

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Wilderness Workshop v. Boren

Wilderness Workshop · No. Civil Action No. 2023-0678; 23-cv-678 (JMC) · Decided February 24, 2026

SUMMARY

The court holds that section 3210(a) of the Alaska National Interest Lands Conservation Act applies nationwide to nonfederally owned land within the boundaries of the National Forest System, rather than only to land in Alaska. It grants partial summary judgment to the Government and intervenor Berlaimont Estates and denies the environmental organizations’ motion on that issue. The court also concludes that Wilderness Workshop has associational standing.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Jia M. Cobb
JURISDICTION	United States District Court for the District of Columbia
DECIDED	February 24, 2026
DOCKET	Civil Action No. 2023-0678; 23-cv-678 (JMC)
DISPOSITION	other
PROCEDURAL POSTURE	Cross-motions for partial summary judgment in an action under the Administrative Procedure Act challenging the Forest Service's approval of a road through the White River National Forest in Colorado.
STANDARD OF REVIEW	On partial summary judgment, the movant must show that no genuine dispute as to any material fact exists and that it is entitled to judgment as a matter of law. In an APA case resolved on cross-motions for summary judgment, the district court acts as an appellate tribunal and the case is treated as a question of law.
PRECEDENTIAL VALUE	Published federal district court memorandum opinion
PARTIES	Wilderness Workshop, Rocky Mountain Wild v. Michael Boren, United States Department of Agriculture, United States Forest Service, Other government officials sued in their official capacities, Berlaimont Estates

TOPICS

statutory interpretation

judicial review of agency action

administrative law

environmental law

PRACTICE AREAS

administrative law

environmental law

federal courts

statutory interpretation

QUESTIONS PRESENTED

1. Whether section 3210(a) of the Alaska National Interest Lands Conservation Act applies to nonfederally owned land within the boundaries of the National Forest System throughout the United States or only in Alaska.
2. Whether Wilderness Workshop sufficiently established associational standing to challenge the Forest Service's approval.
3. Whether the Government and intervenor-defendant were required to establish standing before defending against the plaintiffs' claims or seeking judgment in their favor.

HOLDINGS

1. Section 3210(a) applies to nonfederally owned land within the boundaries of the National Forest System throughout the United States, not only in Alaska.
2. Wilderness Workshop demonstrated associational standing to pursue the challenged claim.
3. Defendants haled into federal court need not establish standing merely to defend themselves or seek judgment on the plaintiffs' claim.

KEY QUOTATIONS

“Ultimately, the Court concludes that section 3210(a) applies to “nonfederally owned land” throughout the United States, not just in Alaska.” (3)

“Nothing in the provision’s plain text suggests that it only applies in Alaska.” (7)

“The organizations’ motion for partial summary judgment, ECF 29, is DENIED. Berlaimont’s and the Government’s motions for partial summary judgment, ECF 30; ECF 31, are GRANTED.” (14)

FACTUAL BACKGROUND

Berlaimont Estates owns a 680-acre parcel in Eagle County, Colorado, entirely surrounded by the White River National Forest, and sought to build a road providing year-round access to the developable portion of the property. After an extended approval process, the Forest Service authorized the road under its understanding that section 3210(a) of ANILCA required it to provide adequate access to secure reasonable use and enjoyment of the private property. Environmental organizations challenged the approval, citing potential impacts to wildlife habitat and recreation and arguing that section 3210(a) applies only in Alaska.

PROCEDURAL HISTORY

The environmental organizations challenged the Forest Service's approval of Berlaimont Estates' proposed access road, alleging in part that the agency unlawfully applied section 3210(a) of ANILCA outside Alaska. Berlaimont intervened as a defendant, and the Court denied the Government's motion to transfer the case to the District of Colorado. The parties agreed to resolve the geographic-scope issue through cross-motions for partial summary judgment; the Court denied the organizations' motion and granted the Government's and Berlaimont's motions.

DISPOSITION

other

CASES CITED

- Wilderness Workshop v. Harrell, 676 F. Supp. 3d 1, 3 (D.D.C. 2023)
- Gilbert v. Wilson, 292 F. Supp. 3d 426, 433 (D.D.C. 2018)
- Summers v. Earth Island Inst., 555 U.S. 488, 499 (2009)
- Biden v. Nebraska, 600 U.S. 477, 489 (2023)
- Ctr. for Sustainable Econ. v. Jewell, 779 F.3d 588, 596-98 (D.C. Cir. 2015)
- Lujan v. Defs. of Wildlife, 504 U.S. 555, 562-64 (1992)
- Animal Legal Def. Fund, Inc. v. Glickman, 154 F.3d 426, 440 (D.C. Cir. 1998)
- Sugar Cane Growers Co-op. of Fla. v. Veneman, 289 F.3d 89, 94-95 (D.C. Cir. 2002)
- TransUnion LLC v. Ramirez, 594 U.S. 413, 430-31 (2021)
- Nat'l Parks Conservation Ass'n v. United States, 177 F. Supp. 3d 1, 16 n.6 (D.D.C. 2016)
- Mont. Wilderness Ass'n v. U.S. Forest Serv., 655 F.2d 951, 954 (9th Cir. 1981)
- United States v. Srnsky, 271 F.3d 595, 602 (4th Cir. 2001)
- George v. McDonough, 596 U.S. 740, 746 (2022)
- Jazz Pharms., Inc. v. Kennedy, 141 F.4th 254, 263 (D.C. Cir. 2025)
- Nat'l Postal Pol'y Council v. Postal Regul. Comm'n, 17 F.4th 1184, 1191 (D.C. Cir. 2021)
- Circuit City Stores, Inc. v. Adams, 532 U.S. 105, 115 (2001)
- Feliciano v. Dep't of Transp., 605 U.S. 38, 53 (2025)
- Marx v. Gen. Revenue Corp., 568 U.S. 371, 386 (2013)
- Henson v. Santander Consumer USA Inc., 582 U.S. 79, 85 (2017)
- Sturgeon v. Frost, 577 U.S. 424, 430-31 (2016)
- United States v. Jenks, 22 F.3d 1513, 1515 (10th Cir. 1994)
- Cmty.-Serv. Broad. of Mid-Am., Inc. v. FCC, 593 F.2d 1102, 1113 (D.C. Cir. 1978)
- Cisneros v. Alpine Ridge Grp., 508 U.S. 10, 18 (1993)
- RadLAX Gateway Hotel, LLC v. Amalgamated Bank, 566 U.S. 639, 645, 648 (2012)
- Crowley Gov't Servs., Inc. v. Gen. Servs. Admin., 143 F.4th 518, 536 (D.C. Cir. 2025)

