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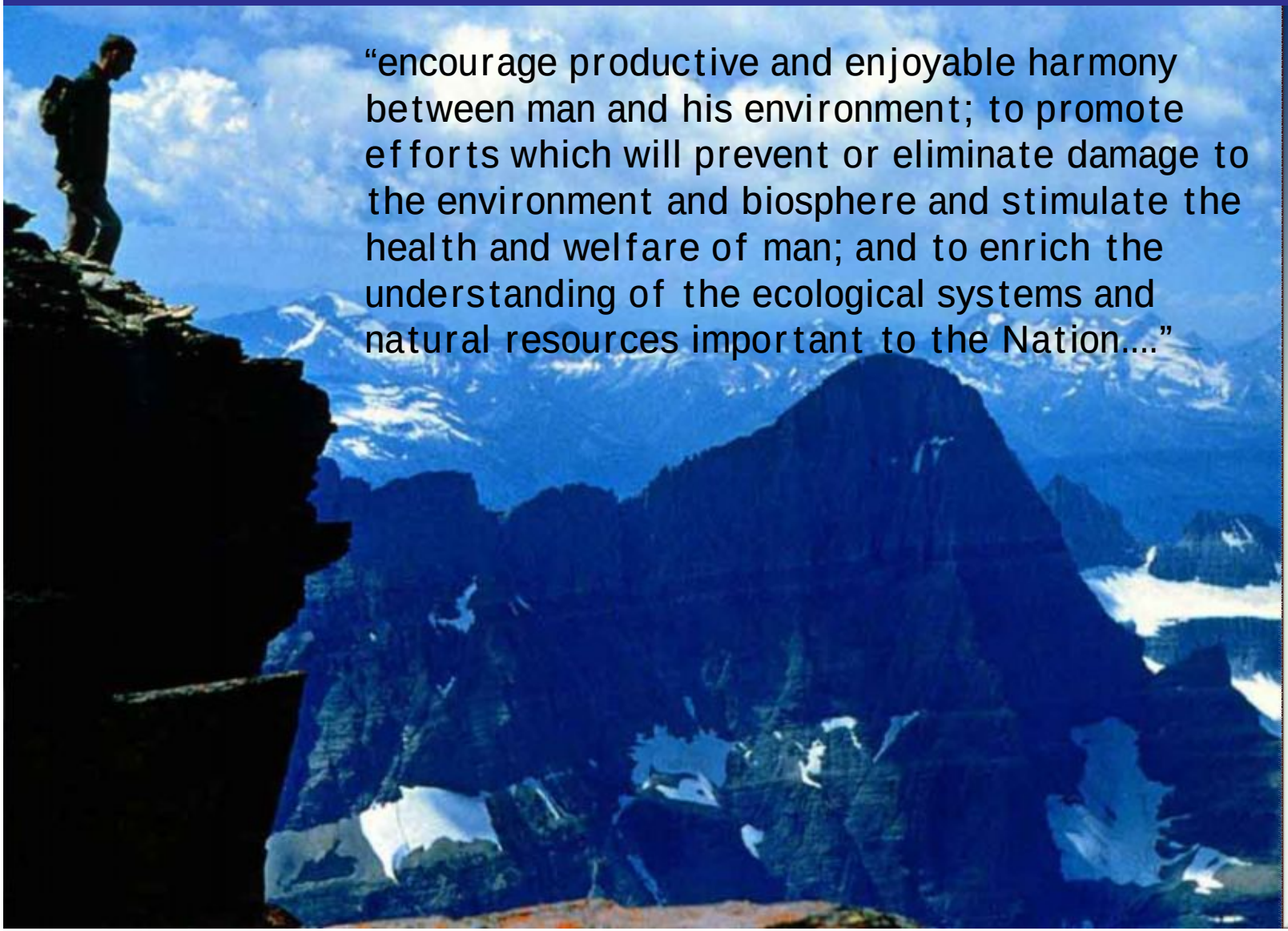

"encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; and to enrich the understanding of the ecological systems and natural resources important to the Nation…."

