



**MEMORANDUM**

**To:** David Chandler, Federal Highway Administration  
**From:** Amanda Lewis, Massachusetts Recreational Trails Program Coordinator  
**CC:** Paul Jahnige, Greenways and Trails Program  
**Date:** November 28, 2016  
**Re:** **Buy America Waiver Requests – FY17, 1st Quarter**

Please review the following request for two waivers for equipment purchases using Recreational Trails Program funds in Massachusetts. These requests are in accordance with Buy America provisions. Please refer to attachments for further details on the grant project and the waiver request items.

**STIP Project ID: SRT**

**Item #1: Conway Snowmobile Club, Trail Maintenance and Grooming Power Unit**

**Project Description:** This project will provide needed equipment for snowmobile trail grooming, matched with repairs and maintenance throughout the 120-mile trail system that the snowmobile club maintains and grooms in the winter. Trails in the system connect to four bordering towns and encompass the Conway State Forest, South River State Forest, town and private lands.

**Grant Award Amount:** \$67,688

**Grant Match:** \$24,436

**Waiver Item Description:** 2017 Favero Snow Rabbit 3X Groomer

**Waiver Item Cost:** \$93,124

**Country of Origin of Product:** Italy

**Reason for Waiver Request:** The trails in Conway and the surrounding area that are groomed by the Conway Snowmobile Club require a light-weight and narrow snow grooming power unit. The trails themselves are narrow and minimally developed with equally narrow and primitive bridges throughout, which can only accommodate small and light machinery. If a larger and heavier machine is used, the trail tread will be compromised and possibly destroyed, and adjacent natural resources could be negatively impacted. The Snow Rabbit 3 by Favero is just under 6 ½ feet in width and weighs 4,850 pounds. There are no other snow grooming machines available on the market with similar specifications. Thus, a waiver is requested to allow the club to purchase a machine that is appropriate for the intended use on the existing trail system.



There is just one snow grooming machine manufacturer in the United States, known as Tucker. The smallest Tucker machine available is over 8,000 lbs and 8 feet wide (7 ft is special order, machines are normally sold at 8 feet wide or larger). Another option would be to purchase a tractor and then install tracks and a grooming drag separately. Although there are tractors available that are manufactured and assembled in the US, these machines are typically 30,000 lbs or more with all of the necessary equipment for snow grooming included, and therefore are not feasible for this particular trail system.

Given the highly-specialized nature of the Snow Rabbit 3 which meets the particular requirements for grooming on the Conway Snowmobile trail system, and the lack of alternate viable options for similar or equivalent equipment manufactured and assembled in the US, a waiver is necessary to move forward on this particular grant project. Please see the attached documentation indicating the specifications for the Favero groomer and an email from GETSNO Equipment in Newport, Vermont which provides information on due diligence to support this waiver request.

## **Item #2: Knox Trail Sno-Riders, Tolland and Otis State Forest Grooming Project**

**Project Description:** This project will upgrade existing grooming equipment that is deteriorating with new parts and attachments to enable the club to continue to maintain recreational trails in Tolland and Otis State Forest in the winter months. Improved reliability and efficiency of the equipment will allow for less impact on the environment and more groomed trails for all winter recreationalists.

**Grant Award Amount:** \$71,250

**Grant Match:** \$23,750

**Waiver Item Description:** Soucy ST-300 Track System

**Waiver Item Cost:** \$29,500

**Country of Origin of Product:** Manufactured and assembled in Canada

**Reason for Waiver Request:** The snowmobile club is able to purchase the groomer/tractor and drag for this project within the United States. The groomer is manufactured and assembled in Georgia and the drag is manufactured and assembled in Wisconsin. The tracks that are needed to attach to the groomer for winter grooming operations are manufactured and assembled in Quebec, Canada. This request for a waiver is necessary because of two reasons. The snowmobile club has located alternative tracks that are manufactured and assembled in the US, however, these tracks were quoted at \$48,443 directly from the manufacturer, which is \$18,943 more, or a 64% increase in cost (see attached documentation). Additionally, none of the vendors who sell the groomer will purchase and install the domestically-made tracks. This is because that particular track system is not made to fit the tractor that is sourced in the US. The snowmobile club would have to install the tracks themselves, which would provide no warranty or guarantee for the installation process. This could add more cost to the purchase down the road, in addition to the initial higher cost of the domestic tracks. Thus, the club is seeking a waiver to purchase tracks that the vendor will install and warranty.

Two separate quotes are provided in the documentation for this waiver. Bid #1 is the selected vendor with the foreign-made Soucy Tracks included. The documentation from Mattracks, Inc. shows the quote for the domestically-produced tracks, as a part of the alternatives analysis in applying for a waiver under Buy America.