

Santa Fe National Forest Travel Management Planning
Explanation of Differences between
the July 2008 Proposed Action and the Corrected Proposed Action

Memorandum to File

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/s/ Julie Bain, Travel Management Project Leader

Purpose: This document explains the differences between the Santa Fe National Forest’s July 2008 “Proposed Action for Managing Motorized Travel” and the Corrected Proposed Action in the draft environmental impact statement.

Because the July 2008 Proposed Action was based on data in the Travel Analysis Process Report, this document also updates the TAP Report and any documents associated with it, in particular “Documentation of Assumptions, Process, and/or Logic Used for Existing Direction, Existing Condition, and the Proposed Action” dated August 27, 2008.

I. Change in Overall Approach

Two reasons exist for the changes described here. First, Forest staff’s understanding of the nuances associated with travel management planning has increased in the 18 months since the release of the July 2008 Proposed Action. The July 2008 document proposed to designate a system open to motorized travel, whereas the Corrected Proposed Action proposes *changes* to the current designated system. Second, fieldwork conducted by Forest personnel has refined the alignments and mileages of routes.

Current Designated System: The current designated system comprises all written and electronic information that currently exists pertaining to roads, trails, areas, and fixed distance corridors (Table 1).

Table 1. Summary of sources of the Forest’s designated route system.

<i>Type</i>	
Written	Santa Fe National Forest Land and Resource Management Plan and ORV Map, Closure Orders, NEPA documents for specific road or trail projects
Electronic	INFRA databases (Roads, Trails)

The scoping document titled “Proposed Action for Managing Motorized Travel” (July 2008) described the Santa Fe National Forest’s Existing Direction. Pages 7 and 9 of the scoping document state the Forest does not have a designated system of roads or trails, respectively; this is incorrect (70 FR 68268). The current designated system is the same as the Existing Direction, pursuant to regional guidance (Dec. 3, 2009 notes, Topic 10; June 2008 Regional Guidance). Table 2 shows the current designated system. This

table updates the Existing Direction described in the Travel Analysis Process Report (July 2008). Table 2 incorporates updated information from fieldwork, database corrections, and refined interpretations based on analysis that is more complete.

Table 2. Summary of the current designated system (Existing Direction).

<i>Element of Designated System</i>	<i>Miles or Acres Considered Currently Designated, rounded to the nearest mile</i>	<i>Source</i>
Roads	4,650 miles managed as open to motorized use by the public, for administrative purposes, or both	Infra [Open system, from table GEN05b (attached)]; closure orders; Forest Plan
Trails	27 miles managed as open to motorized use	Infra [Closed system/moto trail, decommissioned/moto trail, motorized trail, open system/moto trail, undetermined/moto trail from table GEN05b (attached)]; closure orders; Forest Plan
	459 miles of system trails located outside of wilderness – on most, motorized use is not prohibited and not discouraged	Infra [Table GEN05b (attached)]; closure orders; Forest Plan
Areas	821,664 acres (53%) where motorized cross-country travel is not prohibited	Forest Plan; closure orders
Motorized Dispersed Camping	821,664 acres (53%) where motorized cross-country travel is not prohibited. Of this, 22,103 acres described in the Forest Plan (ORV map) as available for parking and camping.	Forest Plan; closure orders
Motorized Big Game Retrieval	821,664 acres (53%) where motorized cross-country travel is not prohibited	Forest Plan; closure orders

July 2008 Proposed Action: The July 2008 scoping document proposed to designate a system open to motorized travel (Table 3), following the language of the Travel Management Rule (§ 212.51). The 2008 Proposed Action briefly discussed the changes to the current designated system (pp. 22, 25), but its focus was describing the designated system in its entirety.

Table 3. Proposed designated system, July 2008. Taken from scoping document (p. 19).

Category	Proposed Action
Roads available for motorized use	2,309 miles
Trails available for motorized use	247 miles ¹ ATVs and motorcycles = 105 miles Motorcycles only = 142 miles
Acres available for motorized cross-country use	50 acres (less than 0.01%) of areas 21,099 acres (1.4 %) of dispersed camping corridors
Motorized access to dispersed camping	508 miles of road with a corridor 8 miles of trail with a corridor
Motorized access to retrieve downed game	No corridors specifically for big game retrieval

Issues and Concerns Raised: The wording of the issues and concerns raised by the public reflect the scoping document’s focus on the designated motorized system in its entirety. For example, one issue is “Continued public motorized use of routes and areas described in the proposed action will adversely affect forest resources.”