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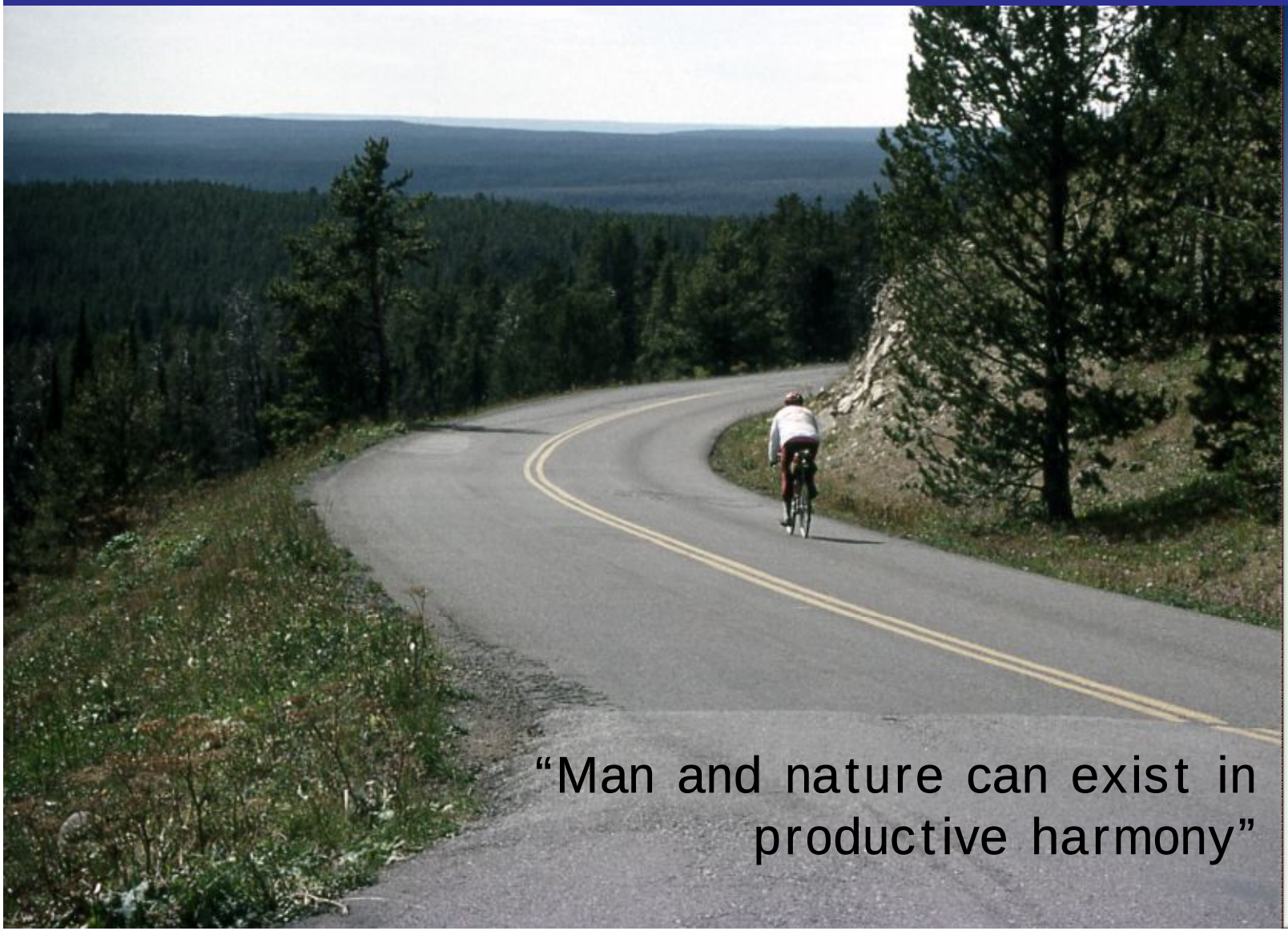

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Incorporate environmental considerations
Systematic interdisciplinary approach

