



Oregon State Snowmobile Association

Public Comment on the Proposed Rescission of the 2001 Roadless Area Conservation Rule

August 20, 2026

The Oregon State Snowmobile Association (OSSA) supports the U.S. Forest Service's proposal to rescind the 2001 Roadless Area Conservation Rule.

OSSA represents snowmobile clubs and winter recreationists throughout Oregon. Our member clubs work cooperatively with the U.S. Forest Service and other public agencies to maintain snowmobile trail systems, groom winter recreation routes, maintain warming shelters, assist with public safety, and provide access to winter recreation opportunities on public lands.

Because much of Oregon's snowmobile trail system is located on National Forest System lands, our members have extensive, firsthand experience with forest conditions and with the impacts that wildfire, hazardous trees, overgrown vegetation, damaged roads and trails, and access restrictions can have on public recreation.

Recent Wildfire Impacts to Oregon Snowmobile Recreation

The 2026 wildfire season provides immediate examples of why OSSA believes proactive forest management and greater flexibility for local land managers are necessary.

Grasshopper Fire - Mt. Hood National Forest

The Grasshopper Fire has burned approximately 90,000 acres on and near the Mt. Hood National Forest. The fire has significantly damaged areas used by the Columbia Gorge Power Sledgers and has destroyed much of the club's snowmobile trail system. The consequences will continue well beyond the wildfire itself. Trails will need to be assessed for hazardous trees and other damage, access routes may need to be reopened or repaired, and volunteer labor and financial resources will be required before portions of this winter recreation system can safely return to use.

Hagen Fire - Tollgate Area

The Hagen Fire has burned nearly 60,000 acres and has devastated the area used by the Tollgate Trail Finders. The club's snowmobile trail system has been extensively damaged by the fire. This is not simply a temporary loss of recreational opportunity. Restoring a trail system following a wildfire of this magnitude can require substantial volunteer labor, equipment, funding, coordination with land-management agencies, removal of hazardous trees, and rehabilitation of damaged routes.

Rowe Creek Complex - Central Oregon

The Rowe Creek Complex has burned approximately 373,785 acres in Central Oregon. The fire has wiped out much of the snowmobile trail system used and maintained by Ochoco Snow Sports. The scale of this fire illustrates the potential consequences when wildfire moves across large landscapes. For snowmobile organizations, the effects can include loss of established routes, hazardous trees, damaged signs and infrastructure, restricted access, and years of trail restoration work.

Second Flat Fire - Harney County

The Second Flat Fire has burned approximately 105,854 acres in Harney County and has affected the snowmobile trail system used and maintained by the Harney County Snowmobile Club. This large wildfire is another example of the direct impact catastrophic fire can have on Oregon's winter recreation infrastructure. Damage to established routes, hazardous trees, access restrictions, and other post-fire conditions can require substantial volunteer labor, equipment, funding, and coordination with land-management agencies before the affected trail system can safely return to use.

These Impacts Extend Beyond Recreation

These four fires alone have burned more than 630,000 acres in Oregon during the 2026 fire season and demonstrate the extraordinary scale of wildfire impacts affecting public lands, recreation, access, and communities across the state.

For OSSA and our member clubs, these losses represent decades of volunteer work and public investment. Oregon snowmobile clubs do much more than ride these trails. Volunteers maintain routes, remove hazards, install signs, operate grooming equipment, maintain warming shelters, assist with public safety, and work cooperatively with the U.S. Forest Service and other land-management agencies.

When catastrophic wildfire destroys a trail system, the public loses those recreational opportunities and the infrastructure and volunteer investment that made them possible.

The Need for Greater Management Flexibility

Oregon's national forests vary tremendously in geography, vegetation, wildfire risk, recreation use, and management needs. OSSA does not believe a single nationwide management restriction can adequately account for those differences.

Local Forest Service personnel understand the conditions within their forests. They also work directly with counties, Tribes, recreation organizations, permittees, volunteers, neighboring communities, and other forest users.

OSSA supports providing those managers with greater flexibility to evaluate management needs on a site-specific basis and determine what actions are appropriate for a particular landscape. That flexibility is particularly important where existing access may be necessary to conduct fuels reduction, remove hazardous trees, restore areas damaged by wildfire, maintain recreation infrastructure, or provide for emergency response and public safety.

Recreation Access Should Be Considered in Future Management Decisions

OSSA's support for rescinding the Roadless Rule should not be interpreted as support for unrestricted road construction or development on National Forest System lands.

Rather, we support responsible, site-specific forest management that considers forest health, wildfire risk, conservation, recreation, public safety, and appropriate public access.

For Oregon's snowmobile community, many existing forest roads serve an important purpose during the winter. Once covered by snow, these routes become part of groomed and ungroomed winter recreation systems. Maintaining appropriate access to these routes can also be essential for grooming equipment, trail maintenance, warming shelter maintenance, volunteer activities, search and rescue, and emergency response.

As the Forest Service moves away from the nationwide Roadless Rule framework, OSSA asks the agency to specifically consider the effects that future forest-management decisions may have on established motorized winter recreation routes and associated infrastructure.

OSSA's Recommendations

1. Rescind the 2001 Roadless Area Conservation Rule and allow forest-management decisions to be made with greater consideration of local conditions and needs.
2. Provide local forest managers with sufficient flexibility to conduct proactive forest-health and hazardous-fuels work, particularly where wildfire threatens communities, recreation infrastructure, public access, or other forest resources.
3. Preserve appropriate access to existing forest roads and routes where that access supports forest management, recreation, emergency response, trail maintenance, grooming operations, or other legitimate public uses.
4. Consider established motorized winter recreation when evaluating future management actions, including the potential effects of road closures, decommissioning, restoration projects, and changes in access.
5. Continue meaningful coordination with local stakeholders, including recreation organizations, counties, Tribes, permittees, volunteers, and communities that have direct knowledge of individual forests.
6. Evaluate management decisions at the local and landscape level, recognizing that conditions and management needs in Oregon may be substantially different from those in other regions of the country.

Conclusion

OSSA's members have seen what happens when catastrophic wildfire affects the forests where we recreate and volunteer. The consequences can include damaged trails, lost access, hazardous conditions, destroyed or threatened recreation infrastructure, and years of recovery.

We believe preventing and reducing those impacts through responsible forest management is preferable to continually responding to them after a catastrophic wildfire has occurred.

Rescinding the 2001 Roadless Area Conservation Rule can provide an opportunity for a more flexible, locally informed approach to managing our national forests while continuing to protect the resources and recreational opportunities that make these public lands so valuable.

For these reasons, the Oregon State Snowmobile Association supports the proposed rescission and encourages the Forest Service to move forward with a management approach that emphasizes healthy forests, proactive wildfire risk reduction, appropriate public access, and meaningful local involvement.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dennis Jordan", with a stylized flourish at the end.

Dennis Jordan, President

Oregon State Snowmobile Association