



INTERNATIONAL MOUNTAIN BICYCLING ASSOCIATION

Submitted 8/26/25 to: [reorganization@usda.gov](mailto:reorganization@usda.gov)

RE: IMBA Comments to United States Department of Agriculture (USDA) on Secretarial Memorandum (SM): 1078-015 - Department of Agriculture Reorganization Plan

The **International Mountain Bicycling Association (IMBA)** is a 501c3 national nonprofit that creates, enhances and protects great places to ride mountain bikes. IMBA's focus is on creating more trails close to home by partnering with federal agencies including the United States Forest Service (USFS), as well as local communities across the country on trail advocacy, education, stewardship and sustainable trail solutions, so everyone has access to great places to ride and recreate. Our comments below are singularly focused on the USFS, a critical agency within the United States Department of Agriculture (USDA) for providing forest trails to the recreation public we serve.

Our work with the USFS has helped develop and implement sustainable trail standards, trained thousands of USFS staff and partners, and mobilized millions of volunteer hours that multiply agency resources. The committed professionals within the USFS continue to be stellar partners with IMBA despite the budget cuts they have endured, but the morale is weakened. Our deep understanding of how Forest Service structures can either enable or inhibit mission delivery has been informed and strengthened by nearly four decades of a USFS partnership.

Based on this experience, and our authentic relationships with the boots-on-the-ground professionals who are partners in our work, we are concerned that eliminating Regional Offices and consolidating functions will significantly reduce the agency's effectiveness in delivering sustainable recreation infrastructure, i.e. trails, trailheads, parking lots, toilets, and campgrounds, which represent one of the Forest Service's most visible and economically vital elements of its stated mission. Any potential disruption to the staff and process structures that manage and deliver trails and recreation will undermine the Forest Service's relevance.

IMBA holds the USFS and its staff at all levels in high regard. IMBA also welcomes agency optimization to further improve the USFS into an agency that is even more accountable, effective, efficient, and affordable in meeting its mission. These, of course, are the intended and understood positive outcomes of any thoughtful restructuring. Based on our four decades of partnership, we are not confident this can be achieved under the current proposed plan.

The mission of the USFS is ***“to sustain the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations”***. The USFS goes on to state that, as set forth in law, this ***“mission is to achieve quality land management under the sustainable multiple-use management concept to meet the diverse needs of people.”***

We emphasize these critical mission components because if a reorganization weakens the USFS's capacity to serve all Americans, the Administration risks diminishing returns and ultimately failing to achieve the stated intent of the 13 guiding principles of the agency. Moreover, if this change fails to adequately plan for how the reorganization will impact USFS staff productivity, it could create a ripple effect across communities that rely on USFS lands to adequately manage trails and recreation, coordinate volunteer stewardship projects, and

complete NEPA processes for local forests. Without critical regional staff, trail projects and outdoor recreation that draws millions of visitors and dollars to USFS regions each year, could ultimately suffer. Forest and district offices would experience reductions in bandwidth, technical expertise, and budgetary flexibility needed to fill the void of regional assistance.

Secretary Rollins and USDA leadership have outlined in their memorandum, dated July 24, 2025, four guiding principles for the reorganization of the Department of Agriculture. These proposed changes could have a positive impact on the agency if implemented with care and focus. We implore the agency to consider the critical nature and impacts of the USFS's mission across 193 million acres as *also essential* in achieving the sustained yield through the multi-use mandate the agency operates under by law. Any reorganization of the USFS should adhere to these mission principles as well, not just the raw pillars guiding this reorganization effort.

