

## Attachment 5

### Frequently Asked Questions and Answers

**Q: What is Comprehensive Travel and Transportation Management (CTTM)?**

A: CTTM planning addresses in an interdisciplinary way all resource values and uses (recreational, traditional, commercial, authorized, and others) and includes all modes (motorized, mechanized, nonmotorized, and nonmechanized) of access and travel on the public lands.

The goals of travel management are to:

- Provide and improve sustainable access for public needs and experiences;
- Protect natural and cultural resources and settings;
- Promote the safety of public land users; and
- Minimize conflicts among the various users of public lands.

**Q: Why is it called Comprehensive Travel and Transportation Management rather than travel management?**

A: Historically, the travel and transportation programs have been segmented between two programs, engineering (transportation) and recreation (travel). There are extensible, interrelated management and public access implications. It is imperative that the BLM manage transportation and travel systems in a holistic, interdisciplinary context, giving consideration to all resource values and uses that it manages.

**Q: What is a Travel Management Area (TMA)?**

A: A TMA is a planning tool for identifying a sub-unit of the planning area where unique travel management (either motorized or nonmotorized) circumstances result in the need for particular focus and additional analysis (a TMA is not an allocation or a land use decision). Field Offices can use a TMA to separate a specific area from the rest of the planning area for a variety of reasons, which may include complexity, the need for a higher level of public involvement, or special resource characteristics. It may be that the road and trail decisions in a TMA need to be deferred and addressed at a later date. If so, a TMA is still required to have an OHV area designation. This allows Field Offices to move forward and make road and trail selections for the transportation network in the rest of the planning area. Some Field Offices will have no Travel Management Areas.

TMA's are polygons or delineated areas where a rational approach has been taken to classify areas as open, closed, or limited, and have identified or designated network of roads, trails, ways, and other routes that provide for public access and travel across the planning area. All designated travel routes within TMA's should have a clearly identified need and purpose, as well as clearly defined activity types, modes of travel, and seasons or timeframes for allowable access or other limitations.

**Q: Do TMAs cover entire planning areas?**

A: Field Offices may delineate TMAs where there is a need. In some instances, Field Offices may decide to put all the planning acres into one or more TMAs. In other instances, Field Offices may have no TMAs or TMAs for areas where there are no other overriding resources objectives set. The following are examples of where TMAs may or may not be delineated in the RMP:

*EXAMPLE: Could Field Offices manage travel and transportation differently for Areas of Critical Environmental Concerns (ACEC), Special Recreation Management Areas (SRMA), Wilderness Study Areas (WSA), areas with oil and gas production focus, or wildlife management areas to achieve specific land use objectives? In instances where the Manager decides travel and transportation should be managed differently, these areas could have a different corresponding TMA (possibly with different OHV designations) that provide for public and administrative access. Note: Land use plans that have many specific landscape objectives and management prescriptions may need to delineate several TMAs. However, there will be times when the prescriptions for the ACEC, SRMA, or WSA could also meet the travel and transportation management needs of the area. Note: Land use plans that are broad will probably have fewer TMAs.*

*EXAMPLE: If both an ACEC and a SRMA are managed the same, allowing cross-country foot or horse travel and limited to designated route travel for mechanized conveyances and OHVs, could they fall into one TMA? Yes. It is likely the limited route designation criteria will vary because of the varying land use objectives in each. This variation could cause similar routes to be open in a SRMA and closed in an ACEC. If having different TMAs helps to explain to the public limited route designation or helps in planning and management, it may be beneficial to have separate TMAs.*

*EXAMPLE: What if there are SRMAs with several Recreation Management Zones (RMZ)? As per H-1601-1, each RMZ has a different recreation management objective. Presumably, then each RMZ would probably need to manage travel and transportation differently to achieve the individual RMZ objectives. Each RMA would require a separate TMA, and the boundaries of the TMAs would be the same as the RMZs.*

**Q: Are TMAs different from open, limited, closed, and OHV areas?**

A: TMAs include OHV area designations as required by 43 CFR 8342.1. Additionally, OHV area designations only address motorized use, and a TMA should address all forms of travel and transportation.

