



Travel Management Rule – Subpart A Frequently Asked Questions

July 2012

Subpart A Questions

1Q. What does Subpart A require the Forest Service to do?

A. The National Forest System road system is critical in meeting the diverse needs of the public and managers of national forests and grasslands. Subpart A of the Travel Management Rule directs the Forest Service to identify the most ecologically, economically and socially sustainable road system in terms of access for recreation, research and other land management activities.

2Q. When are the requirements of Subpart A met for an administrative unit?

A. Subpart A is met for an administrative unit when the requirements in 36 CFR 212.5(b) are completed. There is no due date for the completion of Subpart A as it is linked to available funding. However, there is a requirement that the Travel Analysis Report be completed by the end of Fiscal Year 2015.

3Q. What is the difference between the Travel Analysis Process (TAP) and Travel Analysis Report (TAR)?

A. The TAP is a process (see follow questions) that results in the TAR.

4Q. Why are we doing Subpart A after Subpart B?

A. Some units are addressing both at the same time. The Travel Management Rule does not establish the order or a timeline for implementing Subparts A and B. However, the Forest Service prioritized designation of roads, trails, and areas for motor vehicle use (Subpart B), as the priority to stop uncontrolled cross-country motor vehicle use on National Forest System lands to protect natural and cultural resources.

5Q. Don't Subpart A and Subpart B do the same thing?

A. Subpart A has a broad mandate to identify roads needed (and therefore, also identify roads no longer needed) to administer NFS lands. Subpart B's mandate is much narrower: to determine where and, if appropriate, when motor vehicles may be operated, subject to specific exemptions. The focus of Subpart A is on roads as infrastructure (see 36 C.F.R. § 212.1 which defines forest roads as "forest transportation facilities"). In contrast, the focus of Subpart B is on recreational use of roads, trails and areas, and to stop uncontrolled cross-country motorized travel.

Travel Analysis Process (TAP) and Travel Analysis Report (TAR) Questions

6Q. Is NEPA required for the TAP and TAR?

A. No. Neither the TAP nor TAR make decisions.

7Q. What are the required steps for completing a TAR and who conducts it?

A. See FSH 7709.55, chapter 20 for required steps. In addition, as a part of the TAR, the results must include:

- A map displaying all system roads that differentiates between those roads which will potentially remain and those that might be removed or changed. The map will be used to inform future proposed actions subject to National Environmental Policy Act (NEPA) compliance; and
- Information about the analysis as it relates to the criteria found in 36 CFR 212.5(b)(1).

Resource specialists from a variety of disciplines such as engineers, botanists, soils scientists, geologists, hydrologists, silviculturalists, biologists, social scientists, recreation planners, landscape architects and economists may be included on an interdisciplinary team to conduct the TAP and TAR.

8Q. Will the TAR include a decision on whether or not roads will be closed or change their status?

A. No. The TAR does not make road closure decisions or any other on-the-ground decision. The Report is meant to inform Forest leadership of opportunities for future projects or decisions that involve those roads.

9Q. Does the public get to voice its opinion or provide comments during the TAP?

A. Yes. Opportunities for public involvement are an integral part of the travel analysis process. Line officers should involve a broad spectrum of interested and affected citizens, local, State, and Federal agencies, as well as tribal governments. See FSH 7709.55, chapter 20 for guidance on when to provide opportunities for public involvement.

10Q. When will the TAR be completed?

A. Each administrative unit is required to complete a TAR by the end of fiscal year (FY) 2015 (September 30, 2015). Beyond 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.

11Q. Do previous analyses need to be “re-visited” under TAP?

A. For administrative units that have previously conducted travel analysis or roads analysis (RAP), the appropriate line officer should review the prior analysis to: 1) assess the adequacy of the analysis in complying with 36 CFR 212.5(b); 2) help determine the appropriate scope and scale for any new analysis; and 3) build on previous work to ensure requirements of Subpart A are met. If they have not been met then managers are to supplement previous analyses to fulfill the requirements of the travel management rule.

12Q. Does TAP apply to routes not under the jurisdiction of the Forest Service such as county or state routes that cross Nation Forest System (NFS) land?

A. No. TAP only applies to NFS routes. TAP does include those roads under special use permits.

13Q. Must administrative units include unauthorized (user-created) roads in TAP?

A. No. The responsible official may want to consider some unauthorized routes but he or she is not required to do so.

14Q. Will motorized trails be included in this travel analysis process?

A. No. This travel analysis process does not require addressing the existing motorized trail system or unauthorized routes.

15Q. How does Subpart A relate to Land Management Planning (36 CFR 219)

A. The TAP and its resulting TAR are mechanisms for assessing an administrative unit's infrastructure. They will be used to inform land management planning decisions.

Decisions to Identify and Implement the MRS

16Q. Is there a difference between identifying the MRS and implementing the MRS?

A. Administrative units make NEPA decisions on proposed actions informed by the TAR. Identifying and implementing activities that move units toward the MRS ultimately result in the same outcome, ecologically, economically and socially sustainable roads systems.

17Q. What value does a unit gain from identifying a MRS?

A. The primary value is management and sustainability of a road system that minimizes adverse environmental impacts by assuring roads are in locations only where they are necessary to meet access needs, and can be maintained within budget constraints.

18Q. What are the criteria for the MRS

A. The criteria for the MRS that must be met are:

- Meet resource and other management objectives adopted in the relevant land and resource management plan;
- Meet applicable statutory and regulatory requirements;

- Reflect long-term funding expectations;
- Ensure the identified roads system minimizes adverse environmental impacts associated with road construction, reconstruction, decommissioning, and maintenance.

Other

19Q. Are any changes to the directives for Subpart A planned?

A. Currently no changes to the directives regarding Subpart A are planned.

20Q. Can a road be decommissioned prior to identifying the MRS?

A. Yes. There is nothing in policy that would preclude decommissioning a road before identifying the MRS.

21Q. How will progress toward implementing Subpart A be tracked?

A. A method of tracking progress toward completion of the TAR is under development. However, MRS progress will be tracked annually using the Forest Service Infrastructure database.

22Q. What are the scales for travel analysis and for identifying the MRS?

A. Generally the TAR should be completed at the ranger district or unit level (see FSM 7712.1). The TAR will be used to inform future travel management decisions.

Proposed actions which move the administrative unit toward the MRS generally should be developed at the 6th code subwatershed or larger scale. These proposed actions and alternatives are subject to environmental analysis and decision-making in accordance with the NEPA.

Travel analysis and identification of the MRS could be done at the same scale, if that scale is at the ranger district or unit level.

23Q. What is the flowchart included in the March 29, 2012 letter meant to display?

The flowchart is intended to show the relationship between WCF steps and Subpart A travel management rule steps. NEPA is not required for TAP or the assessment component of the WCF. NEPA is required when making decisions on proposed actions informed by these processes. It is also intended to show that completion of the TAR is required by FY 2015.