RIGHTSIZING: ACHIEVING AN ECOLOGICALLY SUSTAINABLE FOREST SERVICE ROAD SYSTEM

Travel Management Planning: Subpart A [Roads Rule]

36 CFR 212.5 Road System Management

(b) Road system—

(1) Identification of road system. For each national forest, national grassland, experimental forest, and any other units of the National Forest System (Sec. 212.1), the responsible official must identify the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System lands. In determining the minimum road system, the responsible official must incorporate a science-based roads analysis at the appropriate scale and, to the degree practicable, involve a broad spectrum of interested and affected citizens, other state and federal agencies, and tribal governments.

(2) Identification of unneeded roads. Responsible officials must review the road system on each National Forest and Grassland and identify the roads on lands under Forest Service jurisdiction that are no longer needed to meet forest resource management objectives and that, therefore, should be decommissioned or considered for other uses, such as for trails.

BACKGROUND

The Forest Service road system is oversized, expensive, under-maintained, and environmentally destructive. Laid out end to end, the road system would wrap around the equator 15 times. The Forest Service has a multi-billion dollar road maintenance backlog and, in places, serious road-related water pollution and habitat damage. In National Forests, roads are a leading cause of water pollution. Moreover, because the road system is inadequately maintained, it is not providing safe and reliable access. The road system needs a make-over – it needs to be slimmed down in size and buffed up in quality so that under current budgets it can successfully meet 21st century forest management and access needs (i.e. rightsizing).

In 2001, the Forest Service issued road management regulations referred to as the Roads Rule (see side bar) to address the impacts of this overextended and underfunded forest road system. The Roads Rule directs each forest to identify 1) the minimum system of roads necessary for public and management access, and 2) a list of roads that are no longer needed and ripe for decommissioning.

Note that after the issuance of the Roads Rule forests undertook a Roads Analysis Process to comply with the new rule. However, many forests chose to limit the analysis to roads only open to passenger vehicles, a small subset (usually less than 20%) of the overall road system, and few identified a minimum system or a list of unneeded roads that should be decommissioned.

Since the Roads Rule went into effect more than a decade ago, we are finally beginning to see some activity towards meeting its regulatory mandate. On March 29, 2012 the Forest Service Chief's Office issued guidance explaining that "the agency expects to maintain an appropriately sized and environmentally sustainable road system that is responsive to ecological, economic, and social concerns."

The guidance directs all national forests to complete a Travel Analysis Process (TAP) (replacing the previous Roads Analysis Process) and produce a Travel Analysis Report. It clarifies that Travel Analysis is not a NEPA process; rather, it is the front-end analysis that will inform the development of future proposed actions under NEPA. In other words, completing Travel Analysis is just the first, crucial step towards a sustainable road system.

QUICK GUIDE

Travel Management Planning: Differences Between Subparts A & B

Most National Forests recently completed travel management plans to designate motor vehicle use on specific roads and trails pursuant to Subpart B of 36 CFR 212. A few forests even completed Travel Analysis Reports as a precursor to the travel management planning process, and some travel plan decisions even made changes to the road system by adding or removing roads and trails. So it is easy to confuse Subparts A & B, but they are significantly different.

Regulatory Direction	Product
Subpart B directs that all motorized travel must occur on designated trails, roads, and areas.	A designated system of motorized roads, trails and areas displayed on a Motorized Vehicle Use Map.
Subpart A requires the Forest Service to conduct a science-based travel analysis.	The identification of a minimum road system and a list of unneeded roads for decommissioning.*

** Please note Travel Analysis is just the first step towards Subpart A compliance.*

TRAVEL ANALYSIS REQUIREMENTS

The March 2012 guidance directs each national forest to:

- complete a science-based analysis that will be used to develop proposed actions to identify a minimum road system;
- analyze all maintenance level 1-5 roads (closed roads, high clearance roads, and passenger-vehicle roads);
- include in the report a map that displays both "the roads that can be used to inform the proposed action for identifying the minimum road system and unneeded roads;" and
- complete the process by the end of FY15 (i.e. September 2015).

