February 5, 2014

Moose-Wilson Road Planning Team
Grand Teton National Park
PO Drawer 170
Moose, WY 83012

Subject: Moose-Wilson Corridor Comprehensive Management Plan - Public Scoping Comment

Project: Moose-Wilson Corridor Comprehensive Management Plan (ID: 48252)
Document: Moose-Wilson Corridor Public Scoping (ID: 56561)

Dear Planning Team,

On behalf of Wyoming Pathways, thank you for the opportunity to provide comments on the Moose-Wilson Corridor Management Plan.

Wyoming Pathways is the statewide voice of people who bicycle and walk. Our goal is to encourage safe bicycling and walking – helping to create thriving communities and enhance public lands across Wyoming. People-powered activities – like bicycling and walking – provide many benefits, including efficient transportation and fun recreation. These modes of travel also enhance public health, support economic development, align with the National Park Service management policies, and are keys to reach sustainable tourism and public land access goals.

General Comments
This planning process is described in the scoping newsletter as “…initiating planning for the future of the Moose-Wilson Corridor in Grand Teton National Park.” However, in the formal listing in the Federal Register, the process is described as preparing “…a Comprehensive Management Plan and Environmental Impact Statement for the Moose-Wilson Corridor.”

It is frankly somewhat of a challenge to provide scoping comments for the start of an EIS process when it is unclear what the nature of the actual proposal is. The Scoping Newsletter asks very open-ended questions, but provides no idea of what specific proposals the Park Service may be considering. In reviewing the NPS Directors Order 12 NEPA handbook, there is consistent reference to the need to have a proposal, and potential alternatives, for the public to comment on. In this case, Grand Teton National Park has started a full EIS with no actual public proposal to comment on.
Wyoming Pathways values early engagement in public land discussions, but in this case it is unclear what proposals may be under consideration. The DO-12 handbook states “CEQ recognized that a discussion of, and public input on, options (alternatives) and their environmental pros and cons (impacts) would be valuable in making even broad policy-level decisions.” Unfortunately, the Moose-Wilson Corridor Scoping process does not provide such options or alternatives for the public to comment on.

The DO-12 also provides guidance to tier future decisions to existing park planning. In the case of Grand Teton National Park, a detailed Final Transportation Plan EIS Record of Decision was completed recently in March 2007. That multi-year process included significant discussion of the Moose-Wilson corridor, including decisions to build a pathway from the Granite Entry to LSR Preserve, and to realign the northern section of the Moose-Wilson Road along the beaver ponds to shift it east into a less sensitive area. It is unclear as to the status of the decisions made in the existing 2007 plan. We request that the NPS recognize the existing GRTE Transportation Plan ROD and build on the existing EIS with a more narrowly focused plan for the Moose-Wilson Road Corridor.

**Park Visitors and User Studies Support Separated Pathways:**
The success of the Grand Teton National Park Pathways that connect from the Town of Jackson to Jenny Lake is remarkable and should be considered in the Moose-Wilson Corridor plan. There is a strong desire for visitors to make a loop trip that includes the Moose-Wilson Road and uses the existing pathways in the park and community.

Visitor use studies have been completed by the NPS as part of a million dollar pathway research expenditure show extremely high visitor satisfaction with the new park pathways. Visitors have embraced the new mode of access, and companion pathway/wildlife studies show negligible impacts on wildlife. These visitor studies should be recognized in the Moose-Wilson Corridor plan, supporting the need for pathway facilities in the Moose-Wilson corridor.

Wyoming Pathways would like to specifically note the following two studies, which are attached as part of this comment: *Evaluation of Non-Motorized Use in Grand Teton National Park Phase II: Post-Pathway Construction* by McGowen, Gleason, and Hansen; and *Analysis of Nonmotorized Use in Grand Teton National Park, 2010* by Eric Hansen.

Significant findings in the studies include:

- Non-motorized use increased nearly ten-fold after the pathway was constructed.
- With the pathway, non-motorized travelers felt safer and were more satisfied with nonmotorized travel options in the park.
- The type of non-motorized travelers in the park changed with the construction of the pathway. Proportionally, there were more older travelers, more children, more females, larger groups and more non-locals.
To quote the Hansen study conclusion,

“...the one major suggestion given by almost everyone riding the pathway; Extend the shared use pathway. People love the pathway and want it to go farther. People want to get out of the car. People want to feel Grand Teton National Park. On a bicycle it blows in your face, it can be smelled, it is seen unobstructed, and the slower pace allows time for it all to soak in.”

