

Snowmobiling and the Gateway Communities

TABLE OF CONTENTS

Cover Letter.....	3
Trails work consulting report.....	5
MAps	8
Beartooth trail map	8
Cooke City trail map.....	9
Cody country chamber of commerce – Govt Affairs minutes 6/9/10.....	10
Upper Yellowstone Snowmobile Club Letter.....	12



April 12, 2011

To Whom It May Concern:

I am writing on behalf of the Wyoming State Snowmobile Association (WSSA) and the Cody Country Snowmobile Association (CCSA) regarding our opposition to proposals to plow Highway 212 between the Pilot Creek Parking Area and Cooke City, MT. An issue paper prepared by WSSA's consultant, Kim Raap, is attached which details our concerns.

The Cooke City and Beartooth Mountains areas provide extremely important snowmobiling opportunities and these opportunities would be harmed if this roadway were to be plowed during the winter season. This 'World Class' snowmobiling area's trail networks have been built by over 30 years of efforts by grassroots snowmobile clubs and local volunteers. *SnoWest Magazine* has ranked this collective area as high as #4 in its annual "Best of the West" picks for snowmobiling, and it is consistently ranked as a 'Top-Ten' destination for snowmobilers.

This snowmobiling area which straddles the Montana/Wyoming border provides significant economic activity to what would otherwise be a dormant winter economy. We know from the *2000-2001 Wyoming Snowmobile Survey* (McManus, Coupal and Taylor – University of Wyoming Department of Agricultural and Applied Economics, October 2001) that for the Beartooths area (Park County, WY), daily trip expenditures by snowmobilers were estimated to total over \$3.8 million per year; and when including annual equipment expenditures within Wyoming, total direct annual snowmobiling spending was almost \$5.8 million for the Beartooths/Park County, Wyoming area. That is significant, and we're certain the economic impacts from snowmobiling in Park County, Montana are likely even greater since Cooke City businesses are closer to the action and thrive on snowmobiling during the winter season.

The WSSA and CCSA are adamantly opposed to what some have called "plowing the plug" on Highway 212 east of Cooke City. While some view this situation as a 'plug' (block) to their desired objectives, we view it as a critical 'connection' (link) to important services in Cooke City as well as to snowmobiling opportunities to the north of Cooke City.

Some proponents of road plowing have suggested that an elevated snowmobile trail could be created on one shoulder of Highway 212 to accommodate the existing snowmobile activity along this section of the roadway. That is simply an unsafe and unacceptable proposal. Such proposals disregard the fact there is a

considerable amount of snowmobile traffic along this corridor. The groomed snowmobile trail surface needs to be a minimum of 10-feet to 12-feet wide to accommodate two-way snowmobile traffic and trail grooming equipment; several feet of space is also required on each side of the groomed trail for snow storage (the outside berm, just as on a plowed roadway). The topography along several sections of this roadway is simply too narrow to safely accommodate two-way motor vehicle traffic on a plowed roadway, plus space for an adjoining snowmobile trail.

It has also been suggested that a new snowmobile trail could be constructed to replace the existing highway route. Unfortunately a new trail route across National Forest lands is not as easy or as simple as what some seem to believe. The surrounding terrain is quite rugged with numerous steep cliffs and drop-offs; it is also squeezed by Congressionally-designated Wilderness area to the north where motorized travel is prohibited. An expansion of snowmobile trails on National Forest lands cannot be done due to the 'no net gain' premise which governs lynx management concerns in this area.

A safe and viable over-snow trail connection to Cooke City, and the services provided there to snowmobilers, is critical to the long-term viability of the overall Beartooths snowmobile trail system on the Wyoming side of the border. The elimination of this linkage currently provided by the Highway 212 snowmobile trail route would adversely affect the financial viability of continued operation of this Wyoming trail system since half or more of existing revenue would be lost, particularly since Cooke City provides the only on-trail outlets for the sale of Wyoming snowmobile permits (and the next nearest permit selling agent is in Cody – 60 miles away).

We urge you to not support winter road plowing operations on Highway 212 between Pilot Creek and Cooke City. Please feel free to contact me if you desire additional information or would like to further discuss this issue.