Had the 2008 Proposed Action focused on the *changes* to the current designated system, the issues may have emerged differently. In the example just used, two scenarios are possible. First, no issue may have arisen because the focus on the *reduction* in routes would have eliminated the concern. Or, the issue may have stated that the proposed reductions were insufficient, as in, “The reduction in motorized routes does not go far enough to protect forest resources.”

Corrected Proposed Action: The Corrected Proposed Action presented in the draft environmental impact statement will focus on the *changes* to the current designated system, pursuant to guidance from staff in the Southwestern Regional Office. Section 212.50(b) of the Travel Management Rule states, “The responsible official may incorporate previous administrative decisions regarding travel management made under other authorities, including designations and prohibitions of motor vehicle use, in designating National Forest System roads, National Forest System trails, and areas on National Forest System lands for motor vehicle use under this subpart.” This means that those aspects of the current designated system that are acceptable do not have to be revisited or re-designated.

¹ In addition, 2,040 miles of the 2,309 miles of roads proposed for designation would permit motorcycle and ATV use.

Described as an equation, it would look like this:

		Example
1		Current designated motorized system
2	(+)	<i>New designated motorized routes</i>
3	(-)	<i>Existing routes not designated</i>
4	=	New designated motorized system

Decision Framework: The NEPA decision will be on the changes to the current designated system, represented by the text in rows 2 and 3 in the equation above. The changes will result in a new designated system, represented by line 4 in the equation above.

Effects Analysis: While the NEPA decision is on the *changes* to the current designated system, the effects analysis is best described in terms of the changes to the designated system in its entirety. The description of the entire system provides context. For example, if the action is to designate 50 miles of motorized trail, it is helpful to know if the total miles of trail would then be 51 miles, or 650 miles – a large difference in context.

Terminology: The phrase “motorized cross-country travel” means to drive a motor vehicle off a road. Motorized cross-country travel will be allowed in designated areas and in fixed distance corridors. In the latter, §212.51 provides the option of “limited use of motor vehicles within a specified distance of certain designated routes, and if appropriate within specified time periods, solely for the purposes of dispersed camping or retrieval of a downed big game animal by an individual who has legally taken that animal.” Thus, in corridors, motorized cross-country travel is *limited* and *solely* for the purposes listed. In designated areas, however, no restrictions on motorized use exist (70 FR 68274; FSM 7715.73(8)).

II. Specific Changes

Forest staff’s understanding the nuances of travel management planning has increased in the 18 months since the release of the July 2008 Proposed Action, resulting in several specific changes to the July 2008 Proposed Action. Changes to the Proposed Action are provided for in 36 CFR 220.5(e)(1), which allows the Responsible Official to modify the proposed action prior to issuing a draft environmental impact statement.

The following list describes specific changes between the text in the July 2008 Proposed Action (shown in *italics*) and the Corrected Proposed Action.

Page 4 - The purpose of this project is to designate a system of roads, trails, and areas open to motor vehicle use by the public by class of vehicle and time of year on the Santa Fe National Forest.

Change: The purpose of this project is to comply with the Travel Management Rule by providing a system of roads, trails, and areas designated for motor vehicle use by class of vehicle and time of year on the Santa Fe National Forest (36 CFR 212.50).

Reason for change: Previous designations need not be re-visited. The Forest is proposing changes to the current designated system.

Page 7 – Routes on private land were included in the calculation of open public road density. This is also stated in the TAP Report, p. 12.

Change: Routes on private land were not included in the calculation of open public road density for the draft environmental impact statement.

Reason for change: The Forest Plan's standards and guidelines do not apply to private land, pursuant to guidance from the Regional Planner.

Page 9 – States the forest has 937 miles of system trail.

Change: The Forest manages 948 miles of system trails.

Reason for change: Fieldwork and database corrections.

Page 10 - During the travel analysis process, the public provided, either electronically or by drawing on maps, approximately 993 miles of new routes they wanted to have designated. Of these, approximately 316 miles were actually new, meaning they were not part of the Forest's current road inventory.

Change: People who ride motor vehicles provided approximately 1,124 miles of routes they like to drive on as of the time of this writing. Approximately 329 miles of these are not part of the transportation system.

Reason: After the release of the Proposed Action, people continued to submit electronic files showing places they liked to ride motorized vehicles.

Page 10 - Santa Fe National Forest staff estimate that the public is currently using approximately 4,477 miles of roads (TAP report, p. 10).

Change: Alternative 1 (No Action) shows 5,119 miles of roads currently being used by the public.