**Q: What happens if road and trail designations are not completed in the RMP?**

A: It is the BLM's policy that all travel management planning is accomplished during the RMP process when time and resources allow. The goal should be to make as many road, primitive road, and trail designations in the RMP as possible. For the "limited" areas with complex or controversial issues needing further input and analysis that cannot

be resolved with the completion of the RMP or Final Environmental Impact Statement (EIS), refer to IM 2004-005 and Attachment 2 in this IM. Separate Travel and Transportation Management Plans identifying existing or designated routes are required to be completed within 5 years of the signing of the ROD.

**Q: Can route designations and decisions in a portion of the planning area be deferred until after the RMP?**

A: Yes. Because of complexity, level of controversy, or other reasons, some of the route decisions in the planning area can be deferred to a future travel management plan. The area that is deferred should be delineated as a TMA. See LUP Handbook (H-1601-1), Appendix C, Section II. D.

**Q: Can you designate routes in Wilderness Study Areas (WSA)?**

A: Yes, but the designated motorized route can only be a “way” that existed inside the WSA and was identified during the inventory phase of the wilderness review. Motorized use of these “ways,” however, is not permitted to impair the wilderness suitability of the area. Trails for foot and stock use can be designated.

**Q: Can you close an existing way in a WSA?**

A: Yes. You can close the entire WSA to motorized use, or you can designate routes as noted above.

**Q: Can you have a designated trail in a closed area?**

A: Yes, if the trail is nonmotorized and the area is closed to motorized use only. An area closed to motorized use should not have motorized trails in it. If motorized trails are present, then the area should be in the limited category.

**Q: Can you have a designated trail in an open area?**

A: Yes. A designated trail may go through an open area and continue on into a limited area (e.g., the Paiute Trail); however, in the open area, the user is not required to stay on the designated trail.

**Q: Do you designate or authorize remote or backcountry airstrips as part of the planning process?**

A: No. Authorizing the use of existing airstrips or the construction of a new airstrip is handled through an airport lease, not a right-of-way. The airstrips must meet the requirement of the Airport Leasing Act of 1928 (43 CFR 2911).

**Q: What are administrative routes?**

A: Administrative routes are those that are limited to authorized users (typically motorized access). These are existing routes that lead to developments that have an administrative purpose, where the BLM or a permitted user must have access for regular maintenance or operation. These authorized developments could include such items as power lines, cabins, weather stations, communication sites, spring developments, corrals, or water troughs.

**Q: Can I change an OHV area designation (open, limited, closed) without a plan amendment?**

A: No. OHV area designation changes require a plan amendment per 43 CFR 8342.2 B.

**Q: Within the limited area designation, can you move from “limited to existing” to “limited to designated” without a plan amendment?**

A: Yes, if the RMP language provides for this option through established criteria and parameters for change. If, however, the RMP is silent on this issue, a plan amendment would be required.

**Is an Environmental Assessment required?** Yes, because public comment is needed for the selection of designated routes to meet the requirements of the Administrative Procedures Act (APA).

**Q: Can I change (add or subtract) a route within a “limited to designated” roads and trails area without a plan amendment?**

A: Yes, but site-specific NEPA (refer to Washington Office IM 2004-079) is required. If there is a need to add a route or re-route a road or trail that is not currently in the transportation network, it needs to be made clear that NEPA and cultural resource compliance work or Section 106 compliance must be accomplished before construction or formal recognition can occur. An EA can cover minor changes or adjustments to the transportation network. In some areas, Field Offices may rotate route closures within the limited areas (i.e., year by year or seasonally). This is done through analysis in an EA. In an emergency situation, a route can be closed using the special rules in 43 CFR 8342.