Sincerely,

Bert Miller

Bert Miller
Vice President – Wyoming State Snowmobile Association
Director – Cody Country Snowmobile Association
4330 Pat O'Hara Mountain Drive
Cody, WY 82414
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Attachment: Trails Work Consulting issue paper

TRAILS WORK CONSULTING

KIM RAAP – OWNER

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**Issue Paper prepared on behalf of the Wyoming State Snowmobile Association (WSSA)
For the Beartooths Snowmobile Trail System – Park County, Wyoming
March 31, 2011**

Background and Setting

The Beartooths Snowmobile Trail System consists of 32 miles of groomed trails and 34 miles of ungroomed trails. The groomed trails are primarily located on U.S. Highway 212, which 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. Complete facilities and services for riders are available in Cody and Powell, WY; however on-trail services are available only in Cooke City. Snowmobile rentals are available in Cody and Cooke City.

Issue of Concern: Proposal to Plow Highway 212 to Cooke City

A proposal to plow Highway 212 between the Pilot Creek Trailhead and Cooke City, Montana 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. Snowmobile trail system funding in Wyoming is based upon the sale of snowmobile registrations and user fees (resident, non-resident, and commercial categories). In any given year, 49% to 58% of all Beartooths area permits are actually sold in Cooke City (see Table 1 below). Additionally, 80% to 85% of all non-resident snowmobile user fees for the Beartooths area are sold in Cooke City.

Therefore the elimination of this linkage would adversely affect the financial viability of continued operation of this trail system since half or more of existing revenue would be lost, particularly since Cooke City provides the only on-trail outlets for the sale of Wyoming snowmobile permits (and the next nearest permit selling agent is in Cody – 60 miles away).

Table 1: Beartooths Area Snowmobile Permit Sales and Revenue

Winter Season	Permit Sales Area	Total Permit Sales All Categories	Total Permit Revenue All Categories
2005/2006	Park County, WY – All Permit Vendors:	837	\$20,649 (51.4%)
	Cooke City:	794	\$19,566 (48.6%)
	Total Beartooths Area:	1,631	\$40,215
2006/2007	Park County, WY – All Permit Vendors:	870	\$21,441 (50.9%)
	Cooke City:	861	\$20,664 (49.1%)
	Total Beartooths Area:	1,731	\$42,105
2007/2008	Park County – All Permit Vendors:	903	\$22,182 (42.3%)
	Cooke City:	1,140	\$29,808 (57.7%)
	Total Beartooths Area:	2,043	\$51,990

2008/2009	Park County, WY – All Permit Vendors:	842	\$20,820 (49.5%)
	Cooke City:	866	\$21,243 (50.5%)
	Total Beartooths Area:	1,708	\$42,063
2009/2010	Park County – All Permit Vendors:	727	\$18,060 (50.7%)
	Cooke City:	682	\$17,541 (49.3%)
	Total Beartooths Area:	1,409	\$35,601

Economic Impact of the Beartooths Snowmobile Trail System

The 2000-2001 Wyoming Snowmobile Survey (McManus, Coupal and Taylor – University of Wyoming Department of Agricultural and Applied Economics, October 2001; the five sections of this report can be reviewed at <http://wyotrails.state.wy.us/Research/index.asp>) estimated that the economic impact of snowmobiling in Wyoming is over \$234 million annually. For the Beartooths area (Park County, WY), daily trip expenditures by snowmobilers were estimated to total over \$3.8 million per year; and when including annual equipment expenditures within Wyoming, total direct annual snowmobiling spending was almost \$5.8 million for the Beartooths/Park County area. See Table 2 below for a breakdown by visitor category.

