

**UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE**

RECORD OF DECISION AMENDMENT

MOOSE-WILSON CORRIDOR COMPREHENSIVE MANAGEMENT PLAN

**Grand Teton National Park
Wyoming**

INTRODUCTION

The Moose-Wilson corridor encompasses about 10,300 acres in the southwest corner of Grand Teton National Park (park). The corridor is bounded roughly by the Teton Range to the west, the Snake River to the east, Teton Park Road to the north, and the park's south boundary. The Moose-Wilson Road extends for 7.1 miles through the corridor and serves as the primary access route to several key destinations in the area. The narrow, winding road provides access to the south end of the park and a rustic, slow-driving experience for visitors looking for exceptional scenery and wildlife viewing opportunities.

In 2016, the National Park Service (NPS) completed the 2016 Moose-Wilson Corridor Final Comprehensive Management Plan / EIS (2016 FEIS) and signed a Record of Decision (ROD) selecting alternative C. The overarching purpose of the 2016 FEIS was to establish a long-term vision and provide comprehensive management strategies for the Moose-Wilson corridor to ensure the protection of significant national park resources and values. The NPS is revisiting the 2016 FEIS and issuing a ROD amendment to better align with implementation of the July 3, 2025 Executive Order 14314, Making America Beautiful Again by Improving Our National Parks, which calls for improving visitor services, enhancing access, and reviewing policies that may unnecessarily restrict recreation in national parks.

DECISION (SELECTED ACTION)

Grand Teton National Park continues to implement alternative C as described in the 2016 FEIS and selected in the 2016 ROD. While implementation of some actions in alternative C are ongoing, the park is amending the selected action to incorporate elements of alternative D. Specifically, the park is incorporating a separated multiuse pathway extending the length of the Moose-Wilson Corridor and realignment of a segment of the Moose-Wilson Road, with a parallel pathway, between Sawmill Ponds and Death Canyon Road, previously analyzed in alternative D with minor refinements to the pathway and road alignments to further mitigate adverse impacts. These changes are described in more detail below. See also Attachment A, Maps, below.

In accordance with NPS policy, a non-impairment determination for the selected action is attached to this Record of Decision Amendment (attachment B).

Revised Selected Action, incorporating minor refinements to the Moose-Wilson Road, and a multiuse pathway (alternative D):

In the 2016 FEIS, the alternatives presented strategies by 10 management topics: Traffic Management along Moose-Wilson Road; Physical Characteristics of Moose-Wilson Road; Moose-Wilson Road Realignments; Turnouts and

Parking; Bicycle Use; Commercial Activity; Death Canyon; Winter Access and Use; Visitor Use and Experience/Education and Interpretation; Horse Use. While the selected alternative (alternative C) will continue to be implemented, the amendment will replace or add strategies from alternative D within three of the 10 management topics: Moose-Wilson Road Realignments, Bicycle Use, and Commercial Activity.

Moose-Wilson Road Realignments

The amendment will replace the strategy to reconstruct the 1.8-mile road segment between Sawmill Ponds Overlook and the Death Canyon Road junction in its existing alignment with the following strategy: About 1.3 miles¹ of the segment between Sawmill Ponds Overlook and Death Canyon Road Junction will be removed and new roadway realigned to the east of the beaver ponds. The removed roadway will allow restoration of wetland functions, habitat connectivity, wildlife forage and protection while foraging. Specifically, it will provide additional forage and habitat for black and grizzly bears which use the choke cherry, hawthorn, and other native shrubs, trees, and vegetation along the west side of the wetland. Such realignment will improve protection as bears that use the existing habitat are more vulnerable to vehicle disturbance and possibly vehicle collisions. The new realignment, east of the beaver ponds, will extend for 1.9 miles. The old roadway will be removed and restored to natural conditions. See Appendix A, Maps.

The revised alignment is consistent with the general alignment shown in the 2016 FEIS alternative D map. The alignment depicted in the FEIS will be slightly modified at the south end to follow Moose-Wilson Road north from the Death Canyon Road junction to an existing unimproved road used to access private and former inholdings. See Appendix A, Map. The alignment will follow this unimproved road northeast to reconnect with the original alignment east of the beaver ponds. The alignment at the north end of the new alignment will shift slightly west.

Multiuse Pathway

The selected action will add the strategy to construct a multiuse pathway parallel to Moose-Wilson Road between Moose and the Granite Canyon Entrance. The pathway will use pathway design consistent with pathways elsewhere in Grand Teton National Park, including serpentine alignment to manage speeds. The pathway will generally be as close to the roadway as possible and within 150 feet of the edge of the Moose-Wilson Road except near the Laurance S. Rockefeller Preserve (LSRP) or where vegetation and/or topography require otherwise. The alignment is consistent with the general alignment shown in the 2016 FEIS alternative D map. *This Record of Decision amendment does not constitute a final agency action with respect to bicycle use until compliance with the NPS servicerwide bicycle rule has been completed.*

The alignment depicted in the 2016 FEIS will be minimally modified to follow the perimeter of the LSRP visitor center parking lot and share the existing entrance road to the LSRP visitor center. This minor modification concentrates development rather than skirting the LSRP boundary as depicted in alternative D. Other minor alignment adjustments will bring the pathway closer to the intersection between the Moose-Wilson Road and Levee Access Road near the south end of the LSRP and swing away from the Moose-Wilson Road between the Granite Canyon Trailhead and Levee Access Road in one location to avoid a terrain obstacle. The road realignment modifications discussed above will also modify the pathway alignment because the pathway will follow the new road alignment as closely as possible except where otherwise described.

The selected action will also add the following strategies from alternative D to the Bike Use management topic:

¹The 2016 FEIS, alternative D states: "The 1-mile segment between Sawmill Ponds Overlook and Death Canyon Road junction would be realigned to the east of the beaver ponds to restore wetland functions and habitat connectivity." Based on the alignment depicted on the Alternative D map, the mileage is not accurate as stated in the 2016 FEIS. The realigned segment depicted in alternative D is closer to 1.8 miles. The amended selected alternative would realign about 1.3 miles of this segment.

