



BOARD OF COMMISSIONERS

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September 28, 2026

The Honorable Doug Burgum
Secretary of the Interior
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

Re: Moose-Wilson Corridor Comprehensive Management Plan Record of Decision Amendment

Dear Secretary Burgum:

The Teton County Board of County Commissioners writes to express our disappointment with the National Park Service's August 14, 2026, amendment to the Moose-Wilson Corridor Record of Decision. The amendment adds a separated multiuse pathway along the length of the corridor and realigns a segment of the road. We ask the Department to reconsider the corridor-length pathway decision and to meet with the County before further implementation.¹

Teton County was a cooperating agency in the original Environmental Impact Statement. In January 2016, the Board commended Grand Teton National Park staff for a "thorough, open and inclusive process" that balanced resource protection with access and recreation. We supported the preferred alternative and the road's narrow, slow-speed character. Although we strongly support bicycle and pedestrian safety, we expressly opposed a separate pathway along the entire corridor. We recommended traffic calming and consideration of targeted climbing lanes where the speed difference between vehicles and cyclists creates the greatest safety concern. We reaffirm that position and attach our 2016 letter here.²

The amended decision selects pathway and road realignment elements of Alternative D that the 2016 decision dismissed. The Park Service says it revisited the decision to align

¹ [National Park Service, Moose-Wilson Corridor Comprehensive Management Plan, Record of Decision Amendment \(Aug. 14, 2026\), pp. 1-2, 5-6.](#)

² Teton County Board of County Commissioners, Moose-Wilson Corridor Preferred Alternative Comment Letter (Jan. 26, 2016), pp. 1, 3 (attached).

with Executive Order 14314's direction on recreational access. The amended decision also acknowledges that the 2016 analysis identified increased wildlife disturbance, habitat loss, and fragmentation from a second human-use corridor, as well as impacts to vegetation, visual quality, historic character, and archeological sites. The amendment describes refinements and mitigation intended to reduce those effects and identifies potential benefits from moving a portion of the road away from the wetlands. Those measures do not erase the County's concern about placing a new, corridor-length pathway through this exceptionally wildlife and culturally rich landscape.³

We are particularly disappointed by the process through which this change was made. The County was not invited to take part in the 2026 reevaluation as a cooperating agency and did not have a meaningful opportunity to discuss the proposed change prior to the decision. The amendment reports renewed Tribal and historic-preservation consultation, a 15-day public comment period on a draft Section 106 programmatic agreement, and Endangered Species Act consultation. There was not a renewed opportunity for the County or the broader public to address the fundamental choice to add the pathway.⁴

This approach is difficult to reconcile with Secretary's Order 3434, *Strengthening Coordination with Gateway Communities*. The Order recognizes gateway communities as key stakeholders, calls for transparent and ongoing communication with their leaders, directs park units to document and consider local input in environmental planning, and requires early engagement on changes that may affect local access. It also calls for timely incorporation of community input into park planning and decisions. Teton County and Grand Teton National Park have worked together for years on transportation, visitor use, emergency response, and resource protection. The 2026 amendment should have drawn on that relationship.⁵

Congress directs the Park Service to conserve park scenery, natural and historic objects, and wildlife while providing for their enjoyment in a manner that leaves them unimpaired for future generations. We support appropriate access and have invested in pathways and alternative transportation throughout Teton County. That commitment makes it especially important to decide where a pathway belongs through careful analysis of the Moose-Wilson corridor's resources, not through a predetermined outcome.⁶

We respectfully request that the Department reconsider the requirement for a separated pathway along the full Moose-Wilson corridor. Before moving forward, we ask that you meet with our Board and other affected local partners to review the decision, consider the

3 National Park Service, *Record of Decision Amendment*, 5–6, 9–10, 16–17.

4 National Park Service, *Record of Decision Amendment*, 6–7 (summarizing public, Tribal, and agency consultation).

5 U.S. Department of the Interior, Secretary's Order No. 3434, *Strengthening Coordination with Gateway Communities* §§ 5–6 (June 25, 2025).

6 54 U.S.C. § 100101(a), (b)(2).