The consequence for failing to meet the FY15 deadline is that forests cannot expend any funding from the Capital Improvement and Maintenance Budget Line Item (i.e. the agency's main roads budget) on roads that have not been analyzed in a Travel or Roads Analysis Report.

The 2012 guidance also directs the responsible official to review prior Roads Analysis Reports "to assess their adequacy and relevance in terms of Subpart A compliance" in order "to help determine the scope and scale for any new analysis." In other words, information from past Roads Analysis informs the new process, but some forests confuse this direction to mean that past Roads Analysis fulfills all obligations under Subpart A. This is incorrect. In its guidebook, Forest Service Region 5 (CA) clarified this issue explaining:

> *"Most Roads Analysis, completed by the forests in the Region approximately 10 years ago, focused on passenger vehicle roads only. Some forests included high clearance roads in their Roads Analysis, and may feel that they are excluded from the requirement to complete Travel Analysis. However, conditions may have changed since Roads Analysis was completed, with new species added to the Threatened, Endangered, and Sensitive list, severe road maintenance funding reductions, changes in statutory and regulatory requirements, landownership and boundary adjustments, etc. A forest's Roads Analysis is one document that should be reviewed early in the Travel Analysis process, as a reference for past recommendations and opportunities..." (Appendix G, p. 17-18)*

Ultimately, the reason to engage in the Travel Analysis Process is to ensure each national forest describes opportunities and sets priorities for reducing its road system and mitigating impacts from roads that must be retained. Such a rightsized road system will:

- minimize adverse environmental impacts such as disturbances to wildlife habitat including core areas and migration corridors;
- ensure clean water and healthy fisheries;
- provide sustainable access for recreation and other forest management needs; and
- be affordable to manage.

Travel Analysis Synopsis of the Six Step Process

(FSH 7709.55 Ch. 20)

Step 1 – Setting up the Analysis

- Identify the appropriate scope and scale of analysis
- Establish a complete and accurate inventory of NFS roads and motorized trails
- Establish public outreach process

Step 2 – Describing the Situation

- Summarize current travel and land management direction
- Assess existing motorized and non-motorized uses
- Describe public and administrative access needs
- Produce an assessment of available resources to maintain the travel system

Step 3 – Identifying Issues

- Identify major issues, considering public and manager concerns, and legal constraints
- Identify data that will be used to analyze the issues and, if such data is not available, how it will be collected.

Step 4 – Assessing Benefits, Problems, and Risks

- Analyze environmental, social and economic effects of the motorized transportation system
- Analyze risks and benefits of the motorized transportation system

Step 5 – Describing Opportunities and Setting Priorities

- Formulate proposals for changes to the transportation system
- Describe options for modifying the transportation system to achieve desired future conditions as set forth in the LRMP

Step 6 – Reporting

- Information about the analysis and recommendations
- Minimum Road System map
- List of unneeded roads
- Prioritized list of actions to implement the Minimum Road System
- List of proposed changes to current travel management direction

THE TRAVEL ANALYSIS PROCESS - HOW TO ENGAGE

Travel Analysis is divided into 6 steps (see side bar), with Step 4 being the heart of the process. In Step 4, an interdisciplinary (ID) team ranks the risks and values of each road against the issues, or criteria, identified in Step 3. This assessment usually entails assigning a low, moderate or high score to each of the risk/value criteria.

Subpart A and Forest Service directives require the agency to engage the public. However, since travel analysis is not a NEPA process, such involvement is not clearly defined. This means activists will need to be proactive and reach out to the ID team before and during the travel analysis process. For instance:

Meet with the ID Team

- Explain your expectations that an "appropriately sized" road system is one that is both ecologically and economically sustainable, and smaller than what currently exists. *(Based on the draft 2001 EA for the Roads Rule, the Forest Service estimates on average that forests have 10% to 25% more roads than they need and can afford)*.
- Ask who is on the ID Team and urge strong involvement from the forest hydrologist, biologists, and other resource specialists to ensure resource issues are well-considered.
- Ask where the forest is in the process and request a schedule for when each step will be completed. Inform the ID team that you would like to review the issues identified in Step 3 and methods used to assess risks and benefits in Step 4. Also, request an opportunity to review the draft travel analysis report before it is finalized.
- Ask how and when the ID team plans to involve the public; they may need reminding that this is a requirement. Recommend against soliciting information from the public until the team can provide some resource risk information and maps that people can use to contextualize and inform their feedback.
- Provide a copy of The Wilderness Society's report titled Travel Analysis: Best Practices Review. For each of the six steps in the travel analysis process, this review offers good examples from the field.