- During the winter, bicycles will only be permitted to use the pathway when it is naturally clear of snow and ice, unless otherwise temporarily closed for resource protection.
- The multiuse pathway will be closed from sunset to sunrise (or provide specific hours) daily and during wildlife-related temporary closures.
- No special events will be permitted on the pathway.

Commercial Activity

The selected action will also add the following strategy from alternative D to the Commercial Activity management topic:

- Guided bicycle tours on the new pathway may be considered.

Relevant actions selected for implementation in 2016 Record of Decision

In addition, the following elements selected in alternative C have been implemented, or are in the process of being implemented. This is not considered new information because these actions were selected for implementation in the original Record of Decision:

Elements of the 2016 selected action previously implemented are:

- paved the 1-mile segment of gravel road on the south end of the corridor (actual length was 1.4 mile),
- constructed a new Granite Canyon trailhead and parking area,
- constructed a second entrance kiosk and safe turn around at the Granite Entrance Station,
- constructed a safe transition from the multiuse pathway at the south boundary of the park onto the Moose-Wilson Road.

Elements of the 2016 selected action planned for implementation (note: construction began Spring 2026):

- reconstruction of the road between the LSRP and Death Canyon Road,
- construction of the Death Canyon parking area and trailhead,
- realigning the road between Teton Park Road and the base of the hill just north of Sawmill and rehabilitation of the existing alignment.

DESIGN FEATURES AND MITIGATION MEASURES

A number of mitigation measures were identified in the 2016 FEIS (see pages 109-121) as well as best management practices (see pages 103-109 and 121-127). These measures will continue to apply as described in the 2016 Record of Decision.

Human-Wildlife Management Measures:

The following summary of human-wildlife management measures will be followed, clarified to include the multiuse trail. Every observation of an undesirable human-wildlife encounter would trigger an appropriate level of management response. Depending on the type and severity of the encounter, management actions may focus more on managing the people or the wildlife. For more information, see p. 96 of the 2016 FEIS, Number and Type of Human-Wildlife Encounters.

- Actions Directed Toward Humans:
 - Increased education
 - Safe and appropriate wildlife viewing practices.

- Understanding how human behavior can impact wildlife.
 - Preventing wildlife habituation and food conditioning.
 - Increased enforcement
 - Increase patrols when patterns of interaction suggest a significant increase in violation of regulations or potential conflicts relating to wildlife.
 - Enforce fines for improper food storage/garbage disposal.
 - Temporary signage and or barriers
 - Use as necessary to modify visitor use patterns in ways that mitigate human-wildlife interaction potential.
- Actions Directed Toward Wildlife:
 - Temporary closures
 - Close segments of Moose-Wilson Road and/or multiuse pathway during periods of concentrated bear foraging along road or trail sides.
 - Close segments of Moose-Wilson Road and/or multiuse pathway when inadequate staff exists to manage periods of concentrated bear use or wildlife traffic jams safely.
 - Close sensitive wildlife areas when necessary, such as nest sites, den sites, or feeding concentration areas.
 - Wildlife hazing, relocations, or removals
 - Considered as a last resort and usually when overly aggressive or food conditioned wildlife are present and when wildlife represent a clear human safety concern.

Endangered Species Act, Section 7 Reasonable and Prudent Measures:

To avoid and minimize adverse effects to grizzly bears and to address incidental take, the park will implement as part of the selected action the Reasonable and Prudent Measures, including Conservation Measures, and Terms and Conditions as described in the Biological Opinion (attachment C) received pursuant to formal consultation on this project with the U.S. Fish and Wildlife Service under the Endangered Species Act. The park may also consider Conservation Recommendations to further minimize or avoid adverse effects.

National Historic Preservation Act, Section 106 Programmatic Agreement:

Because archeological surveys are not yet fully complete, the NHPA Section 106 Programmatic Agreement establishes a phased identification approach to ensure that as additional resources are identified, the NPS will take all practicable efforts to avoid, minimize, and mitigate adverse impacts. All stipulations developed and agreed to in the Programmatic Agreement (attachment C) will be followed. Subsequent consultation with the SHPO and consulting parties will be completed, as appropriate.

Wetlands Statement of Findings Avoidance and Minimization Measures:

The NPS followed the sequence of avoiding, minimizing, and compensating for wetland impacts. Impacts on wetlands would be avoided in selected locations by realigning Moose Wilson Road and constructing the new multiuse pathway outside of wetlands to the greatest extent possible during project design. During the design process, when complete avoidance is not possible, soil and vegetation removal for cut/fill slopes and grading would be limited to the smallest area possible. Impacts on existing wetlands outside of the construction area would be avoided by restricting ground disturbance outside of construction limits. No construction materials would be stockpiled in wetland areas. Best Management Practices and Mitigation Measures are described in detail in the FEIS (pp. 103–121). In addition to the measures listed in the EIS, the NPS would adhere to the conditions of any Clean Water Act Section 404 and Section 401 Permits to minimize potential impacts on streams and wetlands.

SUMMARY OF EXISTING NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) ANALYSIS VALIDITY

On February 24, 2026, the Department of Interior (DOI) published its final NEPA Implementing Regulations (regulations; 91 Fed. Reg. 8738) and updated its NEPA procedures at 516 Department Manual (DM) 1: DOI Handbook of NEPA Implementing Procedures (Handbook). The 2016 FEIS and associated Record of Decision (ROD) was prepared following the then-current NEPA procedures that predated the current regulations and Handbook. While this ROD amendment incorporates by reference analysis in the 2016 FEIS, it is consistent with 2026 regulations and Handbook.

The NPS has reviewed the 2016 Final Environmental Impact Statement for the Moose-Wilson Corridor in light of the proposed amendment to add the alternative D multiuse pathway to the alternative C management framework. Based on that review, the existing analysis remains valid, and there is no new information or circumstances that would substantially change the analysis or its conclusions. The reasonably foreseeable effects of the selected action are similar in nature, character, and trajectory to those analyzed in the existing NEPA document. The multiuse pathway and associated road improvements were fully analyzed under alternative D in the 2016 FEIS. The alternative D alignment with minor modifications does not substantially change the analysis but will incrementally reduce impacts to wildlife habitat, soils and vegetation, wetland functions, and archeological resources more than the alignment analyzed in alternative D of the FEIS. The primary new information identified since the 2016 FEIS is an increase in corridor visitation and the emergence of e-bikes. Across all resource topics, the 2016 FEIS assumed continued visitation growth as a baseline condition, and while higher current volume may modestly increase the magnitude of some effects, it does not introduce new categories of impact or alter fundamental conclusions for any resource.