County's 2016 comments, and discuss additional opportunities for meaningful engagement under Secretary's Order 3434.

Our concerns are focused on the decision and the process, not at the Grand Teton National Park employees who live and work in our community. The original planning effort showed the value of their expertise and importance of sustained collaboration with cooperating agencies and the public. We urge the Department of Interior and National Park Service to restore that collaborative approach.

Respectfully submitted,

Mark Newcomb, Chair
Teton County Board of County Commissioners

Attest: Maureen E. Murphy
Teton County Clerk

Attachment: Board of County Commissioners' comment letter, January 26, 2016



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Commissioners

Barbara Allen, Chair
Mark Newcomb, Vice Chair
Natalia D. Macker
Smokey Rhea
Paul Vogelheim

January 26, 2016

Superintendent David Vela
Grand Teton National Park
P.O. Box 170
Moose, Wyoming 83012

Re: Moose-Wilson Corridor Preferred Alternative Comment Letter

Dear Superintendent Vela:

We thank Grand Teton National Park staff and other members of the Moose-Wilson corridor analysis team for crafting the NPS Preferred Alternative for the Moose-Wilson corridor. We do not believe this alternative is perfect, and in this letter we offer several suggestions for improvement, but you have largely succeeded in creating a plan that balances resource protection with public access and recreational opportunities. We applaud your thorough, open and inclusive process.

It continues to be the goal of this commission, and our community as a whole, to support the National Park Service in your effort to maintain the unique character of this byway. We support your efforts to maintain the narrow, slow-speed rural character of the Moose-Wilson Road and reject suggestions for a higher speed, higher capacity roadway. Most importantly, we support your efforts to reduce traffic and resource impacts – while still providing meaningful public access. As a Cooperating Agency, we appreciate the opportunity we have to help shape this plan. We take seriously our responsibility to meet our community needs while supporting you in your efforts to meet your overarching mission, as described in the Organic Act of 1916: “... *to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.*”

There are many positive elements in the Preferred Alternative – several highlights:

- 1) We support your efforts to protect the important cultural and archaeological site in the vicinity of the Sawmill Ponds Overlook, known as Site 48TE498.
- 2) We appreciate that the Preferred Alternative employs a sustainable transportation management model, in which the Park has identified management objectives and intentional final corridor conditions, rather than, as is more typical with transportation models, simply expanding roadways in reaction to visitor demand.
- 3) We support the road realignment and new entrance station proposed at the north end of the corridor. This new entrance station will provide the Park with additional tools to more effectively manage the corridor.

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- 4) We support rebuilding and paving the current gravel sections to a width comparable with the other paved sections. Installed properly, this will provide a safer experience for all users – as drivers will be able to focus on other corridor users rather than being distracted while attempting to dodge potholes. As well, paving will benefit the resource (groundwater and vegetation) as it eliminates the use of dust-control chemicals. Although counter to most roadway design, it is imperative that the newly paved section continues the uncomfortably narrow width, sharp curves and poor sight distance of the other roadway segments. This will produce high “visual friction” and traffic calming – resulting in lower speeds. As noted in the Federal Highway Administration Road Safety Audit, these “deficiencies” provide effective traffic calming resulting in a remarkably safe road for vehicles and wildlife.
- 5) We support reducing the speed limit to 20 mph and implementing (in cooperation with Teton County and the Wyoming Department of Transportation) a robust Intelligent Transportation System. The ITS messaging program will provide information about road conditions (travel time, animal jams, transit/pathway availability, etc.) that will allow visitors and residents to make more informed route and mode choices.

