



June 25, 2023

Casey McQuiston, District Ranger
Clarks Fork, Greybull and Wapiti Ranger Districts
203A Yellowstone Avenue
Cody, WY 82414

RE: Beartooth Highway snowmobiling access

Dear Casey,

We're writing on behalf of the snowmobiling community regarding concerns about continued snowmobiling access on U.S. Highway 212 (the Beartooths Highway) from Cooke City, Montana to the Beartooths area of Wyoming. As you are well aware, there has been significant discussion since last year's floods in Yellowstone National Park regarding year-round access to Cooke City, including a proposal to potentially 'plow the plug' between Cooke City and the Pilot Creek parking area in Wyoming. While this proposal is not new since it's actually been floated by some for far more than a decade, it seems to have gained a bit more opportunistic momentum than it did in earlier years.

This proposal is quite concerning since it would eliminate the snowmobile trail connection between the Beartooths snowmobile trail system on the Shoshone National Forest (SNF) and important services in Cooke City, as well as the connection to other riding areas beyond Cooke City within the State of Montana on the Custer-Gallatin National Forest (CGNF). Snowmobiling has occurred on this snowed-in roadway since at least the 1970's.

As you are aware, an Environmental Assessment of the Clarks Fork Snowmobile Trail by the SNF and GNF which was signed in 1982 looked at three alternatives: "(A) manage to allow snowmobile use between Cooke City, Montana and the Beartooth Plateau by developing a snowmobile trail which, except for right-angle crossings, is completely separated from US 212 between its junctions with Wyoming 296 and Cooke City, Montana; (B) the no-action alternative – manage through yearly negotiations; and (C) manage to exclude snowmobiles from traveling between Cooke City and the Beartooth Plateau by managing US 212 for wheeled vehicle use."

The resulting decision from this Assessment was a blend of Alternatives A and B: Alternative B (no action) ultimately allowed snowmobile use to continue on Highway 212 between Cooke City and the Beartooth Plateau when there is adequate snow cover for snowmobiling, while the adoption of a portion of Alternative A led to the construction of a new snowmobile trail located off of Highway 212, for a distance of five miles between WY 296 and the current Pilot Creek parking area.

This Assessment also considered other Alternatives that were ultimately eliminated from further consideration, including: (1) develop a snowmobile trail adjacent to, but within the road prism, for the section of US 212 that would undergo snow removal – but this alternative was dismissed because much of the terrain in proximity to the highway has 40% or greater side slopes and is dominated by granite

outcrops and (2) an off-highway route north of the highway proved to be too rough of terrain and was also partially in Wilderness or Recommended Wilderness land classifications. A third unacceptable alternative considered but dismissed would have put snowmobile traffic on shoulders of the plowed roadway – a hazardous as well as illegal practice.

In respect to the current situation, pro-plowing folks are proposing that a snowmobile trail should be/could be created between Cooke City and Pilot Creek on the south side of Highway 212. We are very concerned about this unsubstantiated suggestion since it did not pan out to be a viable alternative in the 80's. Rather, there were concerns stated in that Assessment about topographical limitations, potential vegetative and environmental impacts, private lands ownership, substantial construction costs, etc. – which ultimately caused that particular proposed Alternative to not be adopted – other than the 5-mile piece between Pilot Creek and the State Highway junction. So, the question is: what has changed to supposedly make an acceptable off-highway option between Cooke and Pilot Creek suddenly viable today? Are the obstacles stated in 1982 still relevant today?

Additionally, there has been an understated need for truck/trailer parking in and outside of Cooke City if complete winter highway plowing ever comes to fruition. While that little piece has been deemed inconsequential by pro-plowing advocates, it really is a big deal since – if the highway is plowed between Pilot Creek and Cooke, and there is no new replacement trail constructed – there is absolutely not enough trailer parking available in Cooke City, so folks will need to look to the CGNF for substantially more parking outside of town on Forest Service land.

Consequently, in light of the on-going and growing push for winter snowplowing on Hwy. 212, we respectfully request that the SNF and CGNF consider conducting a new joint assessment of this proposed new snowmobile trail's viability, as well as potential new winter parking needs. Any new trail route off Hwy. 212 would need to be primarily located upon National Forest lands, so your agency will have the greatest voice as to whether their current concept would ever have a chance to get off the ground, or not.

We believe updating your previous Assessment is the only way to investigate any proposed project's viability – versus it being just more pie-in-the-sky rhetoric. We pledge our full support of a new planning initiative on this topic and will try to help in any way possible to help assure snowmobiling continues to be properly managed and accessible to the public in the Beartooth Plateau to Cooke City corridor. Please feel free to contact me if you have any questions.

Sincerely,

Bert Miller, Shoshone National Forest Liaison for the Cody Country Snowmobile Association
307-899-3419 b.miller1962@hotmail.com

Lynn Lamb, Cody Country Snowmobile Association President

Brenda Miller, Wyoming State Snowmobile Association President

Cc: Forrest Kamminga, Wyoming State Trails – Program Manager