**Grizzly Bear Scare Unfounded:**

One area of concern to Wyoming Pathways is the increasingly over-stated concern that grizzly bears may pose a special threat to bicycle and pedestrian visitors along a Moose-Wilson pathway. One would think that cyclists are a special food bears seek. The truth is, bears are common in many areas of Grand Teton National Park, the surrounding National Forest, National Elk Refuge, and on private lands in Teton County. Visitors, including cyclists and pedestrians, safely enjoy millions of trips in bear country every year with overall very low incident of conflicts. It would be inappropriate to treat bicycle and pedestrian use along the Moose-Wilson as somehow a more dangerous activity than other types of visits. Park visitors - including cyclists, pedestrians, and people in vehicles - enjoy many other areas of Grand Teton where bears are frequently present, and there are no cases of bear-bike altercations on record in Grand Teton National Park. In a recent search of fatal bear attacks in North America over the past 100 years, it is clear that bicycles and bears are not in any way a major problem.

The park does a good job with education and minimizing conflicts between people and bears, and this should be the approach along Moose-Wilson. Should the NPS be concerned about bear-visitor encounters, it would be more appropriate to develop a park-wide plan to minimize human-bear conflicts. Its not appropriate to single out the Moose-Wilson for bear conflicts when grizzly bears and people can be seen in close proximity at Oxbow bend, Signal, Jenny Lake, Beaver Creek, Moose park headquarters, along US-29/89, numerous other front-country locations, as well as potentially along any of over 200 miles of hiking trails in the park.

**Recommended Purpose and Need:**

Wyoming Pathways views a well-defined purpose and need as critical elements of the NEPA process, and the public must be provided an opportunity to help shape those. Towards that, we request that this seemingly premature scoping process be continued with the public, and that the NPS offer additional scoping comment opportunities once an actual proposal is developed. It would fail the public NEPA process for a draft EIS to be created before there is even a scoping proposal that includes a purpose and need, and proposed actions or alternatives.

There is a need to provide long-term management of visitor access along the Moose-Wilson Road to maintain a positive visitor experience. There is a need to maintain historic public road access, along with the need to add a bicycle and pedestrian pathway along the Moose-Wilson Road to offer safe access for these users, and improve the visitor experience while protecting park resources.

The purpose of the project should be to develop adaptive management policies to manage traffic along the Moose-Wilson road in a manner that maintains the visitor experience,
minimizes traffic growth, reduces vehicle impacts on wildlife resources, and allows continued two-way traffic. The purpose of the planning process should reaffirm the current Transportation Plan that calls for a realignment of portions of Moose-Wilson Road to separate vehicle traffic from sensitive wildlife habitat. The road realignment should also include designated pullouts and wildlife viewing areas so visitors can continue to safely view moose and other wildlife in the area. The purpose should include the pathway from Granite to LSR envisioned in the current Transportation Plan, and expand that pathway to connect to Moose.

Wyoming Pathways supports a complete pathway along the Moose-Wilson Road corridor. We further support maintaining the slow, rural character of the existing road while providing safe access for bicyclists and pedestrians with a complete pathway. The 2007 Transportation Plan EIS includes a 3.5-mile pathway approved from the SW entrance to the LSR Preserve; however there is a need to close the remaining 3.5-mile gap from LSR to Moose, which completes a larger 30-mile loop. There is a significant latent demand and need for a complete pathway due to safety concerns for children, families, visitors, and residents who are biking, hiking, walking, or operating a wheelchair. This latent demand is shown on the Jenny to Moose Pathway Study, where use increased 10-fold once the pathway was an option.

We would ask the park to prioritize public safety and add a complete pathway from the Granite Entrance to Moose - connecting to the incredibly successful and widely celebrated Grand Teton National Park and Jackson Hole Community pathway systems.

Open ended National Park Service Questions:

**Question 1: What do you value most about your visits to the Moose-Wilson corridor and why?**

- Bicycling, walking, and cross-country skiing along the road to visit the park and experience the park, safely view wildlife and be in nature.
- Two-way public motor vehicle access along the Moose-Wilson corridor to visit the park.
- Slow speeds and the narrow, unimproved nature of the road that naturally calms traffic flow, and as a result has very low accident rates between vehicles and wildlife compared with the main US-26/89 Highway or the Teton Park Road.
- Preservation of historic access and public experience of the road corridor that gives an opportunity for the public to experience this part of Grand Teton National Park.
- Access to public trailheads at Granite Creek, LSR, and Death Canyon.

**Question 2: What do you think are the most important issue affecting the Moose-Wilson corridor? Issues can be concerns, opportunities, or topics needing further discussion.**

- Historic two-way access should be maintained with the addition of a complete pathway for safety for non-motorized visitors.
- The pathway approved from the Granite Entrance north to the Laurance Rockefeller Preserve should be extended from LSR to Moose, so that cyclist, hikers and vehicles are not in conflict. Moving the road in the north section provides an ideal time to also create a pathway alongside.
• A pathway addition does not mean developing or improving the road, it simply means that bike and pedestrian use that is already happening will be safe.
• Smartly planned pullouts for wildlife viewing should be added that allow visitors to walk along the pathway and watch wildlife outside of their cars.
• Keep the road corridor narrow and unimproved, but add a complete pathway for safety of cyclists and pedestrians. Maintaining the historic width and curvilinear nature of the Moose-Wilson Road (current width is 18-20’) is an important issue to keep vehicle speeds low. Any road realignments must maintain this historic width.
• It’s important to offer safe opportunities for people to get out of their cars and on bikes or to walk – this can alleviate traffic numbers and improve the visitor’s experience.
• The park should work more collaboratively with Teton County, Town of Jackson and Teton Village to integrate and use transit solutions and transportation demand strategies to reduce vehicle use throughout the park, including the section from Teton Village to Moose, provided that transit is a part of a larger transit system that connects the park and community and which provides quality access for park visitors.
• Develop adaptive management measures to maintain low vehicle numbers through coordination with the Jackson community on transit, TDM, and pathway development.