Reason for change: To facilitate comparison between the existing condition and the proposed alternatives, the existing condition must be mapped (Existing Condition Description, project record). All the roads the Forest manages as open can be mapped. The 4,477 miles cited in the TAP report is likely more accurate; however, these miles cannot be mapped as explained in the TAP report on page 10.

Page 15 – Describes existing miles of motorized dispersed camping.

Change: The draft environmental impact statement updates the miles and acreage used for motorized dispersed camping.

Reason for change: Field work inventorying motorized dispersed campsites in 2008 and 2009.

Page 16 – Describes potential maximum amount of big game retrieved with a motor vehicle.

Change: The document titled “Existing Condition Description” refines the number of harvested animals thought to be retrieved by motor vehicle.

Reason for change: An additional year of harvest data became available. The interdisciplinary team concluded that having an average number of trips was a more accurate representation of use of the forest. To arrive at an average, assumptions were made as described in the above-referenced document.

Page 22 – Describes the changes needed to arrive at a designated road system of 2,309 miles.

Change: The changes and resultant designated system have been updated and result in a different figure.

Reason for change: Field work, refinements in analysis, and database corrections.

Page 22 - Approximately 982 miles of roads would be kept for periodic administrative use only by the Forest Service and its permittees, but would be closed to the public. The Forest has identified approximately 3,239 miles as unneeded (TAP report, pp. 36-37).

Change: Approximately 1,428 miles of roads will be kept for periodic administrative use by the Forest Service and its permittees, but closed to the public (TAP, p. 37).

Reason for change: The 982 mile figure was just the Maintenance Level 2 administrative use roads and did not include the Maintenance Level 1 roads, which are planned for retention as system roads, but not for current administrative use. These roads will be used for administrative use some time in the future and would be changed to ML 2 roads during the time they are being used, so it is more accurate to include them as roads for administrative purposes.

Page 25 – Describes the changes needed to arrive at a designated motorized trail system of 247 miles.

Change: The changes and resultant designated system have been updated and result in a different figure.

Reason for change: Fieldwork, correction in text, refinements in analysis, and database corrections.

Page 26 – Describes the proposed acreage of designated areas.

Change: The changes and resultant designated areas have been updated and result in a different figure.

Reason for change: Field work.

Page 27 - No corridors to retrieve big game with a motorized vehicle are being proposed.

Change: Corridors to retrieve big game have been added to the Corrected Proposed Action.

Reason for change: Some people requested motorized access to retrieve downed big game. By adding minimal motorized big game retrieval corridors to the Corrected Proposed Action, the Forest would be able to show the effects of a mid-range proposal. Alternative 3 proposes no corridors whatsoever, and Alternatives 4 and 5 provide larger corridors.

Page 28, Decision Framework - Based on the environmental analysis, the forest supervisor will decide 1) which roads, trails, and areas will be designated for motorized use by the public by vehicle class and time of year; 2) where to designate motorized access for dispersed camping; and 3) whether and where to designate motorized access to retrieve downed game; and 4) what forest plan amendments to adopt.

Change: The Decision Framework focuses on the changes to the current designated system, as described earlier in this document.

Reason for change: Previous administrative decisions need not be re-visited.

The summary table from the scoping document (p. 19) has been completely updated based on refined analysis and assumptions. The changes are shown in the table below.

Table 4. Summary of Changes in Miles Listed for Existing Direction, Existing Condition, and Proposed Action between July 2008 and the time of this writing.

	July 2008 Proposed Action, p. 19	Draft Environmental Impact Statement	Reason for Change
ROADS			
Existing Direction	4,924	4,650	Corrections in Infra database.
Existing Condition (Alt 1)	4,447	5,119	Cannot map the roads in July 2008 proposal.
Proposed Action (Alt 2)	2,309	2,290	Corrections in Infra database.
TRAILS			
Existing Direction	300	486	More accurate to list all system trails outside wilderness since motorized travel on most of them is not prohibited or discouraged.
Existing Condition (Alt 1)	Up to 591	339	More accurate information of where people are driving since the July 2008 proposed action.
Proposed Action (Alt 2)	247	262	Corrections based on public comment and fieldwork.
AREAS			
Existing Direction	821,644	821,644	
Existing Condition (Alt 1)	250,400	443,848	Corrections from districts, particularly Espanola
Proposed Action (Alt 2)	50	40	Field work
MOTORIZED DISPERSED CAMPING			
Existing Direction	4,924 miles of road 300 miles of trail	821,644 acres 5,136 miles	Corrections to Infra database
Existing Condition (Alt 1)	450 to 600 miles of roads and trails	17,076 acres 433 miles	2008-2009 dispersed camping field inventory
Proposed Action (Alt 2)	508 miles of road 8 miles of trail 21,099 acres of corridors	16,340 acres 423 miles	2008-2009 dispersed camping field inventory
MOTORIZED BIG GAME RETRIEVAL			
Existing Direction	508 miles of road 8 miles of trail 821,622 acres	821,644 acres 5,136 miles	Corrections to Infra database