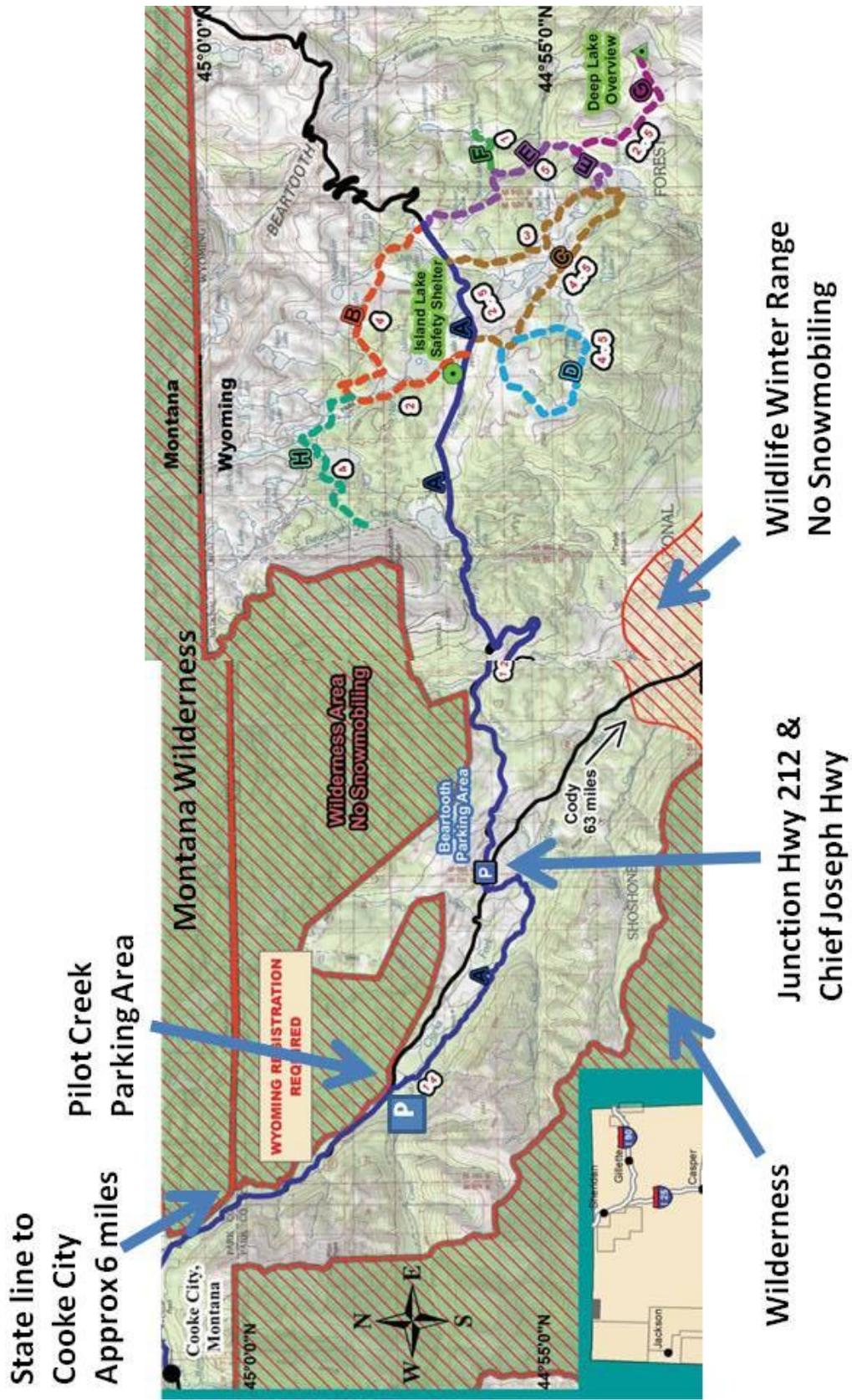
Table 2: Annual Snowmobile Visitor Spending – Beartooths/Park County (Source: 2000-2001 Wyoming Snowmobile Survey)