**Shortcuts:**

**[Comment Section- Importance of a Viable USFS](#)**

**[Comment Section- Key Impacts to USFS](#)**

**[Comment Section- Top Recommendations](#)**

**[Comment Section- Critical Role of Partnerships](#)**

**USDA Secretary Memorandum 1078-015: USDA Reorganization Plan**

The USDA Reorganization Plan aims to consolidate and restructure the Department of Agriculture to improve effectiveness, reduce bureaucracy, and save costs. The plan will significantly restructure the U.S. Forest Service (USFS), intending to reshape how the agency delivers its multiple-use mission. While the plan is framed as a way to reduce bureaucracy, cut costs, and improve efficiency, the actions may carry far-reaching consequences for Forest Service operations and that could be a threat to efficiency, rather than a pathway to it. The following comments aim to explore this more thoroughly. While the Administration has made the plan available for public comment, the details are absent and the timeframe for public comment is inadequate. This leads to comments that are more speculation than concrete assessment.

What is clear is that the Reorganization Plan shifts the USFS away from its decentralized, regionally divided framework toward a highly consolidated model. The elimination of the nine regional offices within a year, loss of workforce, and consolidation of research is highly and broadly anticipated to weaken the agency's ability to respond to diverse local conditions across its 193 million acres. In particular, recreation management, and the budgets it relies upon, stand to suffer from these changes if the longstanding cooperation between fire funding, shared staffing, and recreation program facilitation is disrupted. The USFS's effectiveness in serving the recreation needs of gateway communities, supporting rural economies, and managing multiple uses is likely to be diminished as a result of further cuts and over-burdened staff.

Additional assessment is needed to support and provide specificity for this plan. If this action is implemented without an appropriate study of the cost savings and the benefits, or threats to the agencies it impacts, this reorganization could be counter-productive and devastate the people and the economies of the communities that rely on the functionality of the USFS.

### **USDA Lists Four Pillars of Reorganization:**

1. Ensure Agency Size Aligns with Resources and Priorities
2. Bring USDA Closer to its Customers
3. Eliminate Management Layers and Bureaucracy
4. Consolidate Support Functions

Critical questions that must be asked:

- **How can the Secretary pursue the USDA reorganization of USFS in a way that aids agency function and maintains alignment to the USFS mission?**
- **How can the Secretary help the USFS better meet the demand for trail-based recreation and advance economic goals as it pertains to outdoor recreation in gateway communities across the country?**

The USFS is a mission-driven agency with overlapping positions and responsibilities across numerous program units. Its jurisdiction spans 193 million acres spread across 44 states, Puerto Rico and the Virgin Islands. These include: recreation, timber, grazing, wildlife, watershed management, Wilderness, partnerships, and the law enforcement that supports these uses. Some staff functions can likely be consolidated either regionally or shared across units without major trade-offs to help reduce overhead costs and eliminate bureaucratic bloat. However, other positions are inherently local and unique, and need to remain decentralized rather than part of a hub or eliminated in the vein of consolidation. This is why the current management layer of the Region exists.

The purpose of Regional Offices is to provide program leadership, oversight, and support to improve the efficiency of numerous other positions by coordinating projects and initiatives across geographical regions. This structure helps implement the national priorities set by the chief's office or the administration. The oversight helps ensure a level of necessary consistency and adherence to laws and regulations, while the support helps ensure the institutional knowledge is delivered and coordinated. Together, these efficiently deliver priorities on the ground. This allows the forest-level and district-level staff to focus on on-the-ground implementation without being bogged down by functions better served through an intermediary, such as a regional program staff position, or spending time on the steep learning curves of process-related functions that slow progress in the field.

Critical questions to ask should focus on which positions are no longer necessary in today's world, what could be outsourced or accomplished through other available means, and which positions serve an efficacious value – even if duplicative by region, forest or district – that should be retained for local value. When striving for efficiency the USDA should take into account the nature of these nuances to ensure the best, mission-centric outcome that serves all Americans.

