June 2, 2022

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

RE: Plowing Hwy. 212 between Cooke City, MT and Pilot Creek, WY

Dear Governor Gordon,

This letter is in opposition to proposals to potentially plow U.S. Highway 212 during the winter season between Cooke City, Montana and the Pilot Creek trailhead in the Beartooth Mountains of northern Wyoming. This proposal is often referred locally as an effort to 'plow the plug.' I currently serve as a Director of the Cody Country Snowmobile Association (CCSA) and am its designated lead liaison on topics related to Yellowstone National Park, the Shoshone National Forest and the Highway 212 plowing issue. I have served as CCSA President as well as President of the Wyoming State Snowmobile Association (WSSA), so I have been active in snowmobile trail management in the Cody area for several decades. Our association is steadfastly opposed to this proposal since it is a bad idea which would decimate winter snowmobile recreation and tourism in the Beartooths area north of Cody.

The proposal to 'plow the plug' has been around in one form or another for more than a decade and appears to be rearing its head once again. The Cody Country Snowmobile Association has long been on record opposing any attempts to 'plow the plug.' This section of Highway 212 has been used as a snowmobile trail for the past several decades since the National Park Service, who is responsible for this section of roadway, does not provide winter maintenance/snow removal on it. Over time, this area has grown to provide important winter recreation opportunities as well support for the winter economy during what was otherwise previously a very meager economic period for many area businesses.

Our Association has worked in partnership with the Wyoming State Trails Program to operate the Beartooths Snowmobile Trail System in this area which consists of 32 miles of groomed trails and 34 miles of ungroomed trails. The groomed trails are primarily located on U.S. Highway 212, since it is not plowed during the winter season. The exception to this is the portion between the Pilot Creek Trailhead and the junction of Wyoming Highway 296 (Chief Joseph Highway), which is off-highway. The ungroomed trails are loops that connect with off-trail riding areas north and south of Highway 212 and are located in an area east of the Top of the World Store and west of Beartooth Pass.

This trail system is popular with both resident and non-resident snowmobilers and provides an important link to Cooke City, Montana and snowmobile trails maintained by Montana around Cooke City. While a full range of facilities and services for riders are available in Cody and Powell, Wyoming, the only full range of on-trail services are located in Cooke City.

The proposal to plow Highway 212 between the Pilot Creek Trailhead and Cooke City would eliminate the snowmobile trail connection between the Beartooths and important services in Cooke City, as well as the connection to other riding areas beyond Cooke City. And since snowmobile trail system funding in Wyoming is based upon the sale of snowmobile registrations and user fees (resident, non-resident, and commercial categories), eliminating trail access to Cooke City is a serious concern since, historically, up to 50% or more of all Beartooths area snowmobile permits – and over 80% of all nonresident permits – are actually sold in Cooke City. Consequently, the elimination of this linkage would likely adversely affect the financial viability of continued operation of this trail system since the next nearest permit selling agent is in Cody – 60 miles away.

Economic Impact of the Beartooths Snowmobile Trail System

The *2020-2021 Wyoming Snowmobile Survey* (Van Sandt, Coupal and Bastian – University of Wyoming Department of Agricultural and Applied Economics, May 2022) estimated that the economic impact of snowmobiling in Wyoming is over $255 million annually. For the Beartooths area (Park County, WY), daily trip expenditures by snowmobilers were estimated to total over $4.7 million per year; and when including annual equipment expenditures within Wyoming, total direct annual snowmobiling spending was over $7.8 million for the Beartooths/Park County area. See Table 1 below for a breakdown by visitor category.

Table 1: Annual Snowmobile Visitor Spending – Beartooths/Park County (Source: 2020-2021 and 2011-2012 Wyoming Snowmobile Surveys)

Visitor Category	Total Visitor Days	Average Daily Trip Expenditure	Beartooths – Total Annual Trip Expenditures	Average Total Expenditure per Visitor Day (including equipment)	Beartooths – Total Annual Expenditures (daily trip plus equipment)
Resident Snowmobilers	Wyoming: 288,175 Beartooths (3.6% of state): 10,374	$130.25	$1,351,214	$305.95	$3,173,925
Non-Resident Snowmobilers	Wyoming: 254,530 Beartooths (6.5% of state): 16,545	$200.91	$3,324,056	$280.58	$4,642,196
Commercial Outfitter Clients	Wyoming: 51,622 Beartooths (0.3% of state): 155	$171.53	$26,587	$244.55	$37,905
Total			$4,701,857		$7,854,026

Our Position: CCSA Opposes any Proposal to "Plow the Plug'

The Beartooths Snowmobile Trail System provides important winter recreational opportunities for Park County, Wyoming residents and visitors. It also generates important expenditures for the local winter economy. Our Association is opposed to plowing this highway during the winter season and urges decision makers to ***not*** pursue such an action 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 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' ever 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.

We ask that your administration not give any consideration to, or funding for, plowing this section of U.S. Highway 212 during the winter season. It provides extremely important winter infrastructure as a groomed snowmobile trail for the states of Wyoming and Montana and should remain under that management status.

Thank you for your consideration.

Sincerely,

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