



August 20, 2026

Oregon State Snowmobile Association Public Comment on the Blue Mountains Forest Plan Revision Draft Environmental Impact Statement

To the Blue Mountains Forest Plan Revision Team:

The Oregon State Snowmobile Association (OSSA) submits these comments regarding the Draft Environmental Impact Statement (DEIS) and proposed revised land management plans for the Malheur, Umatilla, and Wallowa-Whitman National Forests.

OSSA represents snowmobile clubs, volunteers, grooming programs, and winter recreationists throughout Oregon. Our members have a direct interest in the management of the Blue Mountains national forests. These forests contain important snowmobile trail systems, Sno-Parks, warming shelters, grooming routes, and access corridors that have been used and maintained by generations of Oregonians.

OSSA supports healthy forests, responsible multiple-use management, active forest management, wildfire risk reduction, and continued public access. We are concerned that the proposed plan does not provide adequate certainty that these principles—particularly motorized recreation and access—will be protected over the life of the revised forest plans.

Motorized Recreation and Future Access

Our primary concern is the potential effect of the proposed plan on existing and future motorized access.

We understand that site-specific travel-management decisions are not being made through this forest plan revision. However, Recreation Opportunity Spectrum (ROS) classifications, suitability determinations, management-area direction, desired conditions, standards, guidelines, and other plan components established now can influence future travel-management decisions.

For Oregon's snowmobile community, that distinction is extremely important.

A future travel-management decision may occur years from now, but the foundation for that decision can be established through this forest plan. OSSA therefore asks the Forest Service to evaluate and clearly disclose how the complete package of proposed plan components could affect existing snowmobile routes, groomed trail systems, winter motorized access, Sno-Park connections, warming shelters, grooming operations, and other infrastructure supporting winter recreation.

The final plan should provide clear direction that existing motorized recreation opportunities will not be reduced simply because of ROS classifications or other broad planning designations unless a site-specific analysis demonstrates that a restriction is necessary.

Protect Oregon's Snowmobile Trail Systems

Snowmobile access in eastern Oregon is not simply a recreational convenience.

Local snowmobile clubs and volunteers contribute substantial time, equipment, and resources to maintain groomed trail systems and associated infrastructure. These trail systems connect communities with public lands and provide winter recreation opportunities for residents and visitors.

They also support rural businesses, including fuel stations, restaurants, lodging establishments, repair shops, dealerships, and other businesses that depend on winter recreation.

OSSA asks the Forest Service to recognize these established uses and the investments that local communities and volunteers have made in these trail systems.

The revised plans should protect existing motorized winter recreation opportunities and ensure that management direction does not unintentionally create future barriers to maintaining, grooming, accessing, or restoring established snowmobile routes.

Active Forest Management and Wildfire

OSSA is also concerned that the proposed plan does not go far enough to increase active forest management.

Oregon's snowmobile community has seen firsthand what catastrophic wildfire can do to recreation infrastructure and access. Wildfires can destroy trail systems, bridges, signs, warming shelters, vegetation, access routes, and other infrastructure. Even when facilities survive, burned landscapes and subsequent hazard-tree conditions can leave routes inaccessible for years.

This is not an abstract concern for OSSA. Wildfires in Oregon have already significantly affected snowmobile trail systems and the communities that maintain and use them.

Forest management should provide managers with the flexibility and tools necessary to reduce hazardous fuels, improve forest health, maintain roads and access corridors, conduct vegetation treatments, and respond to changing forest conditions before catastrophic wildfire occurs.

OSSA is therefore concerned by projections indicating that even under Alternative 2, timber output would remain substantially below levels identified in the 1990 forest plans. A revised plan intended to guide these forests for decades should create greater opportunities for responsible active management—not establish additional layers of restrictions that make management more difficult.

Roads and Access Are Essential

Road systems within the national forests are critical to much more than timber production.

They provide access for recreationists, grooming equipment, emergency responders, firefighters, search and rescue personnel, land managers, ranchers, permittees, contractors, and the public.