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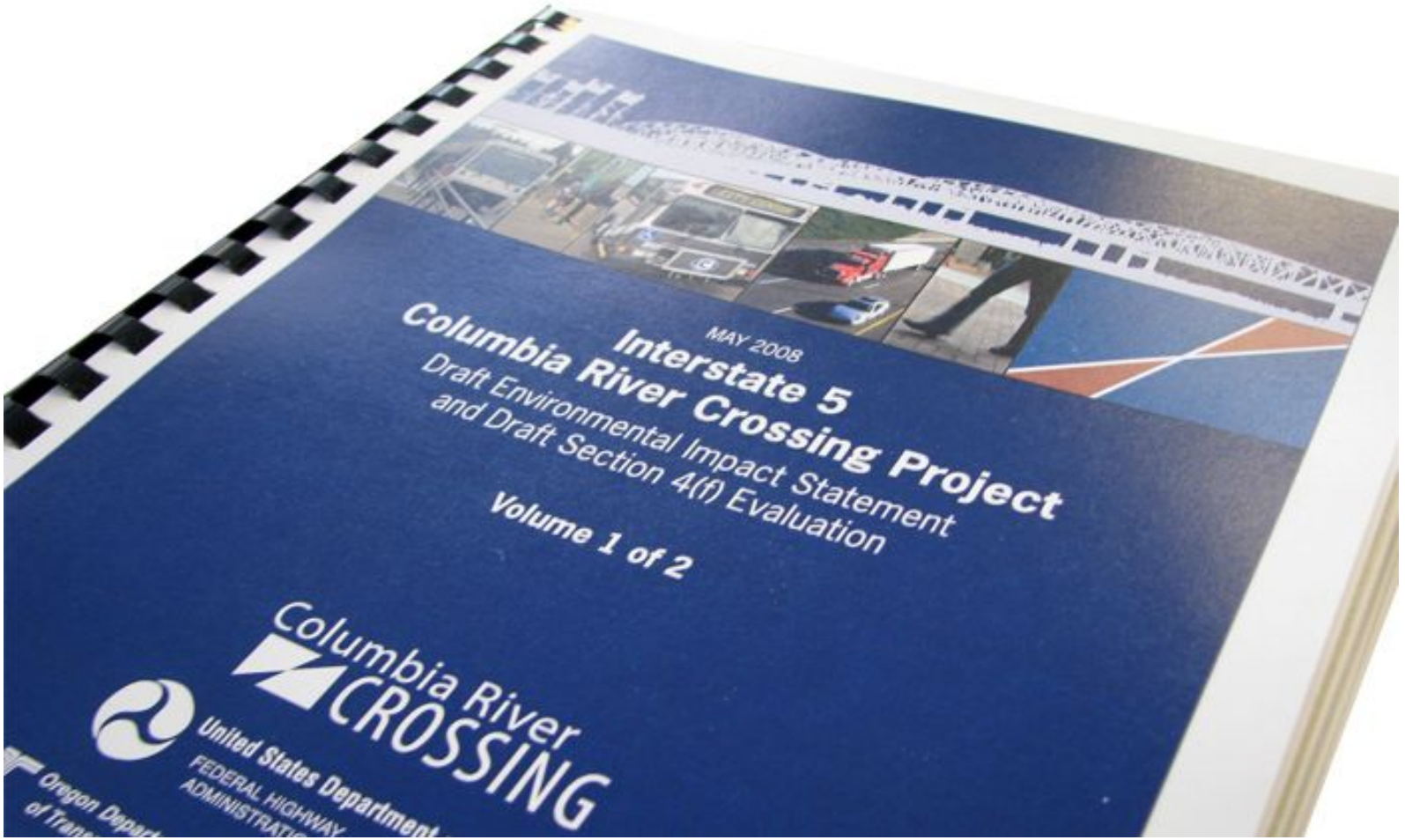

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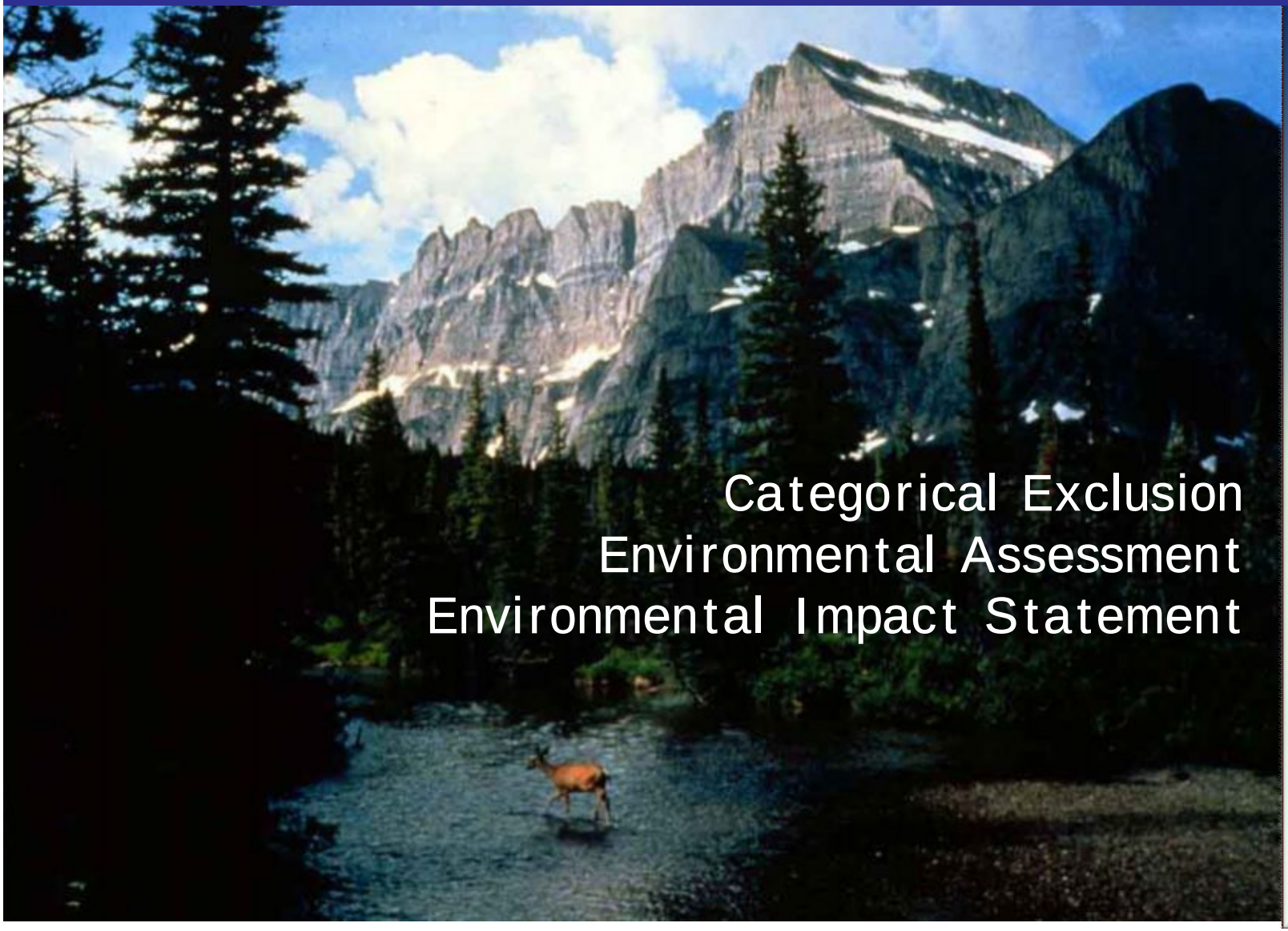