Question 3: Do you have any comments about the fundamental resources and values for the Moose Wilson corridor as described in the newsletter?
Actually, a majority of fundamental resource issues in the Moose-Wilson Corridor have been resolved over the past 20 years. This suggests that the Moose-Wilson planning process should be narrowed to focus on the remaining road and pathway access and safety issues. Major issues already resolved include:
• The JY Ranch has been successfully transferred to the National Park Service;
• The future use of White Grass Ranch has been determined;
• The Army Corps has upgraded the levee access road and bridge over Lake Creek and with the NPS determined the necessity to maintain the Snake River levee;
• Numerous historic roads and some trails have been removed from the corridor.
• Many former private properties such as the Hartgrave place, Resor properties, and most recently State of Wyoming Lands in the Moose-Wilson corridor have been acquired by the National Park Service, enhancing current land protection in the corridor to the best level ever.
• Wildlife is thriving in the corridor.

Question 4: What aspects of the Moose-Wilson corridor do you hope will continue into the future? What changes would you like to be made in the corridor for the future?
• Historic access should be maintained with the addition of a complete pathway for safety. The Moose-Wilson Road is a historic two-way facility used by visitors long before the creation of Grand Teton National Park – that history and access should be respected.
• The Moose-Wilson Road has been determined to be eligible for the National Register of Historic Places by the Wyoming State Historic Preservation office. That historic
character includes the two-way access and should be maintained along with the addition of a complete pathway for safety.

- One change recommended is that the National Park Service and Grand Teton National Park need to take a more proactive role in creating on a collaborative working relationship with Teton County, the Town of Jackson, and Teton Village. The local government partners share the parks interest in creating safe, sustainable and convenient public access to Grand Teton while protecting park resources for future generations. The local governments are strong supporters of Grand Teton National Park, and can assist the park in managing public access and minimizing impacts.
- The possible addition of transit, planned in context with a community START bus and Grand Teton National Park transit system, could be considered. There are significant resources in the community that could be developed in collaboration with the NPS.
- Transportation Demand Management strategies should be incorporated in the adaptive management plans which can help manage use and access demands.

Question 5: What other comments or suggestions do you have?

- Narrow the scope of this EIS to the road corridor itself, which is approximately 7 miles of roadway from the Granite entry to Moose.
- Shorten the time and reduce high cost of the EIS by tiering it off of the 2007 FEIS and Record of Decision on the Grand Teton National Park Transportation Plan.
- The planning process for the Moose-Wilson Corridor needs to incorporate the interrelated nature of public access needs for park visitors. The main highway from Jackson to Moose and the Moose-Wilson Road are both critical components of the park and community transportation systems. Changes that would restrict access to the Moose-Wilson corridor would have potentially significant negative impacts on other park roads and resources as well as to the community. Transportation systems are in some ways similar to natural systems; changes to one area can impact other areas with negative consequences.
- It is critical to note that the Moose-Wilson Corridor is not an isolated canyon, but a connected part of the larger Jackson Hole area. Its not just the 10,000 acres that are environmentally important, nor just the remaining 300,000 acres of Grand Teton National Park, but the entire landscape of Jackson Hole that includes the park, parkway, forest, refuge, and many protected private lands.
- The National Park Service should recognize, use, and include, the social science user studies that have already been completed on the park pathways. The results are highly encouraging – visitors using the pathways felt safer; they were more diverse – more women, children, more non-local visitors.
- The results of the pathway user studies are exceptionally encouraging when compared to the NPS vision “A Call to Action – Preparing for a Second Century of Stewardship and Engagement”. The first of four themes is “Connecting People to Parks”, with goals to “Expand the use of parks as places for healthy outdoor recreation that contributes to people’s physical, mental, and social well-being,” and “Welcome and engage diverse communities through…experiences that are accessible to all.” Clearly, the Grand Teton Pathways are helping the Park Service achieve its mission
now and looking forward to the next century of protecting and enhancing our National Parks.

Thank you again for the opportunity to comment. Please continue to keep Wyoming Pathways informed on the next steps in this planning process.

Sincerely,

Tim Young
Executive Director

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Attachments:
2. Analysis of Nonmotorized Use in Grand Teton National Park, Eric Hansen, 2010