RATIONALE FOR THE DECISION REACHED

The NPS is taking action to better align with implementation of the July 3, 2025, Executive Order (EO)14314, Making America Beautiful Again by Improving Our National Parks, which calls for improving visitor services, enhancing access, and reviewing policies that may unnecessarily restrict recreation in national parks. Specifically, the EO requires the Secretary of the Interior to review all Department rules and policies that govern public use and recreational access in national parks and rescind any rules that unnecessarily limit recreation. In accordance with EO 14314, NPS reevaluated actions not selected in the 2016 ROD that could improve recreational access, specifically, the multiuse pathway and the realignment of the road segment between Sawmill Ponds Overlook and the Death Canyon Road junction, as identified in alternative D of the 2016 FEIS. NPS has determined that adding these elements will improve recreational access, and the road realignment will also benefit natural resources. Although these elements depart somewhat from alternative C's original focus on development within the existing footprint, NPS believes these additions are warranted, and NPS will otherwise continue to implement alternative C as previously selected.

NPS is aware that the 2016 FEIS and ROD, under alternative D, identified potential significant increases in wildlife habitat disturbance and fragmentation, wildlife-related safety concerns for visitors, changes to the character and visual quality of the corridor, adverse impacts to vegetation, adverse impacts to the historic character and scenic quality of the Moose-Wilson corridor, and adverse impacts on a major archeological site and possibly other unidentified archeological sites. While some of these impacts are unavoidable – such as impacts to vegetation and the visual quality of the corridor from a multiuse trail, the ROD amendment includes mitigation measures and refinements to the road realignments meant to further reduce impacts to wildlife, wetlands, and archeological resources, and the multiuse trail will be developed as close to the road as possible to keep impacts within the existing development footprint. The road realignment also results in fewer impacts to resources from the road itself as compared to alternative C. Wildlife disturbance, fragmentation, and safety concerns for visitors have been addressed by specifically incorporating human-wildlife indicators and thresholds and associated management measures for the multi-use trail, and the Reasonable and Prudent Measures and Terms and Conditions required by the Biological Opinion. The road

realignment would also mitigate and avoid impacts to cultural resources; the refined alignment avoids the majority of known features within the archeological sites, reducing anticipated impacts compared to what was analyzed in the 2016 FEIS. Because archeological surveys are not yet fully complete, the NHPA Section 106 Programmatic Agreement establishes a phased identification approach to ensure that as additional resources are identified, the NPS will take all practicable efforts to avoid, minimize, and mitigate adverse impacts.

In addition, impairment of these resources would not occur, as described in Attachment B, Non-impairment Determination, below.

SUMMARY OF PUBLIC, TRIBAL, AND AGENCY CONSULTATION

The NPS reinitiated tribal consultation and Section 106 consultation under the National Historic Preservation Act on March 23, 2026. Tribal consultation meetings were subsequently held on May 8 and May 12, 2026, providing tribes traditionally associated with the park the opportunity to discuss potential effects to historic properties and cultural resources. Consulting parties meetings were held on May 18 and June 17, 2026, to review and discuss the development of a Programmatic Agreement to resolve adverse effects and outline a phased approach for identifying historic properties. A 15-day public comment period on the draft Programmatic Agreement was held from June 24 through July 9, 2026, allowing the public an opportunity to review and provide input. A final programmatic agreement was signed on August 12, 2026. Because archeological surveys are not yet fully complete, the NHPA Section 106 Programmatic Agreement establishes a phased identification approach to ensure that as additional resources are identified, the NPS will take all practicable efforts to avoid, minimize, and mitigate adverse impacts.

Consultation under Section 7 of the Endangered Species Act was also initiated through the preparation and submission of a Biological Assessment to the U.S. Fish and Wildlife Service on April 21, 2026. The U.S. Fish and Wildlife Service subsequently issued a Biological Opinion on July 20, 2026, documenting its determination of effect on federally listed threatened and endangered species and their designated critical habitat.

CONCLUSION

The selected action as described meets the purpose and need for the Moose-Wilson Corridor Comprehensive Management Plan and addresses the planning issues and opportunities identified in the FEIS.

As described in the "Design Features and Mitigation Measures" section above, all practical means to avoid or minimize environmental harm from the selected action have been adopted. The selected action will not result in the impairment of park resources and values (see attachment B).

On February 24, 2026, the Department of Interior (DOI) published its final NEPA Implementing Regulations (regulations; 91 Fed. Reg. 8738) and updated its NEPA procedures at 516 Department Manual (DM) 1: DOI Handbook of NEPA Implementing Procedures (Handbook). The 2016 FEIS and ROD were prepared following the then-current NEPA procedures that predated the current regulations and Handbook. While this ROD amendment incorporates by reference relevant portions of the 2016 FEIS (as described above in Decision (Selected Action)), this ROD amendment is consistent with 2026 regulations and Handbook.

The NPS has considered the factors mandated by NEPA. The 2016 Final Environmental Impact Statement represents the NPS's good-faith effort to fulfill NEPA's requirements by prioritizing documentation of the most important relevant considerations within the statutorily mandated page limits and timeline. This prioritization reflects the NPS's expert judgment; any considerations addressed briefly or left unaddressed are, in NPS's judgment, comparatively non-substantive and would not meaningfully inform NPS's consideration of environmental effects and the decision to be made. The NPS found that the Environmental Impact Statement is substantially complete, considers the factors

mandated by NEPA, and, in the decisionmaker's judgment, contains analysis adequate to inform NPS's decision regarding this action.

The official responsible for approving this Record of Decision is the Regional Director, Interior Region 6 (Arkansas-Rio Grande-Texas-Gulf); Region 7 (Upper Colorado Basin); Region 8 (Lower Colorado Basin), NPS.