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Moose Headquarters Rehabilitation - Site Work
Environmental Assessment

January 2010

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DEPARTMENT OF JUSTICE ACTION: Public comment on Draft Environmental Impact Statement. --------- SUMMARY: The U.S. Department of Justice, Federal Bureau of Prisons (Bureau) announces the availability of the Draft Environmental Impact Statement (DEIS) for the proposed contract to secure additional inmate bed space for the Bureau's growing inmate population.

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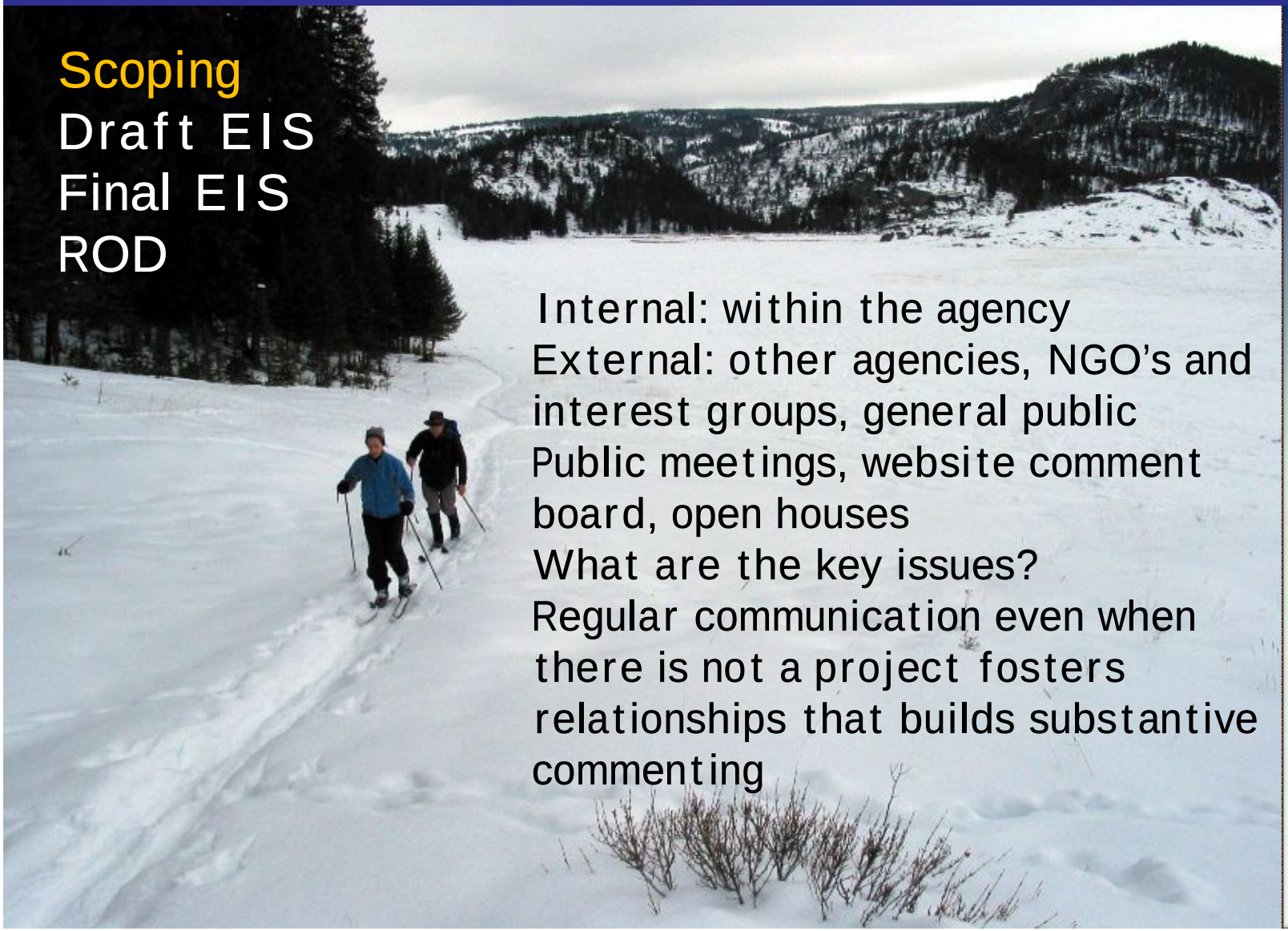