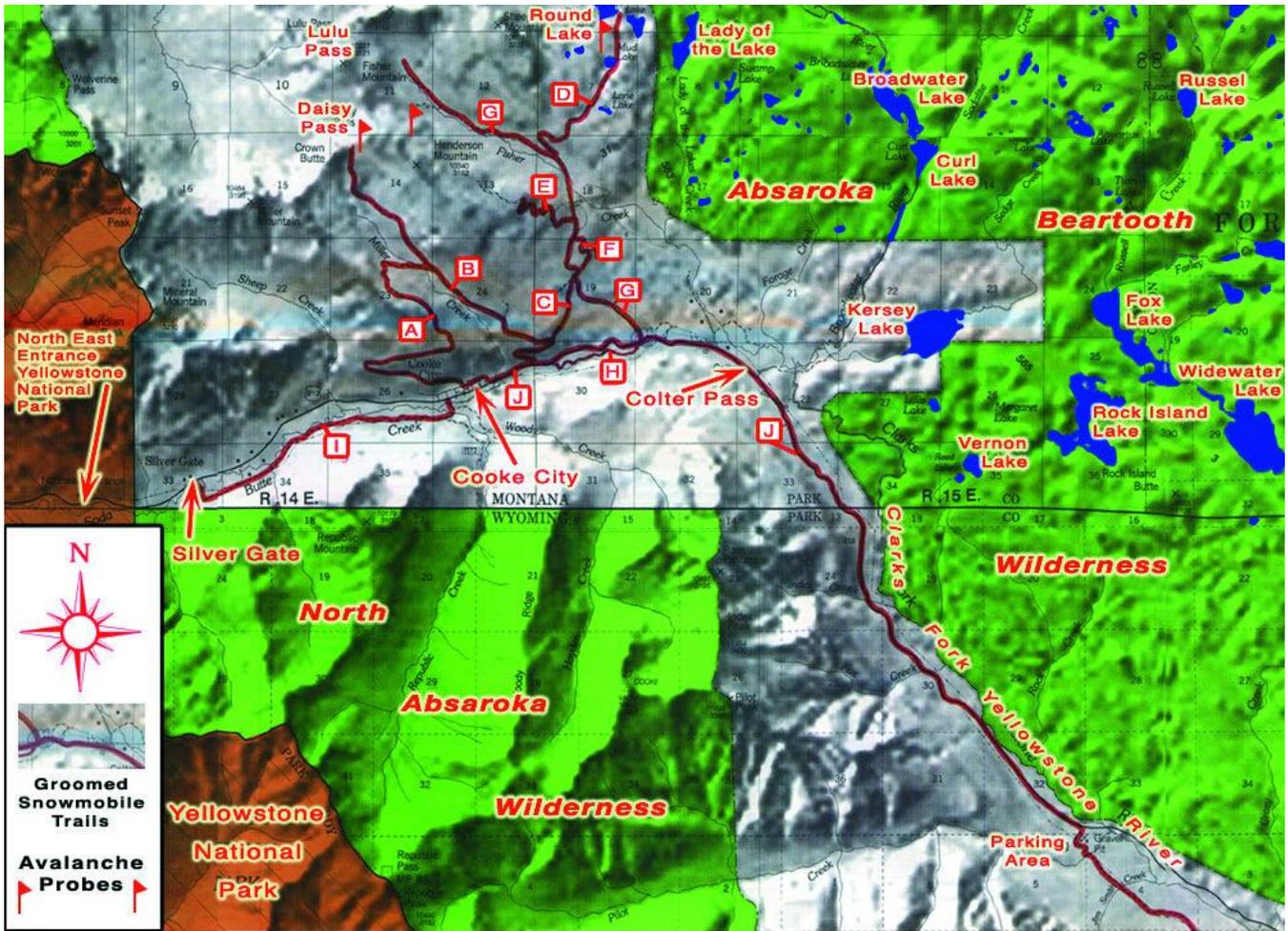
Visitor Category	Total Visitor Days	Average Daily Trip Expenditure	Beartooths – Total Annual Trip Expenditures	Average Total Expenditure per Visitor Day (including equipment)	Beartooths – Total Annual Expenditures (daily trip plus equipment)
Resident Snowmobilers	Wyoming: 764,844	\$68.50	\$1,519,330	\$123.37	\$2,736,347
	Beartooths (2.9% of state): 22,180				
Non-Resident Snowmobilers	Wyoming: 753,446	\$98.99	\$2,312,109	\$129.53	\$3,025,432
	Beartooths (3.1% of state): 23,357				
Commercial Outfitter Clients	Wyoming: 45,480	\$180.44	\$24,540	\$244.55	\$33,259
	Beartooths (0.3% of state): 136				
Total			\$3,855,979		\$5,795,038

Summary: WSSA Opposes this Proposal

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. The WSSA 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 this area are 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).
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 (\$3.8 million per year in Park County, Wyoming), along with much or most of the annual equipment expenditures.
5. Plowing this roadway would be expensive. All previous Winter Use studies in 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.





- A Miller Trail**
This trail begins by the Cooke City School on River Road. The trail is steep with several switchbacks. Miller trail intersects Daisy trail approximately 1 ½ miles from Cooke City.
- B Daisy Trail**
This trail leaves Highway 212 ¼ mile east of Cooke City and is the shortest route to the high country. The trail ends below the saddle of Daisy Pass between Crown Butte and Chimney Rock. Caution is advised on steep terrain as avalanche hazards exist.
- C Cut – Across Trail**
This 1 mile trail connects Daisy trail with Lulu trail.
- D Round Lake Trail**
This 2 mile trail leaves Lulu Trail and travels north toward Round Lake. The route travels through alpine country at high elevations where sudden storms may occur. The groomed trail ends near a US Forest Service cabin where avalanche probe poles are located
- E Henderson Trail**
This trail leaves Lulu trail and travels ¾ mile to the base of Henderson Mountain. Caution is advised on steep terrain as avalanche hazards exist.