	July 2008 Proposed Action, p. 19	Draft Environmental Impact Statement	Reason for Change
Existing Condition (Alt 1)	No data	1,266,910 acres 5,192 miles	The acreage outside of wilderness areas corresponds with the method used to calculate animals taken. It is likely high.
Proposed Action (Alt 2)	No corridors	16,340 acres 423 miles	Alternative 2 lent itself best to a mid-range proposal for fixed-distance corridors.

Existing Direction/Condition	Grand Total	Alt 1			Alt 2			Alt 3			Alt 4			Alt 5		
		Road	Trail	Not Designated	Road	Trail	Not Designated	Road	Trail	Not Designated	Road	Trail	Not Designated	Road	Trail	Not Designated
Closed System	1328.7	139.9	8.0	1180.8	66.0	48.2	1214.5	40.7	12.0	1276.0	119.0	79.9	1129.8	80.0	57.9	1190.8
Closed System/Moto Trail	3.5	3.5	0.0	0.0	0.0	3.5	0.0	0.0	0.0	3.5	0.0	3.5	0.0	0.0	0.0	3.5
Decommissioned	327.5	31.4	0.6	295.5	18.2	8.1	301.2	9.5	0.0	318.0	19.9	13.2	294.4	18.8	13.6	295.1
Decommissioned/Moto Trail	0.4	0.3	0.2	0.0	0.0	0.2	0.2	0.0	0.0	0.4	0.0	0.2	0.2	0.0	0.2	0.2
Motorized Trail	18.7	7.7	11.0	0.0	0.0	11.7	6.9	0.0	2.1	16.6	0.0	11.7	6.9	0.0	10.0	8.7
Non-System	435.1	112.5	0.0	322.6	88.2	0.6	346.3	81.4	0.0	353.7	88.0	1.9	345.2	95.8	0.6	338.6
Non-System Closed	22.8	1.8	0.0	21.0	2.2	0.0	20.6	2.2	0.0	20.6	2.8	0.0	20.0	2.2	0.0	20.6
Open System*	4650.2	4648.5	0.3	1.3	2079.3	101.4	2469.4	1668.4	37.6	2944.1	2262.5	199.0	2188.7	1997.9	130.3	2521.9
Open System/Moto Trail	3.5	3.5	0.0	0.0	1.7	1.7	0.1	1.7	0.0	1.8	1.7	1.7	0.1	1.7	1.7	0.1
System Trail**	33.6	0.0	26.7	6.9	0.0	7.9	25.7	0.0	0.0	33.6	6.5	26.1	1.0	0.0	18.8	14.8
Unauthorized Route	328.6	14.3	290.5	23.9	23.2	67.6	237.8	19.4	0.0	309.3	32.7	109.3	186.6	25.7	57.4	245.6
Undetermined	265.6	154.6	1.2	109.7	11.0	10.5	244.1	5.7	0.0	259.9	15.5	14.4	235.7	8.9	14.0	242.6
Undetermined/Moto Trail	0.9	0.9	0.0	0.0	0.0	0.9	0.0	0.0	0.9	0.0	0.0	0.9	0.0	0.0	0.9	0.0
Grand Total	7418.9	5118.6	338.6	1961.7	2289.8	262.3	4866.8	1829.0	52.6	5537.3	2548.7	461.6	4408.5	2231.0	305.3	4882.6

"/Moto Trail" are roads that are coincident with one of our existing system motorized trails; these were merged into one line so the mileage would not be double counted.

* 1.3 miles of Open System not designated in Alt 1: 446H,151N,151Q are mistakes that should have been designated - these were roads that were corrected in Infra to Open System but I failed to change Alt 1 to a designated road; 419AA,435GD,309F,534DL were "hanging" or "stranded" roads - roads leading to them were closed, but Infra still showed these roads as open - these are apparently mistakes in Infra.

** System Trail: the Forest has over 900 miles of system trails, but these trails are ones that are being designated in an alternative &/or were trails that were submitted by user groups as trails they currently ride on.