Scoping
Draft EIS
Final EIS
ROD

Internal: within the agency
External: other agencies, NGO's and interest groups, general public
Public meetings, website comment board, open houses
What are the key issues?
Regular communication even when there is not a project fosters relationships that builds substantive commenting

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Scoping
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Final EIS
ROD

Full description of the affected environment
Full reasonable range of alternatives
Analysis of the impacts of each alternative
A second opportunity to provide comments

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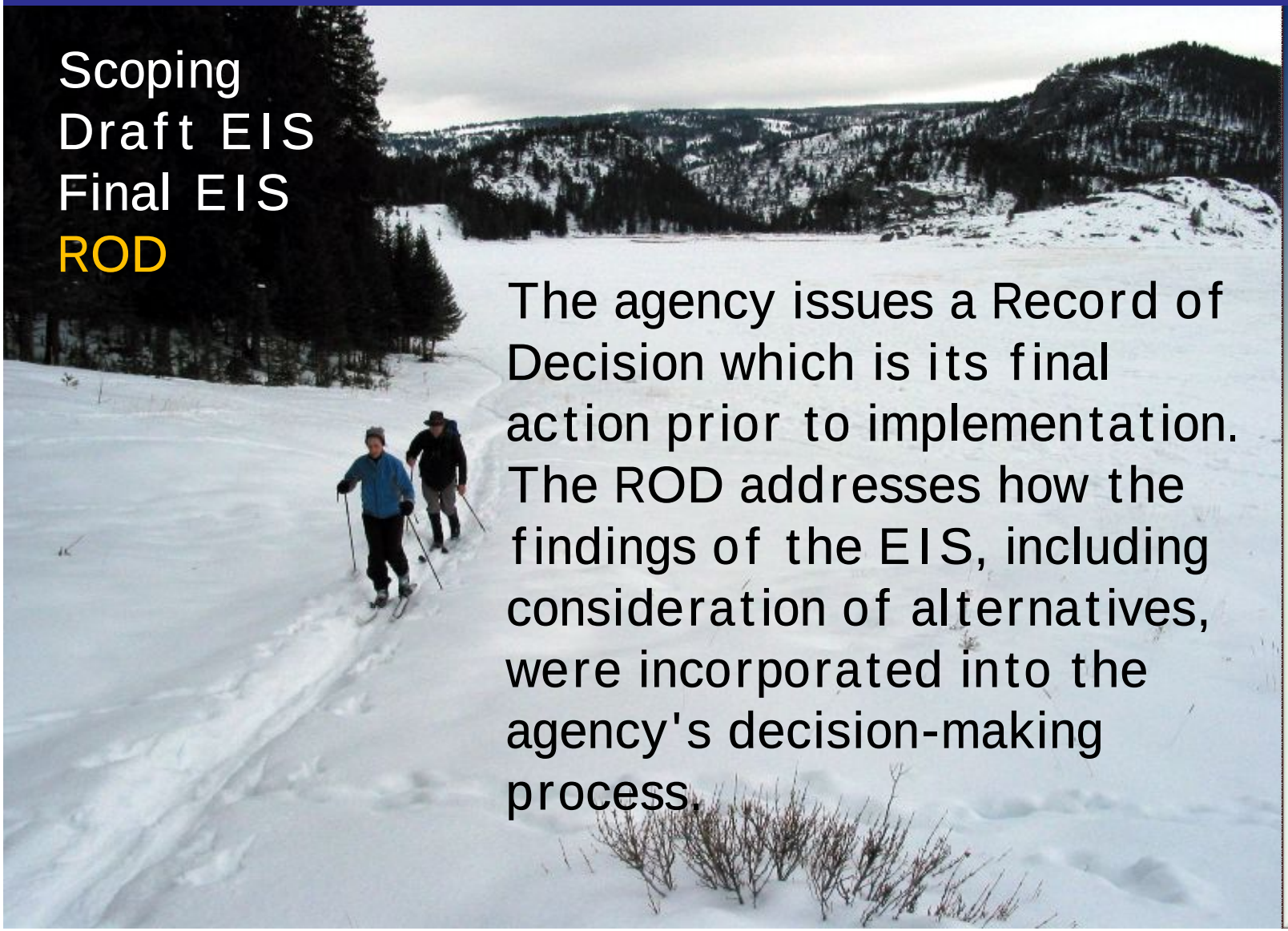

