



## ST. MARYS AREA SNOWMOBILE ASSOCIATION

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Department of Conservation & Natural  
Resources Mark Hansford  
Greenways + Trails Program Specialist  
Bureau of Recreation and Conservation Partnerships  
Division 400 Market St, 5th Floor  
Harrisburg, PA 17105-8475

RE: Buy America Waiver Request  
St. Marys Area Snowmobile Association Grooming Equipment  
Project Grant # BRC-PRT-21-175 (ME1 100399)  
GR4100073371

Dear Mr. Hansford:

The St. Marys Area Snowmobile Association respectfully requests a waiver of the Buy America requirements of 23 CFR 635.410 for the medium frame tractor for the Association's Grooming Equipment Project, currently moving toward the bidding process. Please find details relating to the waiver request below.

### **Justification of the Need for the Particular Type of Tractor:**

As laid out in our Grant Project Narrative, we need an all-season, all-terrain piece of equipment that is able to utilize various attachments to conduct trail maintenance in the summer as well as the winter. In the winter, the equipment will be used to pull a snow grooming drag and clear the trail of large downed trees with the loader attachment because they cannot be manually removed. In the summer, the equipment will be used to maintain the trail of large downed trees as mentioned previously, but also to clear the trail of vegetation with a brush-hog type attachment or mower, and also trim woody vegetation with an articulating boom-mower. Also the loader attachment can be used for minor trail surface repairs such as wash-outs, or culvert pipe restoration/installation. A Sno-Cat or similar snow-grooming only equipment is not able to utilize the above-described attachments for trail maintenance. The utilization of a tractor rather than a snow cat machine also reduces the over-all length of our equipment combination by 4 feet. This length reduction allows easier navigation of trail intersections and maneuverability on the trails. A medium frame tractor will fulfill all of our maintenance responsibilities year-round.

The tractor sizes can be reduced to roughly four categories: large frame, medium frame, compact and consumer. Consumer tractors are typically used for lawn mowing and residential lawn care, compact tractors are a bit larger and perform lawn care, but also can utilize appropriately-scaled attachments, large frame tractors are utilized in industrial, agricultural farm settings with various attachments and being the largest in overall size, while medium-frame tractors are between the large and compact in size, horsepower and attachment utilization, and are uniquely suited to our responsibilities.

The primary use of the tractor is to pull a snow grooming drag, which collects, levels, processes and compacts snow covering the trail. The drag, as its name implies, needs to be pulled along the trail by a separate piece of machinery, which must have sufficient power to move itself and the drag over the snow, but also overcome the resistance of the drag's various snow-cutting blades, and snow compaction pan. The drag specified requires a minimum of 120-150 horsepower tractor and weight of 11,000 - 14,000 pounds to navigate in typical snow and terrain conditions, so this eliminates the compact and consumer classes of tractors. The large frame tractors, while possessing adequate horsepower and weight, are dimensionally too large in stature to be practically used on most of the Association's trails. Our typical trail is 10 - 20 feet wide with tree cover 10 feet over head, so these tractors would require extensive trail widening and vegetative canopy removal.

In addition to the power requirements of snow grooming; are the traction requirements. To achieve this, the tractor's regular tires are removed and are replaced with a track system to increase its overall contact patch with the snow surface. These tracks are able to be used year-round, and in all conditions and environments. Due to the additional ground contact of the track system, the drivetrain of the tractor needs to be over-built more than for a typical hub and wheel system. The track system manufacturers are aware of this and only produce track systems for tractors that have these types of drivetrains so they provide typical and reliable service intervals with the track systems. Track manufacturers such as Soucy, do not produce a track system for medium frame Kubota tractors, because they are not confident in the stoutness of their drivetrains to handle the increased strain the track system induces, and thus we cannot utilize a medium frame Kubota tractor.

**Explain the impact of not having the approval:**

There are no other options other than having the correct size, and powerful tractor to navigate the restricted trails and pull the snow grooming drag. A snow-cat type piece of equipment cannot utilize the various attachments we utilize to maintain the trail in the non-winter months, nor offers the flexibility required. The tractor is an integral component of our maintenance tasks for the foreseeable future of the trail.

**Document that tractors meeting the Project Requirements are not domestically available:**

In researching comparable tractors, it is clear that there is no domestic manufacturer of medium frame tractors. New Holland's T6.155 is manufactured in the United Kingdom, as well as Case IH's Maxxum 125. Kubota's M6-131, while *assembled* at its plant in Georgia, USA; is not compatible with a replacement track system and thus, cannot be used in the winter to pull the snow grooming drag. Richard Williford, of John Deere Governmental Sales stated that the U.S. Steel content of their tractors is proprietary and not publicly released, so its domestic steel content cannot be conveyed to you.

As the tractor is a required operational component of our trail system maintenance responsibilities, and is not available through a United States manufactured product, the Association requests FHWA approval to waive the Buy America provisions for the tractor on the referenced project in the public's interest.

If you have any questions, please contact me at 814-594-7825.

Scott Rodich, President

**Supplemental Information - St. Marys Area Snowmobile Association**

Equipment Information for John Deere Tractor and Loader manufactured/assembled outside United States

Federal Project Number (DCNR Project Number)	FY15-017 (BRC-PRT-21-175)
MPMS Number	107347
Project Description	Purchase of tractor with removable tracks and drag unit to maintain 175 miles of snowmobile trails in Cameron, Elk and McKean counties in PA
Total Project Cost for Waiver Items	\$89,944.19
Waiver Item 1 Description	John Deere 6120M Standard Cab Tractor (1L06120MPGG868987)
Waiver Item 1 Cost	\$80,400.26
Waiver Item 1 Country of Origin	Germany
Waiver Item 2 Description	John Deere 640R Standard Farm Loader (1P0640RXHGD004652)
Waiver Item 2 Cost	\$9,543.93
Waiver Item 2 Country of Origin	Mexico
Reasons for Waiver Request	See letter from Scott Rodich
Efforts to Locate Domestic Product	See letter from Scott Rodich
Analysis of Project Re-design	See letter from Scott Rodich