



September 17, 2026

U.S. Department of Agriculture

U.S. Forest Service

Re: Travel Management Rule Revision - Docket No. FS-2026-0100

Dear U.S. Forest Service:

The Oregon State Snowmobile Association (OSSA) appreciates the opportunity to comment on the proposed revision of the Travel Management Rule, 36 CFR Part 212.

OSSA represents snowmobile clubs, riders, volunteers, and trail-maintenance partners throughout Oregon. Our members recreate extensively on National Forest System lands and work closely with the U.S. Forest Service and other land managers to maintain trails, provide signing, promote safe and responsible recreation, and preserve winter access for the public.

OSSA supports a travel-management framework that recognizes responsible public access as an important use of National Forest System lands and provides local Forest Service officials with the flexibility to make decisions based on actual, site-specific conditions.

We support the proposed presumption that existing roads, trails, trailheads, and other access routes are open to appropriate public use unless a closure or restriction is required by law or supported by specific, documented and justifiable reasons. Such decisions should continue to consider science-based resource conditions, public safety, conflicts among uses, and maintenance and administrative capacity.

For Oregon snowmobilers, it is particularly important that the revised rule recognize the unique nature of over-snow vehicle recreation. Snowmobiles generally operate on a temporary snow surface. Unlike many forms of ground-based motorized recreation, properly operated snowmobiles on adequate snow cover do not create a permanent trail or permanent tire track on the landscape. Our tracks melt with the snow. Maintaining reasonable winter access allows the public to enjoy National Forest lands while preserving those riding opportunities for future generations.

OSSA therefore cautions against adopting a nationally prescribed minimum snow-depth requirement, such as an arbitrary 8- or 12-inch threshold, for opening snowmobile routes or beginning grooming operations. Snow conditions vary greatly across Oregon by elevation, terrain, vegetation, storm cycle, temperature, and the type of underlying surface. A single nationwide measurement would not accurately reflect whether a particular trail can be safely and responsibly groomed or ridden.

Instead, decisions regarding adequate snow cover should remain local and conditions-based, with input from Forest Service personnel and experienced grooming and snowmobile organizations that understand the particular trail system. The goal should be protection of resources, not application of an inflexible numerical standard that may unnecessarily restrict winter recreation.

OSSA also supports reconsideration of existing closures and highly restricted routes when conditions have changed or when a closure is no longer necessary. We believe an annual unit-level review can provide an important opportunity to revisit restrictions that may have been imposed years ago under circumstances that no longer exist.

At the same time, OSSA believes the revised rule should ensure meaningful public participation before significant changes are made to established over-snow vehicle access. Snowmobile clubs and associations have invested substantial volunteer time, equipment, funding, and labor in maintaining winter trail systems in partnership with the Forest Service. Local snowmobile organizations should be consulted when decisions could close, relocate, restrict, or materially change established snowmobile routes or riding areas.

We also support consideration of new roads, trails, and other access opportunities where appropriate. As recreation patterns, wildfire impacts, forest-management activities, and community needs change, the Forest Service should have the flexibility to establish or restore appropriate winter access rather than relying indefinitely on decisions made under conditions that may no longer exist.

Finally, OSSA strongly supports clear, accurate, and timely mapping of motorized and over-snow access. Accurate maps help riders stay within designated areas, reduce unintended conflicts, and make responsible recreation easier.

As the Forest Service develops the proposed rule and Environmental Impact Statement, OSSA asks that the agency recognize over-snow recreation as distinct from ground-based motorized travel; avoid a one-size-fits-all national snow-depth requirement; preserve local, conditions-based decisions about when snowmobile riding and grooming can responsibly occur; retain meaningful participation by snowmobile organizations in decisions affecting established winter routes and riding areas; require specific, documented justification for restrictions or closures; provide a workable process for reconsidering unnecessary or outdated closures and creating appropriate new access; and maintain clear, current, and readily available maps of over-snow vehicle routes and areas.

Snowmobilers have a strong interest in protecting the lands where we recreate. We do not want to damage habitat - we want healthy forests, healthy wildlife populations, and sustainable riding areas that can continue to be enjoyed by our children and grandchildren. Our tracks are temporary; when the snow melts, they disappear. Our commitment to responsible access and stewardship remains.

Thank you for considering the perspective of Oregon's snowmobile community as the Forest Service develops the revised Travel Management Rule.

Sincerely,

Dennis Jordan

President

Oregon State Snowmobile Association