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July 9, 2026

National Park Service
Planning, Environment & Public Comment
P.O. Box 170
Moose, WY 83012

Re: Draft Programmatic Agreement for the Moose-Wilson Road

Dear NPS Planning, Environment & Public Comment and Grand Teton National Park,

Jackson Hole Wildlife Foundation (JHWF) is a non-profit organization that has been working for 33 years to conserve Wyoming and Idaho wildlife and their habitat. Our mission is to advance wildlife conservation through science, collaboration, and a community of volunteers. We work closely with state, local, and federal agencies, including the Wyoming Game & Fish Department, Grand Teton National Park, Bridger-Teton National Forest, and private landowners to preserve our native wildlife and their habitat, and to promote coexistence between people and wildlife.

We are pleased to have an opportunity to comment on this decision-making process about the cultural landscape of Moose-Wilson Road through the programmatic agreement between GTNP and the Wyoming Historic Preservation Officer. We are gravely concerned, however, that the federal government has skipped public process regarding the environmental impacts of this decision. Since the cultural significance of this area is innately tied to wildlife and habitat, we hope that the decisions made around the programmatic agreement reflect careful consideration of the complete set of resources that have shaped and been shaped by human presence.

In 2016, it was determined that constructing a pathway would have “significant and irreversible” impacts on the Indigenous archaeological site in the area, a 12-acre site with at least 11 partial stone circles or tipi rings, one of three large Native American base camps identified in the Jackson Hole area. There is no doubt that Indigenous people’s occupancy of the area was and is tied to the natural resources, especially the abundant wildlife. The historic character and cultural integrity of this landscape are inseparable from the ecological conditions that drew people here — and still do.

As the Park evaluates amendment of the 2016 Record of Decision (ROD) to incorporate elements of Alternative D from the prior extensive and expensive NEPA process, we note that the Park already considered and rejected this approach: the 2016 ROD found that Alternative D would provide more recreational amenities while causing greater harm to natural and cultural

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resources than the adopted Alternative C, primarily as a result of constructing a separate multi-use pathway.

Our concerns go beyond the physical record of Indigenous presence in this landscape and extend to the reasons Indigenous peoples have long depended on this place. Preserving the cultural significance of the area requires the preservation of the native ecosystem, including its wildlife. This cultural connection does not only exist in our past but is a major component of today's historic character and cultural integrity within Grand Teton National Park and will remain significant in the future only if the ecological conditions that created it, above all, its wildlife and habitat, are protected. To that end, we have further concern regarding the construction of a pathway on the Moose-Wilson Road, which will bring more pedestrians in the form of walkers, bicyclists and others to the corridor.

The impact of pedestrians on wildlife is outsized, even compared to that of slow-moving vehicles (the speed limit on Moose-Wilson Road is 25 and 35 mph). Wildlife change their behavior in the presence of pedestrians, leading to increased stress levels, daily and seasonal habitat use changes, and may simply drive them away from the area (Jordan et al. 2025). A controlled comparison of motorized and non-motorized recreation on the same landscape found that mid- to large-bodied mammals shifted their activity patterns and habitat use significantly more often in response to hikers on trails than to vehicles on roads (Gump & Thornton, 2023).

Our own community-science monitoring across the Bridger-Teton National Forest reached the same conclusion locally: foot traffic (hiking, skiing, and snowshoeing) had a stronger negative effect on wildlife than any other recreational activity, with elk showing both spatial and temporal avoidance of high-recreation areas and moose shifting the time of day they used heavily trafficked habitat (Larson et al., 2026). Because the proposed pathway is explicitly designed to accommodate walkers as well as cyclists, it would introduce substantial new foot traffic and touring bicycles, not merely the low-volume cycling through-traffic that currently exists, directly alongside the area's most sensitive foraging and calving habitat.

Grizzly bears in particular show immediate avoidance and flight responses to approaching people that are stronger and more consistent than their responses to passing vehicles (McLellan & Shackleton, 1989). This corridor provides incredibly important habitat to a multitude of important wild species. It is foraging habitat for black and grizzly bear in the fall, year-round habitat for moose, and parturition range for elk and moose. To emphasize the level of impact pedestrians have on wildlife, compared to vehicles, the added pavement and increased fragmentation of this project on the habitat is of secondary concern to the increased stress levels that pedestrians will cause for wildlife and their subsequent changes in habitat use.

It is also worth noting that the corridor's adopted 2016 alternative already includes sequenced, timed entry management of traffic, together with a reduced speed limit, specifically to protect the sensitive resources of the corridor. These lower-impact tools are working: by regulating vehicle volume and speed rather than adding a permanent structure, the Park has been able to reduce pressure on soils, vegetation, and wetlands while limiting disturbance to wildlife, including grizzly bears and other species

of concern — without foreclosing future management flexibility. A pedestrian pathway would lock in a permanent footprint of disturbance that cannot be scaled back or adjusted in response to changing wildlife conditions the way timed entry and speed management can.

Finally, adding a pathway to the Moose-Wilson Corridor will vastly increase the incidence of human-wildlife conflict that cannot be mitigated with seasonal closures. Bears are present along this corridor in late summer and fall, gathering important caloric resources during hyperphagy that they cannot obtain elsewhere. Moose are here year-round, birthing and guarding their calves, mating during the rut, and foraging on important aquatic and other food sources. Elk too create a threat to pathway users that can result in human injury or death.

There is a reason that the National Park Service has a rule that people must stay >100 yards from bear and wolves and >25 yards from all other wildlife (unless people are in their cars). A pathway on the Moose-Wilson Road will put people in proximity to wildlife in breach of the rule almost daily, leading to many violations of this federal regulation.

As the programmatic agreement continues through evaluation, we ask that the full breadth of the cultural significance of the Moose-Wilson corridor is considered, including the wildlife resources that have been critical historically and now. The preservation of the historic and wild character of this area is critical to both the local, regional, and country's economy as wildlife are one of the main draws for visitors to Grand Teton National Park.

References

National Park Service, Grand Teton National Park. (2016). Moose-Wilson Corridor Comprehensive Management Plan, Record of Decision.

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Gump, K. M., & Thornton, D. H. (2023). Trucks versus treks: The relative influence of motorized versus nonmotorized recreation on a mammal community. *Ecological Applications*, 33(7), e2916.

McLellan, B. N., & Shackleton, D. M. (1989). Immediate reactions of grizzly bears to human activities. *Wildlife Society Bulletin*, 17(3), 269–274.

Sincerely,



Renee Seidler

Executive Director

Jackson Hole Wildlife Foundation