For snowmobile programs, forest roads frequently become groomed winter recreation routes after snowfall. A road that appears unnecessary when viewed only through the lens of summer passenger-vehicle use may be an important part of a winter trail system.

OSSA asks the Forest Service to consider these seasonal uses before establishing plan direction that could contribute to future road closures, decommissioning, or restrictions.

The final plan should recognize motorized access as an important component of multiple-use management and should preserve sufficient flexibility to maintain roads and routes serving recreation, forest management, emergency response, and rural communities.

Multiple Use and Rural Communities

OSSA is also concerned about the cumulative effect of proposed plan components on the communities surrounding these forests.

Timber production, grazing, recreation, hunting, snowmobiling, forest management, and other traditional uses are interconnected with the economic and social health of rural Oregon.

The proposed plan should clearly demonstrate how it will sustain these multiple uses rather than simply document their continued decline.

We are particularly concerned that current grazing levels are reportedly substantially below levels identified in the 1990 plans, while the proposed plan does not clearly demonstrate how lost opportunities will be restored. Although OSSA's primary mission is snowmobiling, we strongly support the multiple-use principle and recognize that healthy rural communities depend upon continued access to public lands for a variety of productive and recreational uses.

Transparency and a Complete Public Review

OSSA is also concerned about the availability of information referenced in the DEIS.

When an environmental review directs the public to supplemental information, that information should be readily available during the comment period. If referenced information is missing or references are later identified as errors, the public's ability to fully understand and evaluate the proposal is diminished.

For a planning process of this magnitude—covering three national forests and establishing management direction that could remain in place for decades—the public deserves complete, understandable, and readily accessible information.

The Forest Service should ensure that all information necessary to understand the environmental, recreational, social, and economic consequences of the alternatives is available before final decisions are made.

OSSA's Requested Changes

OSSA respectfully requests that the Forest Service revise the proposed plans to:

1. Protect existing motorized winter recreation opportunities, including established snowmobile routes, groomed trail systems, Sno-Park connections, warming shelters, and grooming access.
2. Clearly evaluate the cumulative effect of ROS classifications, suitability determinations, management areas, standards, guidelines, and other plan components on future motorized access and travel management.
3. Ensure that ROS classifications and other forest-plan designations do not function as predetermined motorized closures when future site-specific travel-management decisions are made.
4. Increase opportunities for active forest management, including vegetation management, hazardous-fuels reduction, timber management, road maintenance, and other treatments necessary to improve forest health and wildfire resilience.

5. Recognize forest roads as important multiple-use infrastructure, including their seasonal importance to snowmobile trail systems, grooming operations, emergency response, firefighting, forest management, and rural communities.
6. Maintain management flexibility for multiple uses, including recreation, timber production, grazing, hunting, forest management, and other traditional uses of the national forests.
7. Fully analyze and disclose the economic and social consequences of reduced access and resource use on rural communities surrounding the Malheur, Umatilla, and Wallowa-Whitman National Forests.
8. Provide complete and accessible supporting information so the public can meaningfully evaluate proposed management direction before final decisions are made.

Conclusion

The Blue Mountains national forests belong to all Americans and have a long history of multiple use. The revised forest plans should provide a framework for healthy forests, responsible management, strong rural communities, and continued public access.

OSSA does not support a plan that manages these forests primarily through additional restrictions or establishes planning designations today that become the justification for closing motorized routes tomorrow.

We support active management. We support healthy forests. We support responsible recreation. And we strongly support maintaining meaningful motorized access to Oregon's public lands.

The Forest Service has an opportunity through this revision to create plans that restore forest health while preserving the access and multiple-use traditions that generations of Oregonians have depended upon.

OSSA respectfully asks the Forest Service to revise the proposed plans accordingly and ensure that motorized winter recreation, active forest management, and public access remain meaningful components of the final Blue Mountains forest plans.

Respectfully submitted,



Dennis Jordan, President

Oregon State Snowmobile Association

20354 Empire Ave, Ste D9

Bend, OR 97703

(541) 797-6880

www.oregonsnow.org