The official responsible for implementing the selected action is the Superintendent of Grand Teton National Park, Wyoming.

RECOMMENDED:

Palmer "Chip" Jenkins, Superintendent

Date

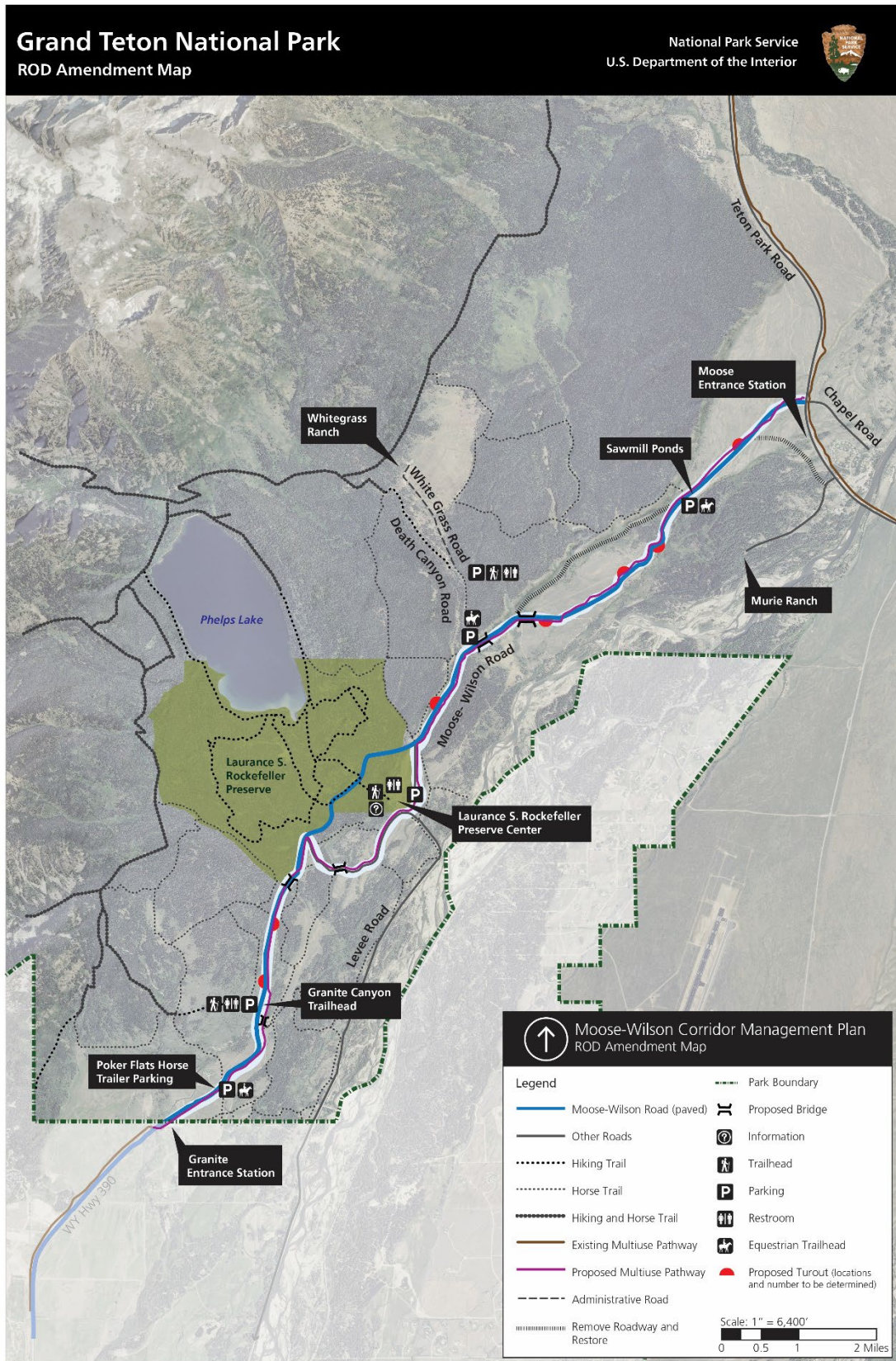
APPROVED:

Herbert C. Frost, Regional Director (acting)

Date

Attachment A: Map
Attachment B: Non-impairment Determination
Attachment C: Consultation Letters

ATTACHMENT A: MAP



ATTACHMENT B: NON-IMPAIRMENT DETERMINATION

By enacting the NPS Organic Act of 1916 (Organic Act), Congress directed the US Department of the Interior and the National Park Service (NPS) “to conserve the scenery, natural and historic objects, and wild life in the [National Park] System units and to provide for the enjoyment of the scenery, natural and historic objects, and wild life in such manner and by such means as will leave them unimpaired for the enjoyment of future generations” (54 USC 100101(a)). Congress reaffirmed this mandate in 1978 by stating that the NPS must conduct its actions in a manner that will ensure no “derogation of the values and purposes for which the System units have been established, except as directly and specifically provided by Congress” (54 USC 100101(b)(2)).

NPS Management Policies 2006, Section 1.4.4, explains the prohibition on impairment of park resources and values: While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the NPS. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them.

The NPS has discretion to allow impacts on park resources and values when necessary and appropriate to fulfill the purposes of a park; however, the NPS cannot allow an adverse impact that would constitute impairment of the affected resources and values (NPS Management Policies 2006, Section 1.4.3). An action constitutes an impairment when its impacts “harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values” (NPS Management Policies 2006, Section 1.4.5). To determine impairment, the NPS must evaluate “the particular resources and values that would be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts” (NPS Management Policies 2006, Section 1.4.5).

This non-impairment determination has been prepared for the selected action, which incorporates minor refinements (road realignments) to the Moose-Wilson Road, and construction and use of a multiuse pathway, as described in alternative D of the 2016 Moose-Wilson Corridor Final Comprehensive Management Plan / EIS (2016 FEIS), and this Record of Decision. While not part of this selected action, the continued implementation of alternative C has not caused, and is not expected to cause, unacceptable impacts or impairment of park resources. This conclusion is based in part on the best professional judgment of park subject matter experts who have monitored the plan’s implementation over the past 10 years. The integration of elements of alternative D into the selected action likewise will not result in impairment as described below. As described above, it will also improve visitor experience and safety, and not lead to unacceptable impacts.