- F Rommel Trail**
Rommel is a ½ mile loop trail that connects with Lulu trail.
- G Lulu Trail**
This trail leaves Highway 212 approximately 1 ¾ miles east of Cooke City and travels the length of Fisher Creek drainage. Lulu trail is intersected by (C.) Cut – Across,
- H Soda Butte Trail**
This 2 ½ mile trail follows the historic Bannock Trail east of Cooke City through the Soda Butte campground.
- I Bannock Trail**
This 3 mile trail follows an historic trail from Cooke City to Silver Gate. Travel with caution as several year – round residence live here, many with children. Moose are also spotted along the trail.
- J Beartooth Highway 212**
This route travels from Cooke City to the Pilot Creek trailhead in Wyoming. Beyond Pilot Creek the route is intermittently groomed to the Top – of – the – World area near Beartooth Pass by the Wyoming Snowmobile Association. A \$15 permit is required to ride on Wyoming's trails. The permit may be purchased at the Cooke City Exxon Station or Cooke City Yamaha.

**Government Affair Committee - Minutes
Cody Country Chamber of Commerce
June 9, 2010**

Present: Marc Thompson, Claudia Wade, Charles Kepler, Lou Cicco, Bob Hanson, Dick Wilder, Andy Whiteman and Dossie Overfield.

Absent: Lee Haines, Kathy McDonald, Greg Irwin, Kathleen Jachowski, Paul Sandbak and Neil Thagard.

Guests: Karen McCreery, Senator Enzi's Office, Terry Root, Shoshoni National Forest and Bert Miller, Wyoming Snowmobile Association.

Staff: Judy Sanders

Marc asked that Claudia update the committee on the latest news of the new Executive Director of the Chamber, Joe Locurto. Joe will start on June 14; he is renting a home and once his home in Nevada is sold his wife will move out to Wyoming. They will be traveling back and forth on weekends until then.

Karen McCreery started out the meeting by updating the committee on news from Senator Enzi's office and passing out pertinent information on contacting his office as well as pocket size US Constitutions and news of the Nations Christmas Tree that will be coming from the Grand Teton National Park. Karen also shared the news and concern of large semitrailer trucks with pups traveling on the Chief Joseph Scenic Highway, state highway 296, in the summer of 2011. These semis will be hauling mine tailings from the New World Mine to Whitehall, Montana for the process of extracting gold from the tailings. The New World Mine is owned by the state of Montana and with the increase of value in gold it appears the effort to extract it is worth the effort of hauling the tailings. There is a large concern about the issue of the trucks traveling that road due to its scenic and popular attraction to visitors to Cody, as well as a hazardous risk to the forest if a truck was to have an accident. There does not appear to be anything to be done to stop this large amount of truck traffic in the summer of 2011. Highway 296 is the only road available for travel out of the Cooke City area. The only restrictions on the truck hauling is the load limit, it must be within guidelines/law of the State of Wyoming.

Karen lead the discussion on information concerning the opening of Highway 212 during the winter month's into Cooke City and the Northeast entrance of Yellowstone National Park. She asked that Terry Root, Wapiti Forest District Ranger, come and address the issue due to his history and knowledge of all that would need to be accomplished and some of the costs and issues involved.

Terry Root spoke at length on the winter opening of Hwy 212 into Cooke City in the winter months. At this time the highway is closed and only used by snowmobilers in and out of Cooke City on the East end of town. The west entrance to Cooke City is plowed by the National Park Service so that residents of Cooke City have access to Mammoth Hot Springs for health care and then out the North gate for access to other Montana towns for shopping etc.

There is a lot involved in an attempt to keep that road open in the winter. It will shut down snowmobilers traveling in and out of Cooke City, which will impact Cooke City negatively at this time due to the lack of room for parking the large pick-up trailer outfits that come from the Midwest and other adjacent states. Right now the snowmobilers have adequate parking at the newly expanded Pilot Creek parking area, which is provided by the Shoshone National Forest.

Also there is the possibility that the Superintendent of Yellowstone would not plow the northeast road in YNP and close access down in the winter time, so one could only get as far as Cooke City.

Other concerns are who would plow the road? The state of Montana or the State of Wyoming, who pays for the plowing and what is the potential cost?

Another issue that would be considered a roadblock is the listing of the Canadian Lynx, which in turn does not allow any additional snowmobile trails in that area of Shoshone National Forest. If the road was to be opened and to compensate for that loss a trail would need to be 'built' and the equal amount of the new trail would close down an existing trail. No additional mileage is allowed on the current trail system.