Scoping
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Final EIS
ROD

The agency issues a Record of Decision which is its final action prior to implementation. The ROD addresses how the findings of the EIS, including consideration of alternatives, were incorporated into the agency's decision-making process.

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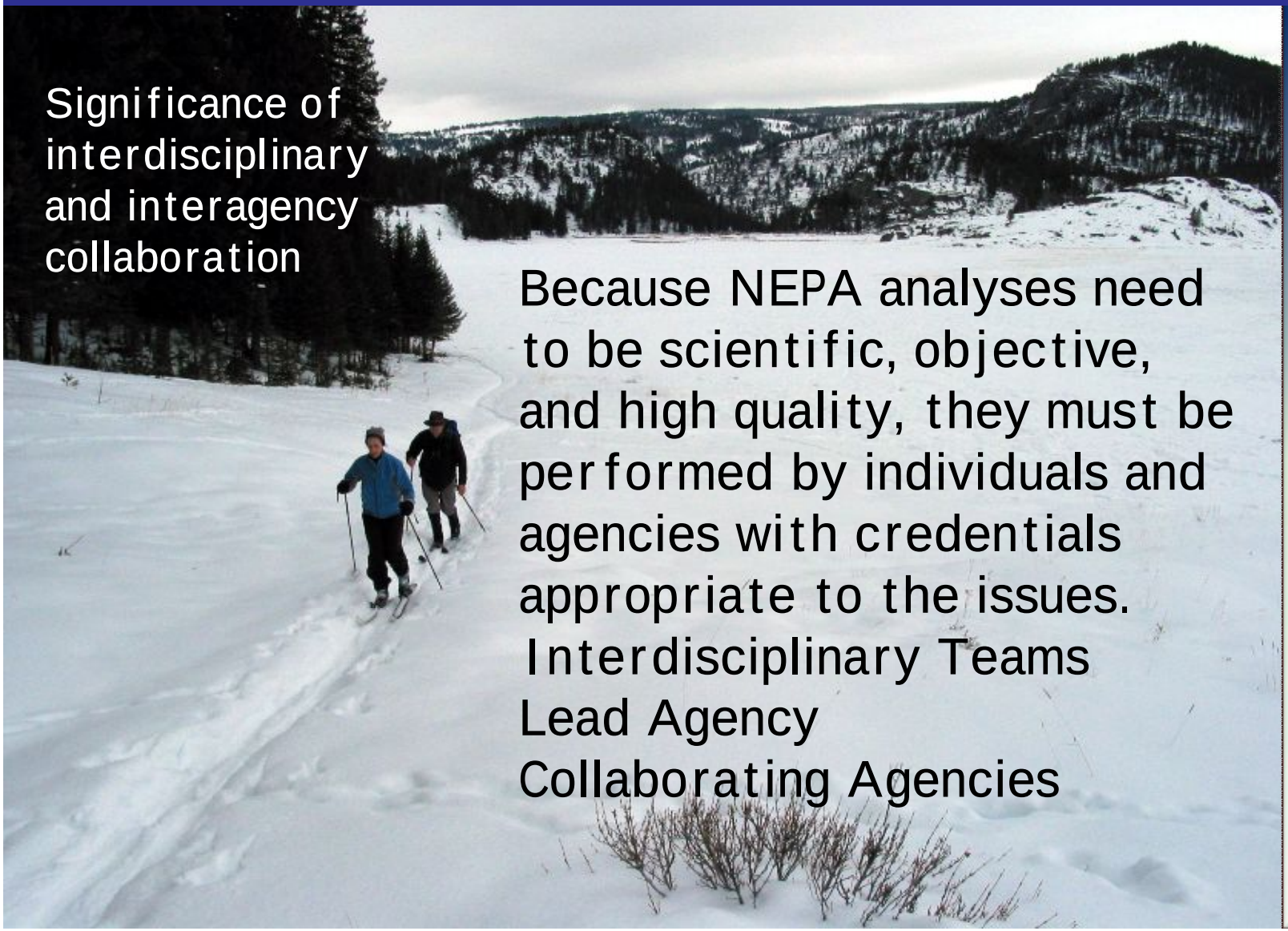

