners across the country. First, we explain why agency staffing and resources are the deciding factor in whether SOAR succeeds, because the law's benefits will not materialize without trained local permit administrators and functional national and regional capacity. Second, we urge the agencies to implement SOAR through clear, public-facing guidance developed with meaningful stakeholder input and practical field testing—using interim direction as a tool to avoid paralysis while still ensuring transparency before guidance becomes the de facto rulebook. Third, we highlight SOAR reforms that can substantially improve the permitting experience for running events, particularly the pathway for low-impact, “nominal effects” organized events and the statute's focus on predictable timelines and modernized systems. Finally, we identify targeted refinements that would reduce avoidable friction, including clarifying fee practices, enabling multi-year permits for recurring events, and improving multi-jurisdiction coordination.

I. RPL and the Trail Running Community's Stake in SOAR

RPL's mission is to empower runners to protect public lands and expand access to nature for all. Trail runners experience public lands in a direct, place-based way: our members are on the trails daily, across seasons, and across regions. Many also serve as volunteers and stewards—organizing trail maintenance, supporting Leave No Trace education, and partnering with land managers and local communities.

Trail races and organized runs are often stewardship anchors. Many events fund trail maintenance, support local volunteer groups, and introduce new constituencies to public lands in a structured, responsible manner. But races are also uniquely sensitive to permitting uncertainty. Event planning requires long lead times to secure insurance, medical services, timing systems, aid station logistics, volunteer recruitment, and participant communications. A permit issued late—or with unclear requirements—can force a cancellation, and cancellations impose real economic and reputational costs on volunteer directors and host communities.

SOAR's reforms are also important because they can strengthen day-to-day trail access and stewardship. When agencies spend less time on duplicative paperwork and inconsistent processes, they can redirect limited staff capacity to the core work trail runners depend on: maintaining trails, managing congestion, protecting sensitive resources, and coordinating with local partners and volunteers. In other words, streamlining permitting is not only about improving the applicant experience—it is also about freeing up capacity so public lands can meet increasing recreation demand without sacrificing resource protection or visitor safety.

SOAR's purpose—streamlining, consistency, and modernization—aligns with what event organizers need: timely decisions, clear expectations, and a process that protects resources without unnecessary duplication.

II. Staffing and Resources Are the Foundation of SOAR Implementation

The most immediate risk to SOAR's success is not statutory design; it is capacity. Recreation permitting is staff-intensive even under stable conditions. SOAR adds new expectations: improved timelines, better public transparency, potential new permit categories and screening tools, and cross-agency coordination. Those improvements require both field capacity and programmatic leadership.

A. What staffing shortfalls look like on the ground

When staffing is thin, event organizers encounter predictable breakdowns:

- **Communication gaps** during the planning window (no clear point of contact; slow responses to routine questions).
- **Processing delays** that compress safety planning into the weeks immediately before an event.
- **Inconsistent requirements** across units, even for the same type of event, because staff must improvise without shared templates or current training.
- **Deferred basic services**—such as trailhead maintenance, sanitation, and hazard mitigation—that affect event safety and participant management.

For a race director, these are not minor inconveniences. If a permit is delayed, the organizer cannot finalize participant caps, medical plans, or course logistics. This increases risk for participants, volunteers, and agencies—and it undermines the very public safety and resource protection objectives the permit system is supposed to advance.

Staffing shortfalls harm more than permit timelines. When recreation offices lose personnel, the impacts are visible to everyday runners: deferred trail maintenance, delayed hazard mitigation, reduced visitor information, and closures of basic facilities and access points. These conditions affect safety and resource protection for all users—not just permitted groups. For trail runners, the result is a more fragile and unpredictable access environment, including trail conditions that deteriorate faster than they can be repaired and reduced on-the-ground management during peak seasons.

B. National and regional capacity is equally important

SOAR cannot be implemented unit-by-unit through informal practices. Agencies must produce consistent guidance, standardized templates, and training so that district and field offices are not left to invent their own approaches. That work requires experienced staff at the national and regional levels—people who understand permitting law, recreation management, NEPA pathways, risk management, and the operational realities of organized events.

If agencies are losing that programmatic capacity, SOAR reforms risk becoming uneven and unpredictable: some units will innovate while others slow down, and the running community will face a patchwork that is functionally indistinguishable from the pre-SOAR status quo. RPL urges Congress to pair oversight with the resources and staffing needed to ensure SOAR is

implemented consistently, with adequate personnel to develop guidance, train staff, modernize systems, and process permits on realistic timelines.

III. Guidance and Transparency: Event Permittees Need Predictable Rules They Can Plan Around

For SRP holders, “guidance” is not just internal direction—it becomes the operating standard. Guidance determines what counts as a complete application, what supporting documents are required, what conditions are routinely imposed, how changes are handled, how timelines are interpreted, and how fees are calculated. When guidance is unclear or developed without real-world input, the resulting friction does not just burden permittees; it consumes agency time through back-and-forth emails, rework, appeals, and inconsistent decisions.

RPL therefore urges agencies to implement SOAR through a transparent process that:

1. **Publishes draft guidance in a public-facing format** that event organizers can find and understand;
2. **Invites meaningful input** from permittees, community partners, and field staff; and
3. **Produces clear, practical final direction** that aligns with the statute and reduces unnecessary variance across units.