To go any farther in this process a NEPA assessment would have to be done which can cost anywhere from \$50,000 - \$150,000. Also, a legal battle from environmental groups would most likely ensue as well as from the snowmobile associations.

Bert Miller of the Park County Snowmobile Association and Wyoming Snowmobile Association joined the conversation with comments from the snowmobile advocates viewpoint. Approximately \$5.8 million in revenue was received in the State for the winter season of 2001 from winter trail

use. The 2500 miles of groomed and marked trails is ranked top in the nation, and there is great concern that opening the highway in the winter would affectively close down the snowmobiling in Northwest Wyoming.

It was also shared that in February 2002 1,890 snowmobiles entered the East Gate into Yellowstone. In February 2010 only 14 snowmobiles entered the East Gate.

Meeting adjourned.

Next Government Affairs/National Parks Committee Meeting is July 7,
Wednesday,
2 pm in the Barling room of the Park County Courthouse.

UPPER YELLOWSTONE SNOWMOBILE CLUB
PO BOX 1111
COOKE CITY, MT 59020

3 July, 2010

To: All Concerned Parties

Re: Hwy 212 from Cooke City, MT to Pilot Creek Parking Lot, WY

Due to the "buzz" from outlying communities, organizations and within the Cooke City area concerning the potential of plowing Hwy 212 from Cooke City, MT to the Pilot Creek Parking Lot in WY we find it necessary to state our position.

We find it perplexing that organizations are conducting meetings concerning this "plowing issue" yet Cooke City residents, business owners and organizations are not being notified or invited although this issue would affect Cooke City more than any other community.

The purpose of the Snowmobile Club is to promote the sport of snowmobiling for families and individuals alike and to provide groomed and ungroomed trails for the enjoyment of all.

Since the early 1980's there has been a concentrated effort to promote the Cooke City area as a snowmobile destination area. Advertising the Cooke City trail system as it connects to the Beartooth area trail system allows us to provide 125 miles of world class trails for all levels of riding ability. This trail system is not exceptionally long but due to the diversity of what is available it provides riding to thousands of people from all over the country every year.

The parking lot at Pilot Creek is vital to the people arriving from the east as it allows them a large, clean area to park without having to drive all the way through Livingston, MT and Yellowstone National Park. The nine miles from the parking lot is groomed by Wyoming to the state line and then by our club groomer into Cooke City.

One by one the small number of snowmobiling areas in the west are being closed, thus causing more concentrated use in smaller areas.

The Upper Yellowstone Snowmobile Club does not support the plowing of Hwy 212 from Cooke City, MT to the Pilot Creek parking lot in Wyoming. Plowing that section of road will completely disrupt the snowmobiling connection between the Cooke City area and the Beartooth area; a connection that has taken years to establish. Because of the connection of the two current trail systems millions of dollars of revenue are brought into both states every year.

We do not want to lose any trail, we do not want Hwy 212 plowed.

Anxiously awaiting a reply,

Dale Dempsey, President
Representing the UYSC Membership

copies to:

DavidJacob, Project Manager
JanBrown, Executive Directory
|TimFrench, Park County Commissioner
DaveBonner, Wyoming State Representative
BillBrewer, Park County Commissioner
PatChilders, Wyoming State Representative
BuckyHall, Park County Commissioner
IngridEickstedt, Powell Valley Community Education, Executive Director, YBP Member
JillSiggins, Park County Commissioner
ClaudiaWade, Park County Travel Council Marketing Director
DaveBurke, Park County Commissioner
JoeLocurto, Cody Country Chamber of Commerce, Executive Director
CodyCountry Chamber of Commerce, Executive Director, Cody Country SnowmobileAssociation (CCSA)
CookeCity Chamber of Commerce
Jeff Moberg, Wyoming StateSnowmobile Association President
BertMiller, CCSA President, Wyoming State Snowmobile Association (WSSA) VicePresident
MikeKelly, WSSA District 5 Representative
TonySimek, CCSA Member
JustinKelly, CCSA Board Member
TerryRoot, Shoshone Forest District Ranger
ColinSimpson, Wyoming State Representative, House Majority Floor Leader, WyomingGovernor Candidate
KempONeil, District 10 Representative
DennyRehberg, Montana Representative
Max Baucus, Montana Senator
Jon Tester, Montana Senator
Robbie, MSA President
Mary May, GNF District Supervisor
Lucas Jack, UYSC Officer
Rick Sommers, UYSC Officer
Jason Flug, UYSC Vice President
Mary Dye, UYSC Secretary
Dale Dempsey, UYSC President