

Forest Service Issues Long-Awaited Direction on Travel Analysis

By Vera Smith and Bethanie Walder

In January 2001, the Forest Service finalized a plan for the long-term management of their oversized and under-maintained road system. That plan basically directed the agency to identify an ecologically and fiscally sustainable minimum road system that would meet resource management and recreational access needs. The plan projected that the agency might reduce the overall road system by more than 30%, and that as a result “unroaded” acreage might increase by up to 15% nationally.

It was a great thing, but it never happened. The White House got a new President, the Forest Service got a new Chief and the policy was undermined. But it stayed on the books. Then, in 2005, the Forest Service adopted a new Travel Management Rule and incorporated this minimum road system analysis into the new travel management rule as “subpart A” of the rule. But nothing else had changed politically, so it still never happened.

During all this time Wildlands CPR, The Wilderness Society and our grassroots partners continued to push for this minimum road system analysis, but we started to call it “rightsizing.” We met repeatedly with the agency after they finalized the 2005 Travel Management Rule asking them how they would incorporate subpart A into the process. But they insisted on implementing subpart B only (the designation of roads, trails and areas for motorized recreation). We worked aggressively on the subpart B process, but kept on pushing the agency, through a variety of mechanisms, to rightsize the system.



Photo by Dan Funsch.

We thought we had made some real progress in 2009, when Congress directed the Forest Service to rightsize the system, but they didn’t really include any teeth. We worked harder, and Congress made a new request in late 2009, as part of the FY2010 appropriations bill – not only did the Forest Service have to rightsize the system, but they had to develop a plan and timeline to do so.

Fast forward almost exactly one year. On November 10, 2010, the Chief’s Office of the Forest Service distributed a directive memorandum entitled, Travel Management, Implementation of 36 CFR, Part 212, Subpart A (36 CFR 212.5(b), to all line officers and program directors. The guidance memo directs all national forests to identify, through a science-based analysis, an ecologically and fiscally sustainable minimum road system by 2015.

In addition to the five years it will take to conduct this analysis nationally, it will likely take decades to actually implement the minimum system on-the-ground. But the plans developed through this process will, over the long-term, create a blueprint for future road maintenance and decommissioning investments, including Legacy Roads and Trails Remediation Initiative funding.

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Rightsizing the road system will help the Forest Service identify clear recreation management goals for roads and trails. Photo by Dan Funsch.

— Travel Analysis, cont'd —

We are extremely pleased with this policy victory. All of our partners who signed onto letters, made trips to DC with us, met with their Regional Foresters, or otherwise engaged in this nearly 10 year effort deserve a huge thank you! But while it is a huge victory on paper, we now have to ensure it is also a huge victory on the ground. The agency must take this opportunity to truly make their road system smaller, ecologically sustainable and fiscally affordable. Such a road system will also provide dependable, consistent recreational access for the public, as opposed to the current situation where the agency routinely runs short of funds and closes or downgrades road access due to lack of maintenance.

For those interested in large landscape connectivity for wildlife, this initiative presents an opportunity to reduce road densities as well as protect and restore linkages and core habitat. For those interested in clean water and fisheries, it is an opportunity to improve water quality and watershed health. And for those interested in fiscal responsibility, it is an opportunity to identify a road system that the Forest Service can afford to maintain.



Photo courtesy of Bureau of Land Management.

Background and Summary of the New Direction

The national forest road system is more than 375,000 miles, enough to circle the equator fifteen times. A legacy of big timber and mining, only 17% (about 66,000 miles) of the national forest road system is open to passenger cars, while the remainder is either closed to public travel or accessible only to high-clearance vehicles. It is underfunded, with only about 20% of the system maintained to standard in any given year, resulting in a multi-billion dollar maintenance backlog. Because of its limited maintenance funding, the agency has been systematically downgrading roads from passenger to high-clearance vehicle status, thus reducing recreational access. For example, between 2002 and 2009, the Forest Service downgraded about 16,000 miles of roads from passenger vehicle to high clearance status. Finally, roads are a primary cause of aquatic degradation, habitat fragmentation, and the spread of invasive weeds among other impacts. These impacts are increasingly problematic in the context of climate change.