Clear, public-facing guidance benefits the broader running community because it supports consistent, predictable management decisions that shape the trail experience. When guidance is unclear or unevenly applied, agencies may respond with inconsistent closures, changing use allocations, or last-minute restrictions that affect public access and visitor use patterns. Transparent guidance—especially when informed by stakeholder input—reduces confusion, improves compliance, and helps agencies communicate expectations to the recreating public, including the many trail runners who are not affiliated with any event.

IV. Implement the “Nominal Effects” Pathway and Modernize Event Permitting

Trail running includes everything from small community fun-runs to large endurance events. A modern permitting system should recognize those differences. One of SOAR’s most promising features is its framework for organized events that have minimal on-the-ground impacts and do not require extensive, customized terms and conditions.

For the running community, this matters because many local races can be designed to minimize impacts: use existing trails; avoid sensitive seasonal windows; cap participation; rely on pack-in/pack-out and strict waste management; and coordinate volunteer stewardship. If agencies have a reliable, well-defined process for identifying these low-impact events early, staff can focus their time where it is genuinely needed—higher-use events, sensitive areas, and complex multi-jurisdiction courses.

RPL recommends that agencies prioritize development of:

- A **clear screening tool** for nominal-effects determinations, with examples tailored to organized running events;
- A **standardized short-form application pathway** for small, low-impact events; and
- A **predictable amendment process** so routine changes (minor reroutes due to washouts, small schedule adjustments) do not trigger full reprocessing when impacts are not materially different.

This is a pro-stewardship outcome: it conserves staff time, rewards responsible event design, and focuses agency oversight where it improves safety and resource protection.

The “nominal effects” framework can benefit everyday trail runners by allowing agencies to focus staff attention where it most improves safety and resource outcomes. When low-impact organized activities are handled through streamlined pathways, agencies can spend more time addressing the issues that affect all trail users—trail sustainability, visitor conflicts at pinch points, seasonal protections, and timely maintenance. That rebalancing is good governance: it supports responsible group use while preserving the quality of the shared trail experience for the broader public.

V. Interagency and Multi-Jurisdiction Coordination

Race courses sometimes cross administrative boundaries—between ranger districts, between BLM field offices, or between federal agencies. When organizers must secure separate permits that are processed on different timelines and impose different baseline requirements, risk management becomes harder and compliance costs increase. This is especially challenging for volunteer-led races, smaller nonprofits, and events in rural areas with limited administrative capacity.

RPL urges agencies to implement SOAR’s coordination tools with organized events in mind. At a minimum, agencies should provide:

- A **single coordinated intake process** for multi-jurisdiction events;
- A **unified set of core permit conditions** where appropriate (safety planning, aid station protocols, sanitation requirements, reporting); and
- **Clear points of contact and shared timelines** so organizers can complete planning steps on schedule.

The goal is not to eliminate agency discretion; it is to prevent duplication and conflicting requirements that make safe event operations more difficult.

Interagency coordination is also essential for ordinary trail runners because many trail networks cross jurisdictional boundaries. When agencies coordinate well, runners see consistent signage, coherent closure information, predictable rules, and safer access—rather than conflicting messages at trailheads and fragmented management along a single route. SOAR’s emphasis on

coordination and modernization can improve how agencies communicate and manage these connected landscapes for all users

VI. Targeted Refinements to Reduce Avoidable Friction

RPL supports SOAR’s direction and urges continued oversight to ensure implementation is workable for organized events. A few refinements would deliver meaningful improvements for trail races:

A. Restore flexible discretion around “large group” thresholds across agencies

A bright-line participant threshold can create arbitrary outcomes. A race with 80 runners on durable trails with strong stewardship plans may have no greater impact than a race with 70 runners—yet a rigid cutoff can force dramatically different administrative pathways. RPL recommends restoring some agency discretion to align the permit approach with actual conditions and impacts.

B. Standardize fee calculation practices for organized events

Event organizers need predictable, uniform fee rules to budget responsibly and set participant pricing. Agencies should provide clear guidance on what counts toward “gross revenue,” how charitable fundraising is treated, and how incidental sales (shirts, photos, small merchandise) are handled—so that similarly situated events are not treated differently across units.

C. Make multi-year authorizations routine for recurring events

Many races are long-running annual events with stable course footprints and well-established operations. Requiring a near-complete reapplication each year wastes staff time and injects needless uncertainty into safety and logistics planning. Agencies should implement SOAR in a way that strongly favors multi-year authorizations for recurring events, with streamlined annual updates for material changes only.

D. Ensure indemnification reforms work for community partners

Many trail races rely on partnerships with local governments, public universities, and nonprofit groups that may face state-law limits on indemnification. SOAR’s indemnification reforms should be implemented through updated templates and consistent training so community partners are not blocked by avoidable legal barriers late in the permitting cycle.

Conclusion

Runners for Public Lands appreciates Congress’s attention to the practical realities of recreation permitting. For trail runners and race directors, SOAR’s promise is straightforward: a permitting system that is timely, consistent, transparent, and proportionate to impacts. If implemented with sufficient staffing, clear public-facing guidance, and modernized tools, SOAR can reduce

administrative bottlenecks, improve safety planning, and enable community-based events to continue serving as stewardship and economic anchors in rural gateway communities.

RPL stands ready to work with the Subcommittee and the agencies to make SOAR successful. We urge Congress to continue close oversight of implementation, pair expectations with resources and staffing, and press for guidance and systems that reflect how organized events actually operate on the ground—safely, responsibly, and in partnership with the public lands we all value.