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October 5, 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 (ROD). The amendment adds a separated multiuse pathway along the length of the corridor and realigns a segment of the road.¹ We ask the Department to reconsider the corridor-length pathway decision and include Teton County's input as a cooperating agency before proceeding.

We are particularly disappointed by the process through which this change was made. The County was an active participant as a Cooperating Agency in the 2016 ROD, but we were not invited to take part in the 2026 reevaluation 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, but no renewed opportunity for the County or broader public to address the fundamental decision to add the pathway.²

This approach is difficult to reconcile with Secretarial Order 3434, *Strengthening Coordination with Gateway Communities*. The Order establishes Department policy to "Recognize gateway communities as key stakeholders" and to "foster transparent ongoing communication between System units and gateway leadership." It further directs the National Park Service to provide "early notification on major changes," document and

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

² National Park Service, *Record of Decision Amendment*, 6–7 (summarizing public, Tribal, and agency consultation).

consider local input in environmental planning, and engage gateway communities on decisions affecting local access.³ Teton County and Grand Teton National Park have worked together for years on transportation, visitor use, emergency response, and resource protection. Given that history and the clear direction of Secretary's Order 3434, the 2026 amendment warranted earlier and more meaningful engagement with the County and the broader gateway community.

As a cooperating agency in the original Environmental Impact Statement (EIS), 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 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 for reference.

The amended decision selects pathway and road realignment elements of Alternative D that were not selected in the 2016 decision. The Park Service says it revisited the decision to align Executive Order 14314’s direction on recreational access.⁴ 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 resolve the County’s concern about placing a new, corridor-length pathway through this exceptionally wildlife and culturally rich landscape.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.⁶ Executive Order 14314 expressly provides that it “shall be implemented consistent with applicable law,” and therefore does not displace that statutory mandate. We support appropriate access and have invested in pathways and alternative transportation throughout Teton County. That commitment makes it especially important that the location and extent of any pathway be determined through careful analysis of the Moose-Wilson corridor’s resources and reasonable alternatives.

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

4 Executive Order No. 14314, *Making America Beautiful Again by Improving Our National Parks*, 90 Fed. Reg. 30,201 (July 9, 2025).

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

6 54 U.S.C. § 100101(a), (b)(2).

We respectfully request that the Department reconsider the requirement for a separated pathway along the full Moose-Wilson corridor. Before proceeding, we ask the Department to conduct further analysis of alternatives that support recreational access other than a separated pathway; to further analyze changed conditions since the 2016 Record of Decision; to engage Teton County and other affected local partners as cooperating agencies; to consider the County's 2016 comments; and to provide additional opportunities for meaningful gateway-community engagement consistent with 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 demonstrated both the value of their expertise and the importance of sustained collaboration with cooperating agencies and the public. We urge the Department of the 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