The following resource impact topics were considered in this non-impairment determination: wildlife and wildlife habitat; federally listed species; wetlands; hydrology; water quality; vegetation; soils; visual resources; acoustic resources and soundscapes; archeological resources; historic structures, sites, and cultural landscapes; and ethnographic resources. A non-impairment determination was not made for visitor use and experience, traffic and transportation, socioeconomic environment, and park operations because these impact topics are not generally considered to be park resources or values according to the Organic Act and are not subject to the non-impairment standard of the act. Thus, these topics cannot be impaired in the same way that an action can impair park resources and values. Similarly, because wilderness is subject to its own requirements under the Wilderness Act, it is not subject to the impairment standard of the Organic Act and is not included here.

Wildlife and Wildlife Habitat

The most notable adverse effects will involve the realignment of the Moose-Wilson Road segment between Sawmill Ponds and Death Canyon Road, and the construction of a separated multiuse pathway extending the length of the corridor, which will follow the new road alignment through the realigned segment.

Within the realigned segment, removing and restoring the existing roadway while shifting the new road east of the beaver ponds will reconnect wetland and shrub habitat with montane forest habitat to the west, yielding a net reduction in linear-feature footprint in that area even with the parallel pathway. Elsewhere along the corridor, however, the multiuse pathway will introduce a new linear feature that would affect wildlife movement patterns and habitat connectivity. The pathway's narrow serpentine alignment, its concentration of development near the LSRP, the closure from sunset to sunrise, and closure during wildlife-related needs are designed to reduce these effects.

The selected action also could result in increases in vehicle, pedestrian, and bicycle use disturbances to crepuscular wildlife behavior in the mornings and evenings, with non-motorized users potentially extending the temporal range and duration of human presence in the corridor. Wildlife behavioral disturbances could increase if visitors stop at the designated road turnouts or along the multiuse pathway if they see wildlife (as opposed to driving through slowly). Construction activity also will result in temporary disturbances to wildlife behavior, with the pathway construction extending these temporary effects across a slightly broader geographic area.

As noted above, most of the adverse effects on wildlife due to the selected action will be limited primarily to the Moose-Wilson Road corridor and the immediate multiuse pathway corridor. As described in the 2016 FEIS, "the most notable adverse effects of alternative D would be the significant net increases (relative to existing levels of wildlife habitat disturbances and fragmentation in the corridor) in wildlife disturbances, habitat loss, and fragmentation in the corridor from introducing a second primary human use corridor through the length of the project area, the multiuse pathway." However, none of these adverse impacts will substantially alter the park's wildlife populations or habitat conditions. The revised selected action incorporates avoidance, minimization, and mitigation measures through design, operations, and management — including routing the pathway as close to the road as feasible to reduce fragmentation. Continued monitoring, assessment and mitigation measures (including measures specific to pathway mitigation) would prevent a barrier effect from developing.

The selected action will also have some beneficial impacts by reducing wildlife disturbance through human-wildlife management measures, visitor use management, and the realignment of the Moose-Wilson Road that reconnects wetland and shrub habitat with montane forest habitat to the west.

Because the adverse impacts of the selected action will not be wide-scale or severe, and because of the likely beneficial effects and the pathway use restrictions designed to protect wildlife (i.e. use only when the path is naturally clear of snow and ice, closure between sunset to sunrise and seasonal closures, not allowing special events, and other human-wildlife management measures identified above), the selected action will not result in impairment of wildlife and wildlife habitat.

Federally Listed Species

The Endangered Species Act (ESA) Section 7 formal consultation with the U.S. Fish and Wildlife Service (FWS) in 2016 only included the project as described in Alternative C and did not include the elements of the new proposed action; therefore the park recently reconsulted with FWS to evaluate the effects of those added elements. The park provided a Biological Assessment to the FWS determining that the Project "may affect but is not likely to adversely affect" the Canada lynx (*Lynx canadensis*), the North American wolverine (*Gulo gulo luscus*), the yellow billed cuckoo (*Coccyzus americanus*), and the whitebark pine (*Pinus albicaulis*). It also determined the Project is "not likely to jeopardize the continued existence" of the monarch butterfly (*Danaus plexippus*) or the Suckley's cuckoo bumble bee (*Bombus suckleyi*), and "will not destroy or adversely modify" designated Canada lynx critical habitat. FWS concurred with the

“may affect but not likely to adversely affect” determinations for the Canada lynx, the North American wolverine, the yellow-billed cuckoo, and the whitebark pine, and the determination that the Project “will not destroy or adversely modify” designated Canada lynx critical habitat. Yellow-billed cuckoo and whitebark pine were considered but dismissed in the 2016 FEIS and those conclusions are still valid. The effects to wolverines were analyzed under wildlife generally (see 2016 FEIS, pages 346-348 for general habitat removal / restoration assumptions, wildlife behavioral disturbance assumptions, and habitat connectivity disturbance and habitat fragmentation assumptions), however, there is low likelihood that wolverines would occur in affected areas. The monarch butterfly and Suckley’s cuckoo bumble bee were not addressed by the FWS because they are only proposed for listing, and the park found a lack of suitable breeding habitat in the park for the project to affect the monarch butterfly, and there are no records of the Suckley’s cuckoo bumble bee occurring in the project area.

The 2016 FEIS found that there could be adverse effects to the Canada lynx from the following: (1) injury or mortality resulting from vehicle strikes; (2) change in the quality of habitat and availability of food; (3) displacement of lynx families from den locations associated with construction-related disturbance; and (4) temporary displacement or barriers to movement of adult lynx in the road corridor and disruption of predator-prey relationships due to noise, vehicles, and related human activities. The park found in its Biological Assessment that the project may affect, but is not likely to adversely affect the Canada lynx. It noted that “no known lynx dens would be directly or indirectly affected by the actions proposed. There would be some loss of potential forested lynx habitat, including habitat possibly used as travel corridors. The behavior of individual Canada lynx could be altered due to the presence of people and the construction and use of the new developments. Lynx that may move through the area could be affected and change their behavior due to the construction and use of new developments (pathway, road realignment). The proposed actions would not impede or reduce the effectiveness of the habitat to allow for the movement of lynx through the area and will not act as a barrier or reduce movement. Any potential impact of construction would be short-term and limited to the 1-2 years of anticipated construction. There could be minimal long-term effects of lynx avoiding the area due to human use for the foreseeable future.”

