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Date: March 29, 2012

Route To:

Subject: Travel Management, Implementation of 36 CFR, Part 202, Subpart A (36 CFR 212.5(b))

To: Regional Foresters, Station Directors, Area Director, IITF Director, Deputy Chiefs and WO Directors

This letter is to reaffirm agency commitment to completing a travel analysis report for Subpart A of the travel management rule by 2015 and update and clarify Agency guidance. This letter replaces the November 10, 2010, letter on the same topic.

The Agency expects to maintain an appropriately sized and environmentally sustainable road system that is responsive to ecological, economic, and social concerns. The national forest road system of the future must continue to provide needed access for recreation and resource management, as well as support watershed restoration and resource protection to sustain healthy ecosystems.

Forest Service regulations at 36 CFR 212.5(b)(1) require the Forest Service to identify the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System (NFS) lands. In determining the minimum road system, the responsible official must incorporate a science-based roads analysis at the appropriate scale. Forest Service regulations at 36 CFR 212.5(b)(2) require the Forest Service to identify NFS roads that are no longer needed to meet forest resource management objectives.

Process

Travel analysis requires a process that is dynamic, interdisciplinary, and integrated with all resource areas. With this letter, I am directing the use of the travel analysis process (TAP) described in Forest Service Manual 7712 and Forest Service Handbook (FSH) 7709.55, Chapter 20. The TAP is a science-based process that will inform future travel management decisions. Travel analysis serves as the basis for developing proposed actions, but does not result in decisions. Therefore, travel analysis does not trigger the National Environmental Policy Act (NEPA). The completion of the TAP is an important first step towards the development of the future minimum road system (MRS). All NFS roads, maintenance levels 1-5, must be included in the analysis.

For units that have previously conducted their travel or roads analysis process (RAP), the appropriate line officer should review the prior report to assess the adequacy and the relevance of their analysis as it complies with Subpart A. This analysis will help determine the appropriate scope and scale for any new analysis and can build on previous work. A RAP completed in accordance with publication FS-643, "Roads Analysis: Informing Decisions about Managing the



National Forest Transportation System,” will also satisfy the roads analysis requirement of Subpart A.

Results from the TAP must be documented in a **travel analysis report**, which shall include:

- A map displaying the roads that can be used to inform the proposed action for identifying the MRS and unneeded roads.
- Information about the analysis as it relates to the criteria found in 36 CFR 212.5(b)(1).

Units should seek to integrate the steps contained in the Watershed Condition Framework (WCF) with the six TAP steps contained in FSH 7709.55, Chapter 20, to eliminate redundancy and ensure an iterative and adaptive approach for both processes. We expect the WCF process and the TAP will complement each other. The intent is for each process to inform the other so that they can be integrated and updated with new information or where conditions change. The travel analysis report described above must be completed by the end of FY 2015.

The next step in **identification** of the MRS is to use the travel analysis report to develop proposed actions to **identify** the MRS. These proposed actions generally should be developed at the scale of a 6th code subwatershed or larger. Proposed actions and alternatives are subject to environmental analysis under NEPA. Travel analysis should be used to inform the environmental analysis.

The administrative unit must analyze the proposed action and alternatives in terms of whether, per 36 CFR 212.5(b)(1), the resulting road system is needed to:

- 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 that the identified system minimizes adverse environmental impacts associated with road construction, reconstruction, decommissioning, and maintenance.

The resulting decision identifies the MRS and unneeded roads for each subwatershed or larger scale. The NEPA analysis for each subwatershed must consider adjacent subwatersheds for connected actions and cumulative effects. The MRS for the administrative unit is complete when the MRS for each subwatershed has been identified, thus satisfying Subpart A. To the extent that the subwatershed NEPA analysis covers specific road decisions, no further NEPA analysis will be needed. To the extent that further smaller-scale, project-specific decisions are needed, more NEPA analysis may be required.

A flowchart displaying the process for identification of the MRS is enclosed with this letter.

Timing

The travel analysis report **must be completed by the end of FY 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.

Leadership

The Washington Office lead for Subpart A is Anne Zimmermann, Director of Watershed, Fish, Wildlife, Air and Rare Plants. Working with her on the Washington Office Steering Team are Jim Bedwell, Director of Recreation, Heritage, and Volunteer Resources, and Emilee Blount, Director of Engineering. I expect the Regions to continue with the similar leadership structures which have been established.

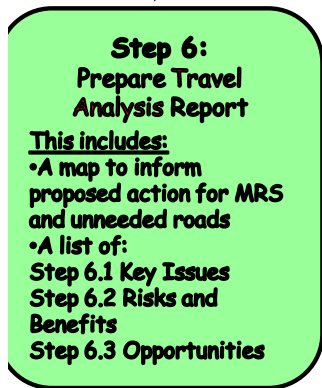
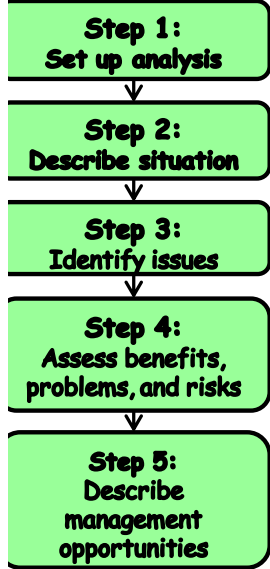
Your leadership and commitment to this component of the travel management rule is important. Together, we will move towards an ecologic, economic, and socially sustainable and responsible national road system of the future.

/s/ James M. Pena (for):

LESLIE A. C. WELDON

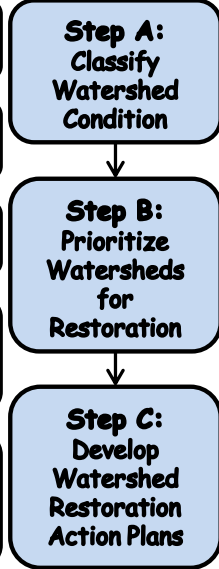
Deputy Chief, National Forest System

TAP Pre-NEPA

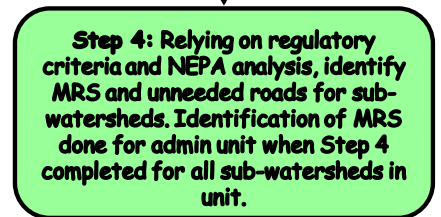
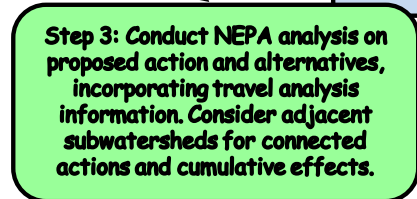
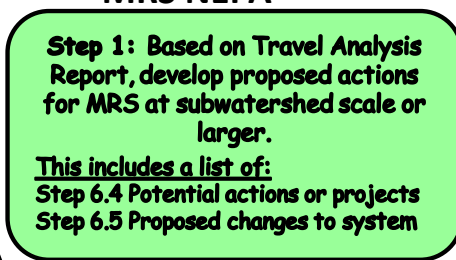


TAP steps to be completed by end of FY 2015

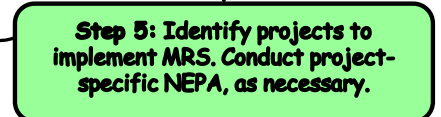
WCF Pre-NEPA



MRS NEPA



Subpart A is Satisfied



WCF NEPA