Significance of interdisciplinary and interagency collaboration

Because NEPA analyses need to be scientific, objective, and high quality, they must be performed by individuals and agencies with credentials appropriate to the issues.

Interdisciplinary Teams

Lead Agency

Collaborating Agencies

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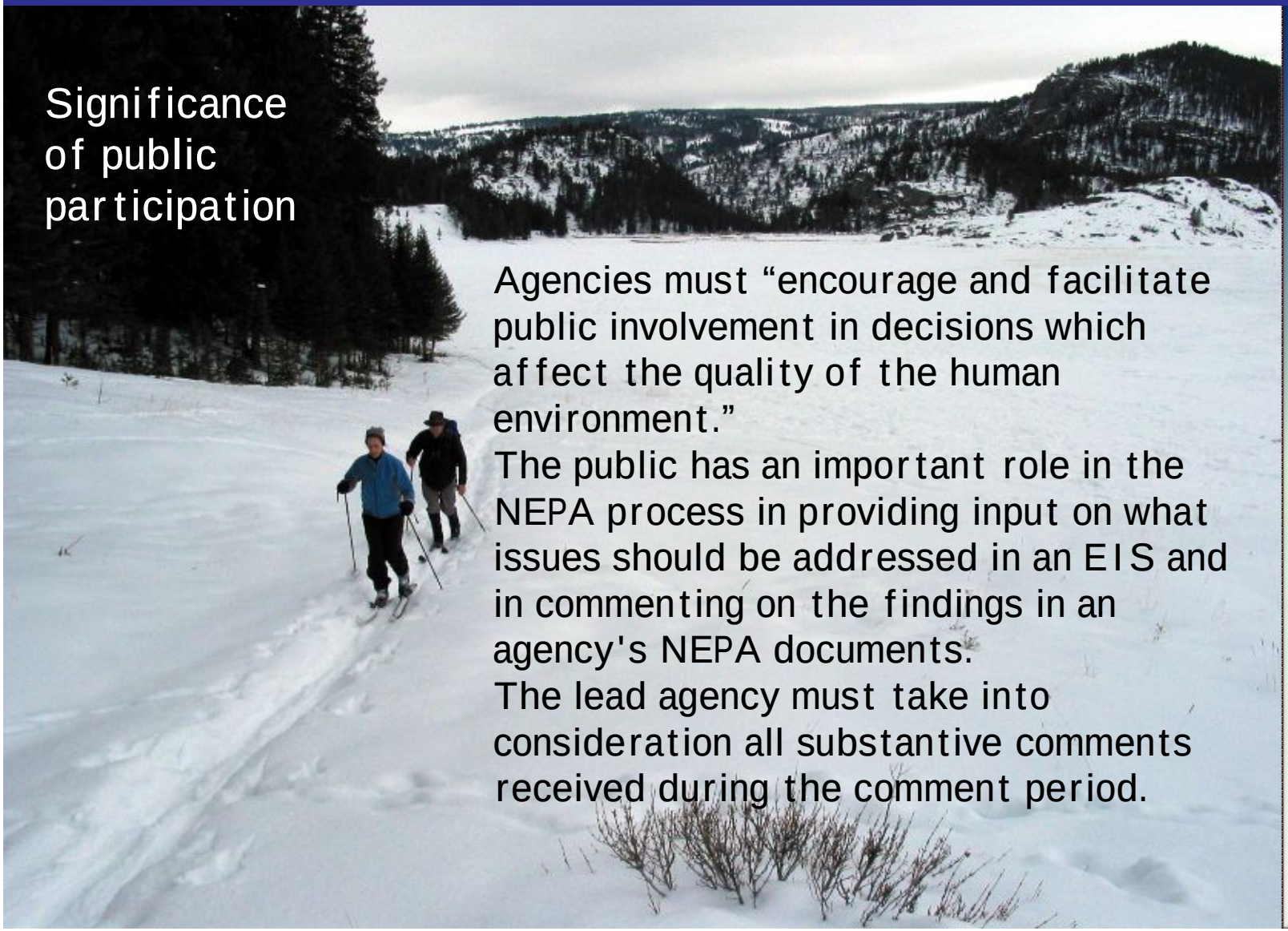

Significance of public participation

Agencies must “encourage and facilitate public involvement in decisions which affect the quality of the human environment.”