The grizzly bear was fully analyzed in the 2016 FEIS. The 2016 FEIS found that there could be adverse effects from the following: (1) potential injury or death resulting from vehicle collisions; (2) change in the quality of habitat and availability of food; (3) displacement of individuals from habitat alteration/degradation/removal of habitat; and (4) change in the frequency of human/grizzly bear encounters that may require relocation or removal of problem bears. The selected action will result in the loss of grizzly bear habitat, including berry-producing shrubs along Moose-Wilson Road, with additional habitat loss anticipated beyond the approximately 1.1 acres identified under the original selected action due to the construction footprint of the separated multiuse pathway extending the length of the corridor, which will follow the new road alignment between the Sawmill Ponds Overlook and the Death Canyon Road. The selected action also will affect the behavior of bears, possibly including temporary localized displacement along the existing and realigned segments of Moose-Wilson Road and along the new pathway corridor, with the potential for extended temporal disturbance as non-motorized users may travel the corridor during early morning and evening hours when bears are most active. The road realignment will improve the ability of bears to use the riparian corridor for movement and foraging and thus have a long-term, beneficial effect on grizzly bears once construction is completed. The pathway’s narrow serpentine alignment, closure from sunset to sunrise, and temporary or seasonal wildlife-related closures are designed to reduce these behavioral effects. These actions provide more temporal space where bears can forage without people being present, and reduce potential disturbance of bears when they are present. Management measures associated with human-wildlife indicators and thresholds would also reduce undesirable human-bear interactions and disturbance of bears within the corridor. This is consistent with the Biological Opinion finding that there may be a low level of take, and that “[a]ctivities associated with Project construction and subsequent recreational use by park visitors could result in changes to the grizzly bear population, reproduction, and distribution in the action area over the following ten years. The level of mortality that could occur because of ongoing Project construction and subsequent recreational use, however, will not appreciably reduce the overall population,

reproduction, and distribution of grizzly bears in the GYE or across its listed range, nor will it preclude recovery of the species. Therefore, authorization of the Project will not jeopardize the continued existence of the grizzly bear.”

In summary, the selected action is “not likely to adversely affect” most listed species, or “destroy or adversely modify” designated Canada lynx critical habitat. Adverse effects to the grizzly bear, including low levels of take, will not appreciably reduce the overall population, reproduction, and distribution in the project area, and will not preclude recovery of the species, and will not cause jeopardy. In addition, there are specific human-wildlife management management measures identified in the plan that the park intends to implement, in addition to the Reasonable and Prudent Measures and Terms and Conditions required by the Biological Opinion. For these reasons, the selected action will not result in impairment of the park’s federally listed species.

Wetlands

Adverse effects of the selected action involve ground disturbances associated with the construction of the separated multiuse pathway extending the length of the Moose-Wilson corridor and the realignment of the Moose-Wilson Road segment between Sawmill Ponds and Death Canyon Road, with the pathway following the new road alignment through the realigned segment. Pathway construction in proximity to wetland areas could result in vegetation trampling, temporary disturbance of wetland habitat, sedimentation, and potential introduction or spread of nonnative plants during construction and ongoing use. The project would permanently impact 2.095 acres of vegetated wetlands from placement of fill for the Moose-Wilson Road realignment and from construction of a new multiuse pathway. Permanent impacts on 0.077 acre of streambed (unvegetated wetlands) would also result from the project. The total acreage of permanent wetland impacts would be offset through compensatory mitigation by restoring wetlands through removal of an existing section of Moose-Wilson Road, up to 3.36 acres of mitigation credit, as described in the Wetland Compensation Plan (see Attachment C).

The realignment of the road segment between Sawmill Ponds and Death Canyon Road will shift high levels of vehicle traffic away from the large, sensitive wetland complex east of the existing road, substantially reducing chronic adverse effects of vegetation trampling, degraded wetland plant communities, and disturbed wetland habitat that would otherwise continue along the existing alignment. Removal and restoration of the existing roadway through this segment will further benefit wetland conditions by restoring natural hydrology and habitat where the pavement is removed. In addition, Moose-Wilson Road would no longer fragment the wetland habitat connectivity from the forested and montane habitat to the west. However, the pathway in this segment will introduce non-motorized user presence in proximity to wetlands areas, which could result in localized vegetation trampling and disturbance where pathway users leave designated surfaces.

Other adverse effects from the selected action will result from ground disturbances associated with various construction projects, as well as the continuation of current winter use impacts (e.g., snow storage in the plowed sections of Moose-Wilson Road will continue to be a source for sediment loading into adjacent wetlands). Because bicycles will only be permitted on the pathway when it is naturally clear of snow and ice, no winter maintenance of the pathway is anticipated, avoiding additional sources of sediment or deicing material loading into adjacent wetlands. In addition, the drainage improvements between Death Canyon Road and Sawmill Ponds Overlook could result in some short- and long-term sedimentation to downstream wetlands if hillside excavation is needed to accommodate the improvements; however, most of these adverse impacts will be relatively localized to this segment of the Moose-Wilson Road.

Overall, the selected action will provide beneficial effects to wetlands by relocating the road segment between Sawmill Ponds and Death Canyon Road away from the large wetland complex, thereby reducing chronic vehicle-related disturbance, sediment loading, and habitat fragmentation along this sensitive area. The selected action will also improve hydrological connectivity between upstream drainages and the large wetland complex due to

realignment of the Moose-Wilson Road and restoration of the former roadbed in the same area. The total acreage of permanent wetland impacts would be offset through compensatory mitigation by restoring wetlands through removal of an existing section of Moose-Wilson Road. In summary, the selected action will result in both beneficial and adverse impacts on wetlands, but the adverse impacts will be neither widespread or severe, and the beneficial effects are expected to result in an appreciable improvement to wetland conditions. For these reasons, the selected action will not result in impairment of the park's wetlands.