Across the country, at the forest and district levels, the USFS has numerous vacant positions in areas focused on recreation management, land management planning, partnership facilitation, grants, and projects. This leads to two distinct problems for forests and IMBA's relationship with them. Either work is not getting done where vacancies exist and worthy, viable projects are stalled; or remaining staff are over-burdened by attempting to cover essential duties of these vacancies, which is leading to reduced productivity and burnout. **The Secretary**

**should not further exacerbate this problem with this reorganization. We caution against a paper exercise of reducing assumed redundancy.**

### **Importance of a viable USFS**

For almost 40 years, IMBA has relied on the USFS as a critical and trusted partner in our mission to support trails communities across the country. For many communities adjacent to USFS lands, **recreation has become the most visible, economically vital, and socially relevant aspect of the agency's work**. With approximately 35,000 employees, the USFS is by far the single largest agency under USDA from a personnel standpoint and will need to continue to manage its 193 million acres of forests and grasslands across the country.

While timber, grazing, and mineral programs have historically dominated the USFS's national portfolio, those traditional sectors have been reduced significantly in both scale and economic value. In contrast, visitation to national forests has steadily grown, with hundreds of millions of recreation visits each year fueling local economies. The USFS has a community connection that is critical to uphold for continued recreation management. Unlike timber or grazing, which may benefit a narrower set of stakeholders, recreation touches nearly every community member and visitor, from hikers and campers to mountain bikers, hunters, anglers, and winter sports enthusiasts. This broad relevance makes recreation the USFS's most immediate and tangible public service. **For this reason, to much of the American public, recreation is the Forest Service.** Trails, campgrounds, scenic byways, and ski areas are how people experience the agency's mission. As traditional extractive programs have declined, recreation has become the defining feature of how the USFS delivers value to society.

The role and value of trail-based recreation on USFS lands is critical to the viability of local economies and to the resident health and overall quality of life of communities across the United States. This is especially true for growing communities and communities transitioning from other evolving industries. USFS staffing and support are essential to the community-based economic growth and value of trails on USFS lands. They help streamline on-the-ground projects, and move them to fruition.

Successfully navigating the federal process takes partnerships that rely on issue experts at myriad levels of the USFS, from the Ranger district to the Regional office. While it is often not immediately apparent to all parties involved, the regional office staff play critical roles in helping process grants, implement master cost share agreements, and advise local staff on NEPA requirements. Regional staff also help manage budgets across the region.

The USFS provides resource conservation for 193 million acres of national forests and grasslands, protecting clean water, wildlife habitat, and healthy ecosystems. By balancing sustainable resource use with long-term conservation, the agency ensures these public lands continue to provide environmental, economic, and recreational benefits for future generations. Individual states are ill-equipped to manage these lands and rely on coordinated partnerships with the USFS at local and regional levels.

### **Key Impacts of the Proposed Forest Service Reorganization:**

**Workforce Reductions:** The USDA proposal sets the stage for large-scale workforce contraction. With more than **15,000 employees already separated** through voluntary programs

including early retirement and thousands more through reduction in force programs, this action will only grow the numbers of those previously employed in mission-critical roles for the USFS. Firefighting, recreation, and other seasonal/temporary positions are acknowledged as areas of high demand, but no assurances are given that staffing will remain sufficient to meet growing needs. It is unclear whether regional staff will be redistributed to forest-level locations or eliminated wholesale. Recreation, trails, and local services may suffer as staff who traditionally balance fire assignments with recreation duties are no longer available or vacancies stack up and paralyze productivity.

As Dale Bosworth, chief of the Forest Service under President George W. Bush famously stated, “You can’t say we’re going to increase the timber harvest then fire half the people who go out and do all the work.” This was as true in 2003 as it is under these workforce reductions in 2025.