**Q: Can I change (add or subtract) a route within a “limited to existing” roads and trails area without a plan amendment?**

A. Yes, the same as routes within a “limited to designated” category (see answer above).

**Q: What is the difference between land use planning (LUP) decisions and implementation decisions?**

A: The OHV area designations and the criteria for selecting roads and trails are LUP decisions. The individual route selection for designation is an implementation decision. For additional information, see Attachment 4, Types of Planning Decisions; LUP Handbook glossary, page 4; and Washington Office IM 2004-079, *Land Use Plan Decisions, Implementation Decisions, and Administrative Remedies*.

**Q: If the implementation decisions are made as part of the RMP, do they require a separate Decision Record (DR) from the Record of Decision (ROD)?**

A: No. They may all be included under a single ROD, but they may also be accomplished through a separate DR. See LUP Handbook, pages 30–31.

**Q: Who is considered a collaborator?**

A: Anyone who provides information to the planning effort can be a collaborator. (Refer to LUP Handbook glossary, page 2).

**Q: Who is considered a cooperator or cooperating agency?**

A: A government entity (e.g., U.S. Fish and Wildlife Service, State, County, City) that is a signatory to a memorandum of understanding outlining mutual responsibilities. The cooperator can “sit at the table” when formulating alternatives (see LUP Handbook, pages 6–9, Cooperating Agency status through the NEPA).

**Q: How and where do I start making an inventory of roads, primitive roads, and trails? How much inventory is needed?**

A: Start with Field Offices’ files, aerial photos, and Geographic Information System (GIS) data layers. Examine the BLM 100K surface maps and any published guidebooks regarding the area. State and County agencies often have information valuable. Satellite data is becoming cheaper and more readily available. Compile as much data as possible in the office before beginning an on-the-ground assessment.

Prioritize areas or sub-units of the planning area to allow for a systematic inventory process. A 100% inventory is not expected. Do not delay decisions for lack of a 100% inventory. Note: For “limited to existing” route designation, 100% inventory is highly recommended. A baseline map of the inventory should be made available to the public for its input. Solicit road, primitive road, and trail input from the public during scoping and any other comment period. Document in the administrative record that the input was incorporated into the baseline information or, if it was not, why it was not incorporated.

*Montana, North Dakota, and South Dakota EIS Example: Through site-specific planning, roads, primitive roads, and trails would be inventoried, mapped, and*

*designated as open, seasonally open, or closed. The inventory should be commensurate with the analysis needs, issues, desired resource conditions, and resource management objectives for the area. This inventory may include system roads and trails, unclassified roads and trails, non-system roads and trails, and roads and trails on existing visitor recreation maps and transportation plans.*

**Q: Does the BLM have a standard protocol for inventory of roads, primitive roads, and trails?**

**A:** Yes. Refer to Graves, P., A. Atkinson, and M. Goldbach. 2006. *Travel and Transportation Management: Planning and Conducting Route Inventories*. Technical Reference 9113-1, BLM/WO/ST-06/007+9113, Bureau of Land Management, Denver, Colorado. 51 pp.

**Q: Which methods are used to inventory roads, primitive roads, and trails?**

**A:** There are multiple methods (see chart below), and Field Offices may use more than one method at a time. Most planning projects utilize a combination approach.

**Methods of Road and Trail Data Collection**

<b>Method</b>	<b>Advantages</b>	<b>Disadvantages</b>
Local Staff Data Collection–GPS Collection	Low Cost Multitasking Equipment purchased can be utilized for future projects	Relatively Slow Dependent on skills with GPS, GIS, and appropriate vehicles Quality control can be difficult for final data
Hire seasonal data collectors	All same as above Less conflict with other priorities	Only as good as recruitment, training, and supervision allow
Volunteer GPS Data collectors; Volunteer contributed data	Low cost Equipment can be utilized for future projects	Quality control can be important BLM Supervision important Perceived “fox guarding the henhouse” image
Digitize Data from Satellite or Aerial Photography	Allows comparison with historical and future data Can be performed from the office	High rate of inaccuracy–both false negative and false positive Rarely used as the only method–often as starting point or check on other methods National Aerial Photo Program (NAPP)–ground verification of data averages–80% accuracy

