



July 20, 2022

Wyoming Governor Mark Gordon
State Capitol
200 West 24th Street
Cheyenne, WY 82009

RE: Winter Use on Hwy. 212/the Beartooths Highway between Pilot Creek, WY and Cooke City, MT

Dear Governor Gordon,

I'm President of the Wyoming State Snowmobile Association (WSSA) and am writing on behalf of our 17 local snowmobile clubs and their family members in regard to winter snowmobiling use on U.S. Highway 212 between the Pilot Creek trailhead in northwest Wyoming and Cooke City, Montana.

We recognize that flooding in the Yellowstone National Park (YNP) area last month has been devastating to that part of Wyoming and to Cooke City access in particular. As we continue to monitor this situation, we are aware that this section of highway through the Beartooths currently provides the only road access into Cooke City – but that Yellowstone's Superintendent has however stated that they intend to reestablish access between Yellowstone and Cooke City by this fall. For the sake of Cooke City's residents and their local economy – we hope that effort is successful. If not, then we fully understand that what's often referred to locally as "the plug" between Cooke City and Pilot Creek will have to be plowed this winter to provide highway access into Cooke City. So, if plowing that section of highway must occur, we are concerned that snowmobiling access to Cooke City will be eliminated – which would be devastating to Cooke City as well as Northwest Wyoming's winter economy. Consequently, we request that your office help ensure every available effort is made to establish an alternate off-highway route for the existing snowmobile trail which would be displaced from that section of Highway 212.

Several decades ago, the WSSA was instrumental in developing various local areas into what has become the great statewide network of snowmobile trails we currently have across Wyoming. And WSSA and our local clubs are particularly proud of the fact that this winter trail system that we helped build now contributes an economic impact of over \$255 million annually across our state, according to the '2020-2021 Wyoming Snowmobile Survey' recently completed by the University of Wyoming's (UW) Department of Agricultural and Applied Economics. Most importantly, this economic impact occurs during winter when local economies often need extra support to help keep our small businesses open. Highway 212 is 'the heart and core' of the Beartooth Mountains snowmobile trail system which, according to the UW study, accounts for over \$7.8 million in annual trip and equipment expenditures in the Beartooths/Park County area. So, we remain heavily vested in trying to keep this trail system viable

and offer the assistance of our local club members to help do whatever it takes to keep this particular trail system fully open.

While the recent flood event has created new, additional considerations and difficulties, the WSSA nonetheless concurs with and reaffirms the position submitted to your office earlier this summer by the Cody Country Snowmobile Association, our local club affiliate, stating that we collectively oppose any proposal to “plow the Highway 212 plug” (other than if needed on a temporary, emergency basis if needed this winter if the road access through YNP is not restored) for the following reasons:

1. Plowing this roadway would eliminate the connection and continuity between important snowmobile trails in Wyoming and Montana.
2. If the highway between Pilot Creek and Cooke City would, in fact, be converted to a plowed roadway, an alternate off-roadway route would likely not be available – and certainly would not be easy or inexpensive to accomplish – for the following reasons: A) topography and terrain in the area is difficult to negotiate, so an off-road route may be physically impossible since a snowmobile trail needs to have a minimum constructed width of at least 10- to 12-feet in order to accommodate trail grooming equipment; B) any new off-highway route would require permission and environmental clearance from the U. S. Forest Service; this would involve preparing an EA or EIS which could potentially cost several hundred thousand dollars and take years versus months to complete; C) snowmobile trails in much of this area have been under a ‘no net gain’ status due to the Lynx Conservation Rule – meaning any ‘replacement trail’ would need to be the same length or shorter than the existing roadway route or it cannot happen; given the challenging off-road terrain in this area, it is likely an impossibility that any new off-road snowmobile trail route would be shorter or even the same length as the existing, fairly direct, roadway; and D) construction of any new off-road trail route would be extremely expensive (likely in the ‘hundreds’ of thousand dollars to construct to Forest Service standards), and funding does not exist for this task.
3. Plowing this roadway would likely eliminate half of the existing revenue for the Beartooths snowmobile trail system since, on average; half is generated annually from permit sales in Cooke City. With the roadway plowed and the trail’s connectivity eliminated, there would be no opportunity or reason for riders from Wyoming to go to Cooke City, or vice versa. If this were to happen, it is likely that total revenues for the area would fall to the point there could be insufficient funds to continue maintaining any of the remaining snowmobile trail system in Wyoming (i.e., the entire Beartooths snowmobile trail system could potentially be lost). And while Cooke City currently provides a popular niche for snowmobile visitors during winter, this niche would likely disappear if the highway is plowed as a vehicle through-way.
4. Plowing this roadway would substantively decrease existing winter visitor spending in the area; the best-case scenario is that spending would likely be cut in half and the worst-case scenario is that the entire trail system could be eliminated and result in the loss of all trip expenditures and annual equipment expenditures.
5. Plowing this roadway would be expensive. All Winter Use studies in neighboring Yellowstone National Park have concluded that continued over-snow access (versus plowed roadways) is best; the same remains true for this section of Highway 212.
6. Plowing this roadway would not provide good or dependable winter access to Cooke City and Yellowstone National Park from Cody, given that motorists would have to traverse both Chief Joseph Highway/Dead Indian Pass and the Beartooths Highway which is prone to avalanches and rock slides

between Pilot Creek and Cooke City. Furthermore, Cooke City lacks the infrastructure and parking to substantively expand winter visitor use – so it would simply become a byway rather than a destination for winter motorists.

7. Additionally, it needs to be understood that, if ‘plowing the plug’ becomes reality, it is highly unlikely Park County Wyoming will continue plowing from the Chief Joseph/Highway 212 junction to Pilot Creek at its expense – so whatever the new plowing entity is on Highway 212 would need to bear the full cost of plowing approximately 15 miles from this intersection to Cooke City, versus only from Pilot Creek to Cooke City.

In summary, if Cooke City has plowed highway access through Yellowstone National Park restored by this coming winter season, the WSSA requests that your administration not give any consideration to, or funding for, plowing this section of U.S. Highway 212 during the 2022-2023 winter or subsequent winter seasons since this section of highway provides extremely important winter infrastructure as a groomed snowmobile trail for the states of Wyoming and Montana – and should remain under that management status. If, however, plowed access is not restored through YNP to Cooke City prior to the coming winter season, the WSSA requests that your administration make it clear any road plowing performed by the State of Wyoming be only on a temporary, one winter season basis – and that you subsequently also help facilitate an alternate route for the snowmobile connection to continue between Pilot Creek and Cooke City.

Thank you for past support for motorized recreation. We look forward to working with you in the future.

Thank you for your consideration.

Sincerely,



Brenda Miller, President

Wyoming State Snowmobile Association

4330 Pat O’Hara Mountain Drive

Cody, WY 82414

307-899-3431

bnbnkids@gmail.com