**Institutional Knowledge Retention and Transfer Plan:** In addition to losses of personnel, the loss of the institutional knowledge those professionals possess is a grave threat to effective and efficient management. The USDA Secretary and the Chief of the USFS must develop an *Institutional Knowledge Retention and Transfer Plan* to preserve the continuity of operations within the agency and to ensure efficiency and effectiveness are not sacrificed as a result of a haphazard reorganization plan. Whether positions are vacated through voluntary or forced measures, it would be counter-productive to the goals of the Secretary if key functions, knowledge and expertise within the USFS Regions were lost in the process. This would lead to stalled projects, reduced productivity, and paralyzed planning. These potential losses will end up costing the agency more money in the short- and long-term than the costs this action intends to save, and will cost local gateway communities the critical revenue they rely on which have been generated by the economic benefits of a functional and productive agency.

**Elimination of Regional Offices:** Phasing out the nine Forest Service Regional Offices would strip away a vital layer of geographic oversight and technical expertise. Regions currently bridge the Washington Office and field-level Supervisor Offices, ensuring projects are tailored to local forests and communities while streamlining partnerships. Without them, controversial local decisions would shift back to D.C.—contradicting the goal of moving authority closer to communities—leaving the Chief’s office bogged down with field issues. This centralization risks slower response, politicized decision-making, and greater waste from stalled or reversed actions that misuses local resources and neutralizes localized decisions.

**Ineffective Outcome:** A reorganization plan intended to cut spending, localize decisions, and streamline projects will fail if inefficiencies cost the agency more, if the lack of a middle management layer only sends decisions to the Washington Office/USFS Chief’s office, and if staffing shortages paralyze projects, stalling progress and implementation for years to come.

**Budgetary and Programmatic Dependence on Fire:** As the risk of fire increases, more clarity is needed to define how the USFS will meet those demands through this reorganization while not devastating other programs in the process. Wildland fire often has enormous impacts

to recreational assets and recovery is predicated upon coordinating funding and resources. By signaling separation of fire management functions from the Forest Service, the plan risks removing one of the largest and most flexible funding streams that currently supports broader co-related USFS work, including significant benefits to recreation, roads, and infrastructure. Without fire-related funding and workforce overlap, recreation management could lose both staffing capacity and indirect financial support which would further cripple an already budget-strapped agency.

**Unmanaged Recreation:** Under President George W. Bush, USFS Chief Dale Bosworth identified "unmanaged recreation" as one of the "four threats" to the health of the nation's forests and grasslands, alongside fire and fuels, invasive species, and the loss of open space. His articulation of these threats helped to focus agency and partner efforts on addressing these critical issues. Extreme staffing and budgetary cuts will result in paralysis of decisions and closures and lead to degradation of resources and quality recreational experiences at a time when more and more Americans are seeking outdoor recreation. Additionally, this staff and office consolidation is likely to curb real progress in getting trail development projects completed. This will result in increased unplanned and unmanageable conditions on our forest lands and lead to greater decline of our nationally cherished places.

Two examples:

1. In late 2024, the Routt National Forest surrounding Steamboat Springs, Colorado signed and approved the [Mad Rabbit Trails Plan](#). This plan is designed to meet increased user demand by building more than 30 miles of new trails that connect to existing forest, county, and city trail systems. The plan comes with \$1.8 million in non-taxpayer funding that can be used to complete more than 90% of the build. However, if the USFS lacks staffing capacity to move this plan to the implementation phase, to actually assist in the oversight and coordination of the construction, and to manage the necessary paperwork that is involved, then this available money from a special community fund will be repurposed to other projects. This is a real threat as forest service staff and their resources are stretched. This reorganization plan may only further those resource shortages. This is just one of many examples of trail projects that need to continue in order to prevent the taxpayer investments behind these approved decisions from going to waste.
2. The Continental Divide National Scenic Trail: The Continental Divide National Scenic Trail (CDNST) is a 3,100-mile national system trail that crosses a patchwork of jurisdictions. The USFS manages the trail as the lead agency responsible for planning and management which is coordinated at a national and regional level. The CNDST crosses five (4) Regions (R1, R2, R3, R4) and more than 20 individual forests. In order for this trail's management to be successful, each region provides administrative oversight and allocates resources for the sections of trail under its jurisdiction. The trail also crosses other federal (BLM, NPS) and state agency lands and the USFS is expected to lead the coordination of these partner agencies. Any loss of staff and knowledge will lead to a disruption of the management of this nationally cherished resource. There are

many examples of both national scenic trails and regionally important trails, such as the Bonneville Shoreline Trail in the Uinta-Wasatch-Cache National Forest.

