

June 14, 2024

Rio Grande National Forest
1055 9th Street
Del Norte, Colorado 81132



To Whom It May Concern:

Thank you very much for the opportunity to comment on the published Notice of intent to prepare an environmental impact statement regarding the designation of roads, trails, and areas of the Rio Grande National Forest (RGNF) which would be open to motorized over-snow use. The International Snowmobile Manufacturers Association (ISMA) is comprised of the four major snowmobile manufacturers (Arctic Cat, Polaris, Ski Doo, and Yamaha) and we are dedicated to promoting safe snowmobile ridership, capturing and reporting industry data, and supporting the growth of snowmobiling. The American Council of Snowmobile Associations (ACSA) is a national organization uniting the snowmobile community and promoting snowmobiling as a safe, fun and environmentally friendly family sport.

We are disappointed that this proposed action from the Forest Service includes a mandatory minimum unpacked snow depth of 12 inches on designated roads, trails, and areas for Over-Snow Vehicle (OSV) use. The requirement is without justification and its application is counter to established practices among snowmobilers who know how to groom safe trails that do not harm the land beneath the packed snow and ice.

In fact, the minimum unpacked snow depth regulations proposed in the Notice would be a step backward from current trail management practices. The best trails for riders and for the land are ones in which each layer of snow is compacted shortly after snowfall. By compacting it to ice, the layers protect the underlying soil. Each subsequent grooming pass after each subsequent snowfall increases the durability of the trail. If trail grooming is deferred until the depth of snow is 12 inches, the snow does not compact as well and is less durable, thus posing greater harm to the land underneath.

Instead of minimum depth requirements, we recommend that the USFS adopt the policy detailed in *Guidelines for Snowmobile Trail Groomer Operator Training: A Resource Guide for Trail Grooming Managers and Equipment Operators (2005)*¹. Prepared after thorough analysis, the recommendations of the International Association of Snowmobile Administrators (IASA) in this document provide a thoughtful approach to early season trail grooming, particularly with respect to early season trail preparation.

Snowmobilers are excellent stewards of the land on which they ride. Snowmobiling clubs and individual enthusiasts self-fund a large portion of trail maintenance nationwide and thus are invested in ensuring that a winter of snowmobiling does not have an adverse impact on trails that will become evident when the snow melts. Similarly, it is in the best interest of ISMA, ACSA and our members that snowmobiles do not harm the land upon which they are driven. We believe the best way to satisfy the intent of the minimum depth requirement (“To reduce potential damage to resources...”) is to adhere to IASA’s guidelines.

Thank you for your attention to this comment. Please let us know if we can be of additional assistance on this critically important issue.

Sincerely,

Jaret Smith
President
ISMA

Bert Miller
President
ACSA

¹ <https://www.snowiasa.org/wp-content/uploads/2013/05/groomer-guide.pdf>