Below are the key provisions of the guidance memo:

- the travel analysis report must be completed by September 30, 2015
- the minimum road system should be smaller than the current system
- after 2015, roads that have not undergone this analysis no longer qualify for road maintenance money
- the analysis must include all maintenance level 1-5 roads, and must be science-based
- the final report should include both a map of the minimum road system and a list of roads to be decommissioned
- the national lead for the process is the Director of Watersheds, Fish, Wildlife, Air and Rare Plants; the Directors of Engineering and Recreation are also on the national team
- each region should set up a regional leadership team following the same format, and that regional leadership team has to certify that each forest's final travel analysis meets the requirements
- this process should be interactive with the ongoing Watershed Condition Framework process and vice versa



Rather than maintain their entire road system to the standards required for passenger vehicles, the Forest Service sometimes downgrades roads and reclassifies them as suitable for high clearance vehicles only. Photo courtesy of Bureau of Land Management.

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— Travel Analysis, cont'd —

The Travel Analysis Process

Each forest must use the Travel Analysis Process (TAP) to identify the minimum road system as well as roads that are no longer needed and should be decommissioned or converted to other uses, such as trails. The analysis must include all Maintenance Level (ML) 1-5 roads. As defined in 36 CFR §212.5(b), the minimum road system is “the road system determined to be needed to meet resource and other management objectives adopted in the relevant land and resource management plan (36 CFR part 219), to meet applicable statutory and regulatory requirements, to reflect long-term funding expectations, [and] to ensure that the identified system minimizes adverse environmental impacts associated with road construction, reconstruction, decommissioning, and maintenance.”

Results from the TAP must be documented in a Travel Analysis Report, and must, per the Forest Service Handbook 7709.55, 20 and the directive memorandum, include:

- A map displaying the recommended minimum road system;
- A list of unneeded roads;
- A list of the key issues;
- A prioritized list of the risks and benefits associated with changing the part of the forest transportation system under analysis;
- A prioritized list of opportunities for addressing those risks and benefits;
- A prioritized list of actions or projects that would implement the minimum road system; and
- A list of proposed changes to current travel management direction, including proposed additions to or deletions from the forest transportation system.

The details of the TAP process are explained in Forest Service Handbook (FSH) 7709.55, Chapter 20. However, it is important to recognize that the TAP itself is not a NEPA process, though the forests have been directed to engage the public in some unspecified way. Information presented in final TAP reports will be incorporated into NEPA processes – such as road system specific proposals, timber projects, or watershed restoration projects – that occur after the TAP is completed. Implementation of the TAP will only happen through these future NEPA processes.

Though the agency did not provide new funding to the field to conduct the TAP analysis, they did provide some significant motivation. The directive memorandum explains that, “(b)eyond FY 2015, no Capital Improvement and Maintenance (CMCM) funds may be expended on NFS roads (maintenance levels 1-5) that have not been included in a TAP or RAP.” Basically, if, by the beginning of FY 2016, a road has not been subject to analysis to determine whether it should stay or go, it cannot be maintained using CMCM funds until it goes through such an analysis. Similarly, starting in FY 2016, if the Forest Service wants to decommission a road but it has not been included in a TAP analysis, they cannot use CMCM funds for that either. Legacy Roads and Trails funds are part of the overall CMCM category. However, there is no proposed prohibition for using other funds, such as fish and wildlife funds, to pay for critical maintenance or road decommissioning if forests do not complete their TAPs in time.



Looking ahead towards the future Forest Service road system. Photo courtesy of Bureau of Land Management.

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Photo by Dan Funsch.

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Recommendations for Engaging in the Process

This new road rightsizing process is a remarkable restoration and stewardship opportunity because the designated road system is the foundation for nearly all management undertaken by the agency. The proposed process is sound but as always the challenge lies in the details. If this rightsizing effort is to live up to its potential, activists need to ensure the Forest Service conducts scientifically rigorous analyses, produces the required products, and, importantly, implements the minimum system strategically and expeditiously once the analysis is complete.

Grassroots and regional engagement will make a big difference in the outcome. We do not yet know what type of public process the agency will be using, because the TAPs are not NEPA analyses (or whether this will vary from region to region and forest to forest). The Wilderness Society (TWS) and Wildlands CPR can provide you with suggested recommendations and a list of tools and examples of good analyses. Please contact Josh Hicks, 303-650-5818 x 107, josh_hicks@tw.society.org; or Adam Rissien, 406-543-9551, arissien@wildlandscpr.org for assistance as your forest begins this process.

Conclusion

The agency has taken an important step by finally setting a timeline for the rightsizing analysis. This analysis will be critical for future Legacy Roads and Trails spending, as well as standard maintenance spending. We look forward to working with the agency and concerned citizens to ensure the process is effective and accurately reflects both the spirit and letter of the November 10 guidance memo and the original 2001 long-term transportation plan. The agency has given us a very nice holiday gift, but it's up to us to use this gift effectively and ensure it reaches its potential!

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