### **Top Recommendations:**

- **Strategic Plan:** Successful USFS Reorganization must be informed by a thoughtful plan that minimizes disruption to on-the-ground projects Americans rely upon under forest management.
- **Reinvest:** Reinvest cost saving at the forest level by filling critical USFS staff vacancies to help fulfill the forest mission.
- **Direct Hiring Authority:** Provide USFS Direct Hiring Authority (DHA) to fill critical vacant positions—both pre-existing positions or those created as a result of this proposed reorganization.
- **Public/Private Partnerships:** Expand USFS partnership management capacity and resources to fill any appropriate voids created through the reorganization.
- **Prioritize the Recreation Economy:** Ensure that plan components result in a sustainable outdoor recreation economy being further fostered as a tangible outcome of the reorganization.

### **Strategic Plan:**

If localized decision making is to be increased, there needs to be the staffing, the expertise, and the resources necessary for implementation at the local forest level. There is simply no valid substitute for adequate capacity and financial availability to get the job done. This reorganization must not further degrade the USFS ability to meet the USDA's own stated goals. If closing and phasing out the Regional Offices is deemed necessary, it should be phased at a more gradual rate, versus forced within a year which will only wreak more havoc. Highly productive and long-standing partnerships, like those between IMBA and the USFS, will rely on a smooth transition to ensure the efficiency and efficacy USDA seeks.

### **Reinvest:**

Based upon research, the USDA projects the department-wide reorganization will result in a savings of about \$4 billion. There has been no detailed breakdown of the individual departments or what specific savings the USFS expects from regional office closures and staffing consolidation. Coupled with the 3,400 firings in early 2025 and rolling early retirement buyouts, it can be assumed this will be in the tens of millions of dollars. The USFS is by far the largest single agency under USDA from a staffing standpoint. It is fair to say there is likely room for some strategic consolidation of staff and office space. However, it is reported that these cuts have already reduced the workforce at USFS by an estimated 10% to over 20% just this year. These cuts are not a viable solution for an agency to manage 193 million acres.

If the Reorganization plan does generate real cost savings, those resources should be strategically reinvested at the **local forest level** of the USFS. Local forests are where the agency's multiple-use mission is most visible to the public, yet they are also the units that have endured the deepest staffing shortages and loss of capacity over the past decade. Reinvesting in **vacancy backfill and front-line staffing** would allow forests to:

- **Restore Field Capacity** – Filling recreation, engineering, and natural resource vacancies would place more staff in the field to plan, design, and maintain trails, campgrounds, and visitor facilities that directly serve millions of users.
- **Improve Responsiveness to Local Needs** – With more boots on the ground, district-level offices could respond more quickly to the growing recreational demands of adjacent communities, visitor surges, and user conflicts, strengthening local partnerships and improving overall visitor experience.
- **Leverage External Partnerships** – Fully staffed recreation programs are better equipped to engage with nonprofit partners (like IMBA and local trail groups) and apply matching funds or volunteer labor effectively. This leverages the value of federal investments well beyond a 1:1 ratio.
- **Deliver Economic Returns** – Because outdoor recreation drives billions in gateway community economies, reinvesting savings locally has a multiplier effect: healthier recreation infrastructure boosts tourism, small business vitality, and local tax revenues.
- **Rebalance Agency Mission** – As fire management is restructured, reinvestment into recreation ensures that the USFS sustains its relevance to the American public and continues delivering broad benefits in health, wellness, and access to public lands.

