

January 28, 2016

David Vela, Park Superintendent,
Grand Teton National Park
P.O. Drawer 170
Moose, WY 83012-0170

Subject: Jackson Hole Conservation Alliance's Comments on the Moose-Wilson Corridor Comprehensive Management Plan Draft Environmental Impact Statement

Dear Superintendent Vela,

The Jackson Hole Conservation Alliance (Alliance) appreciates the opportunity to provide comments on the Moose-Wilson Corridor Draft Comprehensive Management Plan / Environmental Impact Statement (DEIS). The Alliance has a long and positive relationship with Grand Teton National Park (park) and we look forward to working with the park through this process to develop a plan that effectively protects park resources and wildlife, while enhancing the visitor experience.

We appreciate and commend you and your staff for the exemplary fashion in which this process has been conducted. We recognize the significant effort and study that has gone into gathering relevant data for making management decisions. We also thank you and your staff for taking the time and effort to transparently engage with and explain the planning process to us, and to the community. We hope that you will continue this open, science-based process and trust that the final decision will emerge from this process, free of any political interference.

Below, we provide suggestions directed at improving the Park's preferred Alternative C (Alt C), as identified in the DEIS. Our suggestions are motivated by these guiding beliefs:

Guiding Beliefs

- The Moose-Wilson corridor (MWC) is a unique part of the Greater Yellowstone Ecosystem and Grand Teton National Park that harbors a diversity of wildlife, habitats, streams, rivers, and scenic resources. It provides an unparalleled chance to experience some of Grand Teton's most spectacular wildlife, habitat, and scenery. The National Park Service has an obligation to protect and preserve these resources and must focus their efforts on doing so.

- The Moose-Wilson Corridor Comprehensive Management Plan should focus on long-term protection for wildlife and habitat in the Moose-Wilson corridor while making it easy and safe for people to visit this unique area on foot, bicycle, or public transit.
- The Moose-Wilson corridor is not a transportation corridor for people trying to drive across the county. It is a special place to visit in Grand Teton National Park because of its rich wildlife habitat and abundant recreational opportunities.

Overall, the Alliance believes that the preferred alternative takes a few steps in the right direction – like limiting the number of cars in the corridor to 200 at any one time, reducing the speed limit to 20 mph, and improving the road surface to increase safety for people on foot or bikes. We suggest some improvements for the park to consider that could help the plan more effectively provide appropriate opportunities for visitors to use, experience, and enjoy the area while protecting park resources.

Suggestions for improving Alternative C

Vehicular Cap

Increasing vehicular traffic on the road is by far the biggest issue impacting the corridor resulting in resource damage from overflow parking (DEIS, pg 223) and posing a challenge to the visitor experience. The park should take more aggressive measures within the existing developed footprint to reduce traffic while also protecting natural resources and making it a safer and a more pleasant place to visit. As currently defined, the 200 vehicle cap corresponds to a peak level met on only a few days in the busiest seasons. We appreciate the adaptive management approach to evaluating the suitability of this cap based on the chosen indicator of providing vehicle free view sheds. However, we believe that a lower cap would encourage visitors to get out of cars and seek more active forms of experiencing the corridor. A lower cap could also be combined with corridor-appropriate transit that serves popular trailheads and the LSR preserve. Fewer vehicles driving within the park would have potential benefits of reducing greenhouse gas and other emissions that may be associated with our class I air shed.

Engineer the road for slow speeds

Please consider engineering the road for slow speeds, in addition to signage displaying the reduced speed limit. By engineering the road with additional traffic calming measures such as speed bumps similar measures we can better ensure that drivers comply with posted speed limits. This furthers safety for people on foot or bike who may share the road. Research shows that shared, slow-speed streets are some of the safest for people to walk and bike. In particular, we bring the park's attention to two studies of bicycling infrastructure in Canada. The first shows that slow, local streets shared with bicycles and vehicles can be significantly

safer, in some conditions, than multi-use pathways (Teschke, K., et al 2012. Route Infrastructure and the Risk of Injuries to Bicyclists: A Case-Crossover Study. *American Journal of Public Health*, 102(12), 2336–2343. doi:10.2105/AJPH.2012.300762). A second study (Vijayakumar and Burda 2015. *Cycle Cities*. Pembina Institute, Calgary, Canada) evaluated cycling infrastructure across several Canadian cities and showed that the city of Vancouver had the lowest number of crashes per cyclist when the majority of their bicycling infrastructure are signed routes on residential streets shared with cars. In some ways a slow-speed, shared Moose-Wilson road would be comparable, in terms of traffic, to a residential shared street.

Consider corridor-appropriate shuttles

In 2009, Grand Teton National Park studied the potential for public transit in the National Park (Kack and Chaudhari 2009). This report suggested four potential transit routes, including a possible route between Moose and the LSR preserve. One conclusion of that study was that transit would be desirable and supported among visitors and park employees, but would only be necessary when traffic and parking congestion occurs. Based on visitation this past summer, we argue that congestion is currently an issue and the time is appropriate to reconsider transit, especially within the Moose-Wilson corridor. We urge the park to analyze options for corridor-appropriate shuttle or van transit, building on past studies, within the specified adaptive management framework and conforming to vehicle and visitor limits. Such transit could even be combined with an interpretive service that provides visitors with greater information on the natural and cultural resources within the corridor.

Shrinking the size of parking lots

We urge the park to consider a smaller parking lot at the Death Canyon trailhead. The current plan proposes a parking lot for 80 cars – 40% of the 200 car vehicle cap in the corridor at one time. This number of cars at the trailhead also corresponds to a peak parking demand that is met at only peak periods; according to the Park's own visitor use studies. We believe a parking lot of 60 cars would be a more appropriate design. Again, such a move would be in line with the general desire for fewer cars in the corridor, having smaller parking lots and encouraging more human-powered travel.

Maintaining vegetation along the road

We are concerned by the park's proposal to create vegetation setbacks along the road section between Sawmill Ponds and Death Canyon (DEIS, pg 52). Vegetation along this road section represents some of the best seasonal bear habitat (berry patches). We recognize that this habitat represents a source of human-wildlife encounters during some seasons. We prefer to see those encounters managed through other measures such as road closures or wildlife brigade staffing increases rather than by removing valuable bear habitat.

Consider a balance between cultural and natural resources

Finally, we urge the park to consider if any options exist to protect wetlands along the existing northern section of the road if the road was realigned further east. We recognize the significance of the new archeological finds. We wonder, if in the long-term, there may be options for a culturally sensitive approach to relocating this section of the road away from the wetlands without destroying archeological finds.

Thank you again for the opportunity to comment on this draft management plan and DEIS.

Sincerely,



Siva Sundaresan
Conservation Director