Review Issues and Analysis Methods

- Before the ID team begins Step 4, review the analysis methods and provide feedback. Are there specific issues that you believe should be analyzed that are not? For example, is the ID team considering the right list of species? Are they adequately considering riparian buffers, impaired streams, sediment delivery and watersheds with streams that provide public drinking water? Is climate change being considered?
- The Wilderness Society has a GIS model, named RoadRight, that can help identify road decommissioning opportunities across the forest, taking into consideration many variables. If you wish to use the model or learn more, contact Josh Hicks; running the model takes time so you should begin as early in the process as possible.

Achieving an Ecologically Sustainable Road System

Once the TAP report is complete, the Forest Service has a variety of ways to implement its recommendations through different projects:

- Urge that projects analyzed under NEPA contain a purpose and need statement to improve sustainability of the motorized transportation system and includes all TAP report recommendations for the project area. However, this approach limits road treatments to only those areas with proposed projects; roads outside of project areas would be left untreated.
- Urge line officers to conduct a landscape-scale project to restore lands and waters from road impacts by proposing to implement all TAP report recommendations within the project area. Then as funding becomes available the forest would have shovel-ready projects ready to implement.
- Under the Watershed Condition Framework, forests identify priority watersheds and develop Watershed Restoration Action Plans. Ensure each new action plan includes the travel analysis report recommendations for that watershed.
- Forests must revise their land management plans every 10 to 15 years. When your forest is starting a revision, ensure that the TAP report is included in the assessment phase, and is used to help inform the revision process.

For more information contact:

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THE TRAVEL ANALYSIS PROCESS - HOW TO ENGAGE

Review Assessment & Offer Recommendations

- Once Step 4 is complete, the forest will have a risk/benefit assessment spreadsheet that it will use to determine unneeded roads and set priorities for management action. It is our position that all unneeded roads should be decommissioned. In the absence of specific road recommendations, use the following general categories:
  - Low Value/High Risk - Unneeded. High priority for decommissioning;
  - Low value/Low Risk - Uneeded. Lower priority for decommissioning, (often the agency does not recommend decommissioning these road because they are not posing a high risk to the environment, but this rating should not preclude them from being added to the list for eventual removal);
  - High Value/High Risk - High priority for mitigation.
- When reviewing the assessment look for unusual scores. For example, if all roads ranked high for vegetation management, ask the ID team for an explanation.
- If you have specific road recommendations, meet with the ID team to go over each one and explain your rationale. Otherwise use the general categories above as a basis for your recommendations.
- If you used RoadRight, present your findings (we have powerpoint samples) and urge the agency to incorporate them into the final report.

Report Review

- Ask for a review period of the draft TAP report and consider writing a letter that focuses on those areas that, if changed, would have the biggest impact. After you write your letter, meet with the agency to go over your concerns. Note, since this is not a NEPA process, the agency is not required to issue a formal notice or provide opportunities for review, but they are supposed to involve the public.
- Issues to consider as you review the TAP Report:
  - Does the report include a map of unneeded roads, and did it adequately use a science based analysis, both of which are required components of Travel Analysis?
  - Is there a fiscal analysis that shows how long-term budget expectations can be balanced? Did the agency use the fiscal analysis to inform the management recommendations (e.g. recommend decommissioning of unneeded roads to lower long-term maintenance costs)?
  - What is the agency planning to do with roads that score low risk/low value? Recommend the final report list them as unneeded and candidates for decommissioning.
  - Are there particular roads that concern you? If so, review the analysis to see how they ranked. Provide feedback to the Forest Service if you believe there are elements in the risk/value/cost assessment that are incorrect.