### **Direct Hiring Authority- DHA**

IMBA recommends extending Direct Hiring Authority (DHA) to the USFS to quickly fill critical vacancies, both pre-existing or those created by reorganization, to ensure cost savings are efficiently reinvested at the forest level.

### **Critical Role of Partnerships**

IMBA has been a trusted partner of the USFS, working together to develop high-quality trail systems that support both the agency's multiple-use mission and the needs of local communities. **An active Memorandum of Understanding between IMBA and the USFS nationally has formalized our relationship and helps coordinate our common overlapping goals and missions.** The relationship between IMBA and the USFS is a dynamic one, involving more than just formal, written documents; it also includes ongoing communication and collaboration that leads to tangible on-the-ground benefits to the environment, and to recreation for the American people.

We urge the USDA to expand the capacity of the USFS for partnership management and provide the necessary resources to fill any appropriate voids created through the reorganization. The USFS relies heavily on partnerships to achieve its multiple-use mission, which involves balancing diverse demands such as outdoor recreation, timber production, watershed protection, and wildlife habitat on the nation's forests and grasslands. By collaborating with various entities, including non-profit organizations like IMBA, the USFS can leverage its resources, expertise, and community involvement to undertake a broader range of projects and activities more effectively and efficiently than it could on its own. This collaborative partnership is crucial for realizing the USFS's mission of sustaining the health, diversity, and productivity of forests and grasslands for the benefit of present and future generations.

IMBA's work strengthens the economies of gateway communities by attracting outdoor tourism which supports small businesses, while also advancing the health and wellness of

residents through expanded access to sustainable outdoor recreation on USFS lands. As the national leader in trail development, policy, and professional training, IMBA has set the standard for sustainable trail design and planning and these resources are often vetted and informed via our partnerships at the Regional and Washington Office level in order for these resources to aid in the work at the Forest level. As part of IMBA's ongoing partnership with the USFS and our broader scope of work, IMBA has helped educate and train thousands of recreation professionals, land managers, and volunteers, including many within the USFS itself, ensuring trails are built and managed to the highest standards of sustainability and public benefit.

**For example, IMBA's Region 5 Five-Year Cost Share program:**

**USFS R5 Trails Training and Technical Assistance Program**

In partnership with IMBAs Trail Solutions program, IMBA holds a Master Cost Share Agreement with USFS Region 5 (R5 California). The R5 "**Trails Training and Technical Assistance Program**" provides no-cost training and other forms of support specifically to Forests' Trail Programs in the R5 Pacific Southwest Region. Through this, individual Forests can request training workshops; feasibility studies and conceptual plans; support with assessment, design, maintenance, and construction; and reconstruction support for fire/storm-damaged trails. All assistance provided, which is coordinated by R5 staff, includes education and skill development for local Forest staff. Forests are encouraged to invite partner staff and volunteers to take part in these opportunities, as well which leverages this investment beyond the R5 staff themselves. This program began in 2023 with \$460,000. Currently it has approx. \$300,000 remaining through 2028. **These investments have proven invaluable in California and it is successful in large part because the planning and coordination workload is taken off of the shoulders of the Forests' staff and instead handled by the Region 5 staff.** By providing training and technical assistance to Forests throughout the Region, this program aims to ensure that all agency staff assessing, maintaining, and building trails have the fundamental skill sets needed to provide the public with a resilient and sustainable region-wide planned network of high-quality trails and trail experiences. As USFS visitation and stewardship interest among the public is ever-increasing, this is a critical time to provide greater professional development and skills training to Forests and communities, not less.

In addition to the example above, there have been other historical collaborations, such as a Memorandum of Understanding (MOU) between the USFS Southern Region (R8) and local mountain biking organizations, including IMBA. While this MOU was managed and held at the Regional level, it primarily helped facilitate on-the-ground work at the forest and district levels through coordination of projects.