Hydrology

The selected action will have limited effects on the park's hydrology, and any adverse impacts will be localized within the corridor. Adverse impacts will occur primarily due to increased impervious surfaces from paving realigned road surfaces and construction of the multiuse pathway, alterations to natural flow patterns in previously undisturbed areas where the pathway is developed and the road realigned, including the area surround the realignment of the Moose-Wilson Road between Sawmill Ponds Overlook and Death Canyon Road. The pathway's narrow footprint and serpentine alignment limit the extent of new impervious surface. Short-term adverse impacts to hydrology at these sites will also occur from construction activities. On the other hand, the selected action will have several long-term beneficial effects, most notably the restoration of some hydrological connectivity and wetland hydrology due to the realignment of the Moose-Wilson Road between Sawmill Ponds Overlook and Death Canyon Road, removal and restoration of the former roadbed, and improved drainage structures incorporated into the new alignment. For these reasons, the selected action will not result in impairment of the park's hydrology.

Water Quality

The selected action will result in some adverse impacts on water quality due to continued vehicle-related pollution (i.e., petroleum-based) migration within the corridor, vehicle pollutants introduced into previously undisturbed areas due to the road realignment between Sawmill Ponds Overlook and Death Canyon Road and sediment loading from newly disturbed areas and construction activities associated with the road realignment and multiuse pathway construction. Stormwater runoff from the new pathway may also contribute localized sediment loading during construction and to a lesser extent, during ongoing use. These impacts will be localized within the corridor, and water quality in most of the corridor will not be affected by the selected action. Removal and restoration of the existing roadbed through the realigned segment will reduce a long-standing source of vehicle-related pollutant loading immediately adjacent to the large wetland complex and associated surface waters, and construction-related activities are short-term in nature. Because of the limited, localized adverse impacts on water quality and the long-term beneficial effects reducing water quality impacts in wetlands, the selected action will not impair water quality in the park.

Vegetation

The selected action will result in some loss of vegetation due to construction of the new road alignment between Sawmill Ponds Overlook and Death Canyon Road and the multiuse pathway extending the length of the Moose-Wilson Corridor, approximately 23 acres in all. Short-term disturbance to vegetation will also occur due to construction activities associated with these developments. In addition, there will be an increase in the potential for the spread of nonnative plant species due to new ground disturbance, with the pathway extending this potential across a broader geographic area than the original selected action. All of these adverse impacts will occur in a relatively small area of the corridor, and, relative to the project area, a small area of approximately 23 acres of native vegetation will be permanently lost or altered and the vegetation that will be lost (primarily lodgepole pine forest and shrubland) is common in the project area.

The pathway's narrow serpentine alignment, its concentration of development along the perimeter of the LSRP parking lot rather than skirting the LSRP boundary, and the routing of the realigned road and parallel pathway east of the beaver

ponds are designed to minimize vegetation loss and avoid sensitive plant communities. The selected action will not result in a substantial alteration or loss of vegetation communities or a major change in the distribution and abundance of native plant species in the project area.

In addition, the selected action will have a beneficial effect on native vegetation due to removal and revegetation of the existing road segment between Sawmill Ponds Overlook and Death Canyon Road. Because the selected action will result in mostly localized adverse impacts that are relatively slight in nature, and because of its long-term beneficial effects, there will be no impairment of the park's vegetation.

Soils

The selected action will result in the permanent loss or alteration of topsoil due to the development of a new road segment between Sawmill Pond Overlook and Death Canyon Road and construction of the multiuse pathway extending the length of the Moose-Wilson Corridor, approximately 23 acres in all. Some additional long-term topsoil erosion will occur due to surface runoff and ditch channelization, primarily due to the new road alignment and the pathway corridor. Additional short-term disturbance of soils will occur due to construction activities. Relative to the project area, a small area of topsoil will be permanently lost or altered, with the pathway extending this disturbance across a broader geographic area than the original selected action while maintaining a narrower cross-section than roadway construction. Whenever possible, soils that are disturbed will be revegetated for a long-term reduction of soil erosion.

Moreover, the selected action will have beneficial effects, including the restoration of soil and a reduction in soil compaction, erosion, and alteration, due to the removal and restoration of the existing road segment between Sawmill Ponds Overlook and Death Canyon Road. Therefore, the selected action will not result in an impairment of the park's soils.

Visual Resources

Most of the visual resources in the corridor will not be affected by the selected action. Some localized adverse impacts on the visual resources of the Moose-Wilson Corridor will occur due to realigning the segment of Moose-Wilson Road between Sawmill Ponds Overlook and Death Canyon Road and construction of the multiuse pathway, the viewsheds in these areas will be slightly altered. The pathway will introduce a new linear feature visible from portions of the Moose-Wilson Road and from some trails and viewpoints within the corridor, though its narrow serpentine alignment and routing within existing vegetation are designed to limit its visual prominence.

The selected action will also produce localized beneficial visual effects through the removal and restoration of the existing roadway between Sawmill Ponds Overlook and Death Canyon Road, which will return a visually intrusive paved surface adjacent to the beaver ponds to natural conditions. For these reasons the selected action will not result in impairment of the park's visual resources.

Acoustic Resources and Soundscapes

The selected action will result in some short-term adverse effects to acoustic resources and soundscapes due to construction activities. The acoustic impacts associated with the pathway, including increased human-caused sounds such as voices and bicycle noise, the potential for reduced bear-to-human warning time in localized areas, and construction noise during the build period, were specifically identified and evaluated under alternative D of the 2016 FEIS. While e-bike speeds in the corridor have been found to be equivalent to those of conventional bicycles, e-bikes operate more quietly, which could modestly affect the acoustic dynamic identified in the 2016 FEIS, specifically, the finding that quiet, high-speed cyclists limit reaction time for both visitors and bears.

