

Summary And Key Points of USDA Proposed Changes to the Travel Management Rule

What the 2005 Travel Management Rule Does

Adopted in response to surging off-road vehicle use and the spread of user-created routes, the Travel Management Rule (36 C.F.R. parts 212 and 261) ended unmanaged cross-country motor vehicle travel on national forests. Each forest and grassland designates the roads, trails, and areas open to motor vehicles, by vehicle class and season, on a free Motor Vehicle Use Map; motorized use off that system is prohibited. Managers must apply “minimization criteria” to limit damage to soil, water, vegetation, and wildlife habitat and to reduce user conflicts, and must use travel analysis to identify the minimum road system the agency needs and can afford to maintain. Nearly every national forest (148 of 154) and all 20 national grasslands have completed their maps.

Key points in the FSEEE–PEER comments:

- **Fiscally unsustainable.** The Forest Service reports \$11.44 billion in total deferred maintenance, including \$6.12 billion for roads, and even that road figure omits closed and high-clearance roads, most of the system’s mileage, because their backlog “cannot be estimated with a suitable degree of confidence.” Road maintenance appropriations fell from \$234 million in 2004 to \$73 million in 2024.
- **A workforce cut by two-thirds.** The FY 2027 budget projects permanent positions falling from 35,553 in 2024 to 11,787 in 2027, a 67 percent cut, even as the proposal would require every forest to screen all of its closed and restricted routes every year.
- **Contradicts the agency’s own data.** A travel analysis of all 2,499 road miles on Minnesota’s Superior National Forest found 99 percent of them necessary, and identified changes that would cut annual maintenance costs 19 percent while keeping 97 percent of the roads. Travel analysis is an inventory and budgeting tool, not a closure program.
- **Legal authority in question.** The Organic Administration Act, which USDA cites as its authority, directs the Secretary to “preserve the forests thereon from destruction” — the opposite of the proposed repeal of protective standards. The Multiple-Use Sustained-Yield Act defines multiple use as management of the various resources “each with the other, without impairment of the productivity of the land,” and “not necessarily the combination of uses that will give... the greatest unit output.” 16 U.S.C. § 531(a). A presumption favoring one use — increased motorized access — while removing the only national criteria that protect the others is what that definition forecloses. USDA said so itself in 2015: forest uses “must be balanced, rather than given preference.”
- **USDA’s own analysis documents the harm.** USDA’s August 2026 draft EIS for rescinding the Roadless Rule finds landslides six to nine times more likely next to forest roads, elk survival rising when roads were closed and falling when gates came down,

and more wildfire risk with more road access. It relies on travel management to contain those harms, the same safeguards USDA now proposes to remove.

- **Lasting damage to wildlife and water.** Roads and motorized routes fragment habitat and divide wildlife into isolated gene pools, effects that build over generations and are difficult to reverse. National forest watersheds supply drinking water to more than 48 million people.
- **Changing conditions call for stronger standards.** Worsening wildfire and drought, record visitation, and faster off-highway vehicles raise the stakes of poorly sited routes. Wildfire ignitions are more than four times as dense near roads as in wilderness.
- **Serving few at the expense of many.** Off-highway vehicle riding is the primary activity for 1.9 percent of national forest visits; hiking, for 28.9 percent. The plan would also open roughly 67,800 miles of non-motorized trails to class 1 e-bikes without site-specific review.