Additionally, a critical ongoing partnership with the Washington Office of the USFS that has led to major successes began in 2017 when IMBA played a key role in passing the National Forest Trails Stewardship Act (NFTSA). The law enables volunteers and partners, including

IMBA, to carry out trail maintenance on USFS lands. This productive partnership led to the The National Forest System Trail Stewardship Partnership Funding Program described below.

#### **The Trails Stewardship Partners Grant Program**

A joint partnership between National Wilderness Stewardship Alliance (NWSA), the USDA Forest Service and on-the-ground trail stewardship groups across the nation. **Managed in coordination with the USFS Washington Office (WO)**, this funding program is broadly focused on engaging non-profit partners and volunteers in trail stewardship projects across all National Forest System Trails. To ensure broad representation and equitable distribution of funds from this program to support a variety of trail user groups, the partnership is composed of American Trails, American Hiking Society, Back Country Horsemen of America, the National Off-Highway Vehicle Conservation Council, International Mountain Bicycling Association (IMBA), and the American Motorcyclist Association which send a representative from each group to participate equally in the selection of the projects awarded with funding. The USFS also provides WO liaisons to help guide the process. The grants support organizations leading trail maintenance efforts in National Forests across the U.S. **As of 2023**, the program supported maintenance and repair of **10,650 miles of trail**, engaged thousands of partner staff and volunteers in **413,000 hours of maintenance work**, and **leveraged federal dollars with \$18.7M in cash and in-kind support at a ratio of 7:1**

#### **Prioritize the U.S. Outdoor Recreation Economy**

Recreation on national forests supports billions of dollars in annual consumer spending in rural communities by sustaining outfitters, guiding services, small businesses, hospitality, and tourism-related infrastructure. For many towns, trail-based outdoor recreation is now the primary connection to federal lands. The Reorganization could have damaging effects on the recreation economies of gateway communities that rely more and more on tourism and livable, desirable communities than on traditional forest products and resource extraction. The healthy economics of outdoor recreation are at risk should the reorganization cripple the USFS and stymie project implementation. Examples of the negative outcomes that are expected to occur without Regional staff capacity include: stymied trail development projects, hampered volunteer stewardship and maintenance, and squandered trails grants for maintenance backlog reductions and trail improvement initiatives.

According to the Bureau of Economic Analysis (BEA), the U.S. outdoor recreation sector generated \$1.2 trillion in economic output in 2023, which equates to about 2.3% of GDP. In terms of "value added", Headwaters Economics reports that the contribution to GDP after subtracting costs, the sector accounted for approximately \$639.5 billion in 2023. This sustained growth underscores the importance of federal land management agencies like the USFS, whose recreation programs provide the trails, campgrounds, and outdoor infrastructure that make such economic contributions possible. Reinvesting in the Forest Service's recreation staff and

infrastructure is essential to sustaining this economic engine. It ensures the benefits of outdoor recreation continue to flow to gateway communities and the broader national economy.

IMBA appreciates the opportunity to provide comments on USDA Secretarial Memorandum 1078-015 and urges the Administration to approach this reorganization with a full understanding of the Forest Service's unique mission and its vital role in supporting trail-based recreation, the economic vitality of gateway communities, and resource stewardship across its 193 million acres. Without careful study and safeguards, this restructuring risks eroding the very capacity needed to achieve the intended outcomes of efficiency and accountability. It could further weaken the good work the USFS is doing providing trails to growing communities and meeting demand. Recreation is now a cornerstone of the agency's value to the public and gateway communities, yet staffing and capacity are already stretched thin. Any cost savings should be reinvested at the forest level to restore field capacity, strengthen partnerships, and maintain the environmental, economic, and social benefits that millions of Americans rely on.

On behalf of IMBA, our 236 affiliated clubs, and national and IMBA Local individual members,

A handwritten signature in blue ink, appearing to read "AC Clark".

Aaron Clark- IMBA Government Affairs Policy Manager