Accordingly, the acoustic effects of the pathway, including those associated with e-bike use, will not impair the soundscape values or wildlife interaction dynamics for which this area is managed. The impacts remain within the scope of effects evaluated in the 2016 and most of the acoustic resources and soundscapes in the corridor will not be affected by the selected action. Because the selected action will result in only slight adverse noise impacts in localized areas and will result in substantial improvements in acoustic resources and soundscapes in several areas of the corridor, the selected action will not result in impairment to the park's acoustic resources and soundscapes.

Historic Structures, Sites, and Cultural Landscapes

Under the selected action, the overall historic character of the Moose-Wilson Road and the White Grass / Death Canyon Roads and their associated cultural landscapes will largely be preserved, though with some modifications associated with the realignment of the Moose-Wilson Road between Sawmill Ponds Overlook and Death Canyon Road and the addition of a multiuse pathway extending the length of the corridor.

The realigned road segment will depart from the historic alignment of the Moose-Wilson Road in this area, with the new alignment shifting east of the beaver ponds. The existing roadway will be removed and restored to natural conditions. This represents an alteration to a character-defining feature of the Moose-Wilson Road cultural landscape. However, the realignment has been refined to minimize impacts on character-defining features, and the broader Moose-Wilson Road and White Grass / Death Canyon Road cultural landscapes outside this segment will retain their existing alignments and historic character.

The multiuse pathway introduces a new linear feature within the corridor that was not present during the period of significance. The pathway's narrow serpentine alignment, its general routing within 150 feet of the road edge, and its concentration along the perimeter of the LSRP parking lot are designed to limit its visual and spatial intrusion on the cultural landscape. Even with these design features, the pathway represents a new constructed element within the cultural landscape and will be evaluated as stipulated in the executed Programmatic Agreement (see Attachment C). Outside the realigned segment, the road will retain its designed scale and spatial arrangement as a narrow and mostly undeveloped rural road, with elements of the natural setting mostly unchanged from the period of significance. As stipulated in an executed Programmatic Agreement (see Attachment C), the NPS will continue consultation under Section 106 of the National Historic Preservation Act for the selected action, including consultation with the Wyoming State Historic Preservation Office, associated Tribes, and other consulting parties, and will incorporate any required avoidance, minimization, or mitigation measures into final design and construction such that adverse impacts are not expected to rise to a level that would substantially affect the integrity of the cultural landscape to a point that would cause impairment. Furthermore, the affected historic structures, sites, and cultural landscapes are not the only examples of this time period, and these resources will retain sufficient integrity to continue to convey their historic significance. Consequently, implementation of the selected action will not result in an impairment of the park's historic structures, sites, and cultural landscapes.

Archeological Resources

Under the selected action, the archeological resources, such as 48TE498 (described on page 239 in the 2016 FEIS), along the Moose-Wilson Road will be avoided to the extent possible. The segment of Moose-Wilson Road between Sawmill Ponds Overlook and the Death Canyon Road junction will be realigned to the east of the beaver ponds. The new alignment has been refined from the alignment analyzed in alternative D of the 2016 FEIS to further minimize impacts to archeological resources, including site 48TE498. The multiuse pathway will follow the new road alignment through this segment, and the existing roadway will be removed and restored to natural conditions. Potential adverse impacts on currently unidentified archeological resources could result from construction of the realigned road segment and possibly restoration of the previous road, construction of the multiuse pathway, natural erosion, visitor use, ongoing NPS maintenance operations, and other factors. However, the NPS will continue to systematically survey

lands within the Moose-Wilson Corridor as needed and will record newly identified sites to avoid, minimize, or mitigate potential impacts. As stipulated in an executed Programmatic Agreement (see Attachment C), the NPS will continue consultation under Section 106 of the National Historic Preservation Act for the selected action, including consultation with the Wyoming State Historic Preservation Office, associated Tribes, and other consulting parties, and will incorporate any required avoidance, minimization, or mitigation measures into final design and construction such that adverse impacts are not expected to rise to a level that would substantially affect the integrity of archeological resources to a point that would cause impairment. Furthermore, the affected archeological resources are not the only examples of this time period, and these resources will retain sufficient integrity to continue to convey their historic significance. Consequently, implementation of the selected action will not result in impairment of the park's archeological resources.

Ethnographic Resources

The archeological/ethnographic sites identified within the area of potential effect will be avoided under the selected action to the extent possible. The realignment of the Moose-Wilson Road segment between Sawmill Ponds Overlook and Death Canyon Road and the construction of the multiuse pathway extending the length of the corridor adjusts the area of potential effect and may require additional survey and consultation to identify and address potential ethnographic resources within the project footprint. As necessary, NPS staff will continue to consult with associated tribes as project designs reach more detailed development stages to ensure significant ethnographic sites and resources are avoided by project actions or are appropriately mitigated. As stipulated in an executed Programmatic Agreement (see Attachment C), the NPS will continue consultation under Section 106 of the National Historic Preservation Act for the selected action, including consultation with the Wyoming State Historic Preservation Office, associated Tribes, and other consulting parties, and will incorporate any required avoidance, minimization, or mitigation measures into final design and construction such that adverse impacts are not expected to rise to a level that would substantially affect the integrity of ethnographic resources to a point that would cause impairment. Furthermore, the affected ethnographic resources are not the only examples of this time period, and these resources will retain sufficient integrity to continue to convey their historic significance. NPS staff will ensure that those with traditional ties to the park continue to have access to places and resources of cultural and religious significance. Consequently, implementation of the selected action will not result in impairment of the park's ethnographic resources.

Resources Considered but Dismissed

As was documented in the 2016 FEIS (see Chapter 1), the selected action was found to have no or minimal impacts to resources dismissed from analysis. Those dismissed resources subject to the non-impairment standard are not addressed here, but remain available to be enjoyed by current and future generations.

Conclusion

As described above, adverse impacts on the park's natural, cultural, visual, and acoustic resources anticipated as a result of implementing the selected action will not rise to a level that would constitute impairment. Additionally, consistent with NPS Management Policies Section 1.4.7.1, the NPS considered the potential for unacceptable impacts and determined that none will occur.

ATTACHMENT C: CONSULTATION LETTERS