We have concerns and/or request consideration of the following:

- 1) **Vehicle Cap** – We support a fact-based, rational limit on vehicles in the Moose-Wilson corridor. Your analysis has not convinced us that the proposed cap (200 vehicles and/or 550 people) both adequately protects Park resources and provides sufficient access opportunities for visitors. We request the Park continue to involve Teton County in implementing an adaptive management approach to these limits – as an overly restrictive cap could unnecessarily limit public access to this unique area, harm our community, and erode support for the Park. Reducing vehicles in the Moose-Wilson corridor is a worthy goal, but unnecessarily limiting human access is not. It is important to find the right balance. We respectfully request, as a Cooperating Agency, additional opportunity to help shape this policy and address these related concerns:
 - a. **Queuing Lanes and Access** – We are concerned that the proposed threshold limits and queuing lanes will negatively impact access to the Park for bicyclists and nearby residents, as well as impact air quality. How will residents located inside the southern Park boundary or in close proximity to the Granite Canyon Entrance Station access their homes when long lines of idling vehicles are queued to enter the Park? At what threshold will bicycles no longer be permitted to bypass the queuing lanes? How will the Park address air quality impacts generated by these queuing vehicles?
 - b. **Indicators and Thresholds** – We are not convinced that the “vehicle-free viewscape” indicator and 70% vehicle- and bicycle-free viewshed threshold is valid or measurable. Strict interpretation of this indicator may unnecessarily limit both bicycles and vehicles. We ask that you provide additional rationale and support for this indicator. As well, we support the Park’s current policy, as outlined on Page 51 of the Draft Environmental Impact Statement, of allowing bicycle users to bypass the entrance station queuing lanes.
- 2) **Transit** – Alternative C briefly mentions that future management measures may include consideration of “a corridor reservation system and/or transit.” Properly managed, transit (small buses or vans) could help limit the growth of private vehicles in the corridor, more effectively protect the character and resources, and provide sufficient public access. Additionally, transit could give visitors wonderful opportunities to view wildlife. Vans, with

well-trained drivers, could continue to traverse the corridor, without harming wildlife and without wildlife harming people.

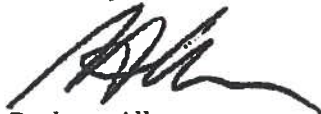
We are sensitive to the risks of overwhelming the Moose-Wilson corridor with an overly aggressive transit system and therefore recommend the Park take an adaptive management approach to transit, in coordination with the vehicle cap threshold. Teton County and the Town of Jackson recently adopted the Integrated Transportation Plan (ITP). The ITP will rely heavily on transit to help reduce the growth of single-occupancy vehicle use in our valley. We believe a successful transit program in the Park could help our community achieve these traffic-reduction goals and reduce impacts to Park resources. Therefore, as a Cooperating Agency with a successful transit system of our own, we offer our expertise and look forward to coordinating and partnering with you on our collective transit efforts.

3) **Safety for Cyclists, Walkers, and Motorists** – At this time, consistent with the Preferred Alternative, we do not support a separate pathway along the entire corridor. However, the Preferred Alternative must do more to protect these users and find ways to encourage Park visitors to get out of their cars and explore the Moose-Wilson corridor via quieter and less impactful means. Several options:

- a. **Traffic Calming** - Maintaining the narrow and winding character of the roadway and implementing (and enforcing) a 20 mph speed limit are positive steps. We recommend the Park evaluate additional design and traffic calming measures that will encourage motorists to drive slowly and lessen the need for on-the-ground enforcement.
- b. **Climbing Lanes** - The safety issues for cyclists and pedestrians are generated primarily by the relative difference in speed between motor vehicles, cyclists, and pedestrians. On downhill and flat sections, many cyclists can maintain speeds similar to vehicles. However, on the steep uphill roadway segments (between the Levee Access Road and LSR), this speed differential is most pronounced. We encourage the Park to consider installation of short, one-way, narrow (5' wide), bicycle climbing lanes on these steeper hills. These paths would closely parallel the roadway, rather than widening the roadway. Due to the close proximity to the road, narrow width, and low (uphill) speeds, these one-way paths should minimize resource impacts, minimize habitat fragmentation, reduce the likelihood of surprising a bear (slow uphill speeds and proximity to the road), and allow for a wider range of users.

We thank you for including us in this important process and for considering our comments. We look forward to opportunities for additional collaboration in the coming months.

Sincerely,



Barbara Allen,
Chairwoman

Attest:



Sherry L. Daigle
County Clerk



Cc: The Honorable Matthew H. Mead, Governor, State of Wyoming
Jackson Town Council