Contractors/U.S. Forest Service Enterprise Teams	Trained crews can be fast, data quality usually good Specialist crews are readily available free of local shifts in priorities Contractor pays employee benefits/travel Field offices retain quality assurance/control function	High cost per mile Contractors are often overloaded May not be timely because of heavy workload
BLM Cadastral Crews	Working with survey and State GIS, data imported directly into State GIS Database Crews available with BLM supervision	Government employees, high travel costs Unpredictable pricing—no upfront cost estimates
Acquire existing data from Counties or State agencies	Low collection cost	Inconsistent or incompatible data elements may be included
Share existing BLM database with Counties, public	Low collection cost Can reduce controversy from access community	Large amounts of data to be processed and verified

**Q: What level of cultural resource inventory is needed to implement the transportation network decisions?**

A: Inventory requirements, priorities, and strategies will vary depending on the effect and nature of the proposed OHV activity and the expected density and nature of historical properties based on existing inventory information. See December 15, 2006, Washington Office IM 2007-030 and BLM Manual 8110 and Manual 8130 and State-specific policies and procedures for additional guidance.

**Q: How do I legally enforce nonmotorized area designations? What's the citation?**

A: Non-motorized area designations are enforced two ways. For temporary or seasonal closures/restrictions use 43 CFR 8364 – Closures and Restrictions. For permanent designations use 43 CFR 8365.1-6 – Supplementary Rules (43 CFR 8365 – Rules of Conduct).

**Q. Is a *Federal Register* Notice (FRN) required for enforcing motorized route designations?**

A: No. According to Law Enforcement personnel, as long as the Administrative Procedures Act was followed (public is notified and has a chance to comment), the motorized route designations decision is enforceable with the signing of the ROD.

**Q: What authority should I use to protect persons, property, and public lands and resources affected by nonmotorized (mechanized, stock, foot, or other) travel?**

A: 43 CFR 8364 - Closures and Restrictions is utilized for temporary or seasonal closures or restrictions. 43 CFR 8365.1-6 – Supplementary Rules is utilized for permanent designations.

**Q: Do we need an additional FRN on route designations once the ROD for the RMP is signed?**

A: An additional FRN is not needed for motorized road and trail designations. A Notice of Availability (NOA) with the signing of the ROD is the final step at which point the decisions can be implemented and enforced. If other restrictions are being put in place, such as limiting mountain bike use, a supplementary rule would have need to be published in the *Federal Register*.

**Q: If routes are deferred until after the RMP is completed and a Travel and Transportation Management Plan is made to designate trails, primitive roads, and roads, do we need an FRN to make the designations enforceable?**

A: No, as long as an EA is completed and the public has been notified and has had a chance to comment on the proposed action. The selection of roads and trails is an implementation of the RMP decisions—not a new rule—and therefore is enforceable with the signing of the decision record. If other restrictions are being put in place, such as limiting mountain bike use, a supplementary rule would have to be published in the *Federal Register*.

**Q. What if there is a fire in a closed area and there is a need to drill to stabilize the soils or to start the recovery of wildlife habitat? What if a fire burns in an open area and there is a need to close the area to promote vegetative recovery in absence of external effects?**

A. In the above situations, the BLM has the ability to take management actions necessary to protect and recover the soils and vegetation.

**Q: What kind of exceptions can be made for game retrieval?**

A: If there are exceptions for game retrieval, they should be described in the Travel and Transportation Management Plan. There is no national standard for this type of exceptions. Field Offices should consider coordinating this policy with other Federal land management agencies and with their State wildlife resources department. Within the BLM, for example, the Montana BLM allows for this exception whereas the Utah BLM does not.

**Q: What other kinds of exceptions can be made?**

A: 43 CFR 8340.0-5 (a) excepts certain uses from the OHV regulations, such as:

- (1) Any nonamphibious registered motorboat;
- (2) Any military, fire, emergency, or law enforcement vehicle while being used for emergency purposes;
- (3) Any vehicle whose use is expressly authorized by the authorized officer, or otherwise officially approved;
- (4) Vehicles in official use; and
- (5) Any combat or combat support vehicle when used in times of national defense emergencies.

### **Questions and Answers for National Scenic and Historic Trails**

**Q: Is travel and transportation planning different in any way for National Scenic Trails and National Historic Trails?**

A: Yes. There are special requirements for National Scenic and Historic Trails. These can be found in the Land Use Planning Handbook, Appendix C, Section III. A. (Congressional Designations—National Scenic and Historic Trails). It is recommended that those provisions be understood and addressed in advance of area designation and route selection.

**Q: How are these requirements different?**

A: National Scenic and Historic Trails (NSHTs) are long-distance trails designated by the U.S. Congress. On BLM-administered lands, they are units of the National Landscape Conservation System and fall under the provisions of the National Trails System Act. Each trail has unique enabling legislation and is administered and managed under a special trailwide comprehensive management plan.

NSHTs are not only physical routes on the ground—composed of roads, primitive roads, and trails by the BLM definition—but some national trails or trail segments are also cultural properties such as ruts, traces, swales, or historic sites. Some scenic trail segments require point-to-point navigation, and some historic trails show only as a route on a congressional map, with no discernible evidence of human passage on the ground. Although they are called “trails” by Congress and meet the BLM’s definition of trail (or

primitive road or road) in some places, the character of these linear features—and their setting or context—can vary significantly.

Allowing motorized or nonmotorized travel or identifying NSHTs as part of a transportation system must be viewed in light of the laws, regulations, policy, and comprehensive management plans that govern these resources, as well as the resource objectives the BLM may have for the area.

**Q: How are these requirements the same?**

A. Normally, in areas where NSHTs are and will continue to be managed as roads, primitive roads, or trails by the BLM definition, they would fall within the “limited area” category. Where national trails are considered cultural properties, or where viewshed or setting protection is desired to retain landscape character or for other purposes including visitor experience, a “closed area” designation may be used, depending on public access considerations. As in the Special Designation section of the handbook for these trails, all resource allocation tools should be used to create the best set of alternatives, rather than relying solely on area and trail designations.

Similarly, when designing a route network for a “limited area,” use care in route selection and the types of uses that are or are not permitted on NSHTs. Those may be dictated by law or policy in some instances, especially for motorized use and scenic trails, and motorized or nonmotorized use on historic trails or cultural properties. National trails should not be identified for disposal or reclamation.

**Q: What additional guidance is available for National Scenic and Historic Trails to help determine travel and transportation provisions?**

A: The BLM guidance for the National Scenic and Historic Trails Program can be found in the Federal Land Policy and Management Act, National Trails System Act, Departmental Manual Section 710, Executive Order 13195, 43 CFR 8351.1-1 *Motorized vehicle use*, and Appendix C, Section III. A. of the Land Use Planning Handbook and other applicable laws such as the National Historic Preservation Act and related BLM manuals. The Comprehensive Trail Management Plan for each trail may also contain applicable provisions. General guidance for the program will be produced over the next 10 years through implementation of the new National Scenic and Historic Trail Strategy and Work Plan.

**Q: Can a National Scenic and Historic Trail segment be a TMA?**

A: Yes. It can be part of a TMA, or be its own TMA, depending on the resource issues in the planning area.

Activity level (implementation) plans are warranted for some national scenic or historic trail segments (see LUP Handbook, Appendix C, Section III. A. Congressional Designations—National Scenic and Historic Trails).

**Q: Should NSHT be placed in Facility Asset Management System?**

A: Yes, following the required data standards. See the Interagency Trail Data Standards for additional guidance at <http://www.nps.gov/gis/trails/>.