The public has an important role in the NEPA process in providing input on what issues should be addressed in an EIS and in commenting on the findings in an agency's NEPA documents.

The lead agency must take into consideration all substantive comments received during the comment period.

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National Park Service
U.S. Department of the Interior

Grand Teton National Park

Transportation Plan
Final Environmental Impact Statement

September 2006

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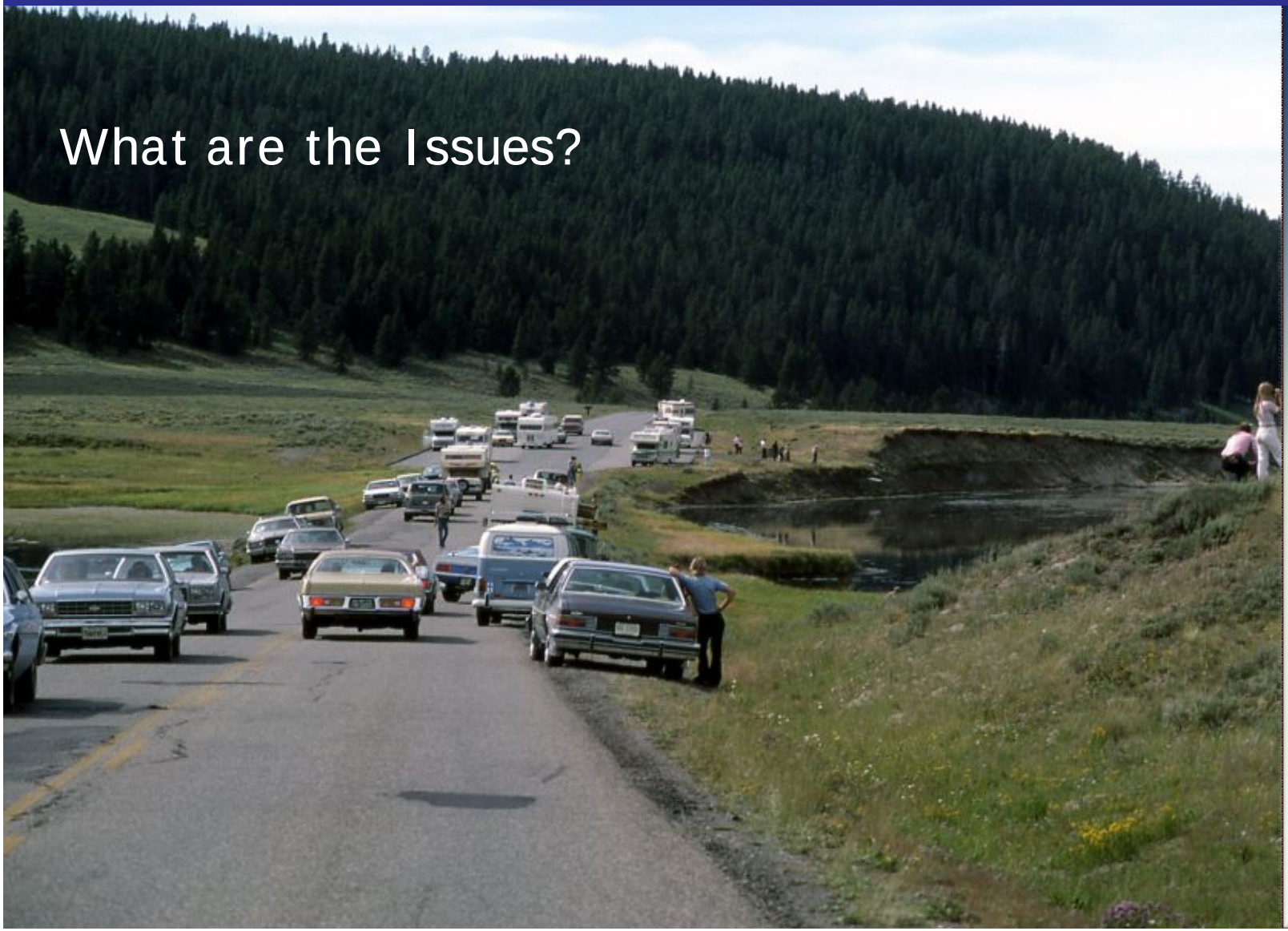

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CHAPTER 1
Purpose of and Need for Action

This Final Grand Teton National Park Transportation Plan/Environmental Impact Statement (Final Plan/EIS) addresses transportation related actions in Grand Teton National Park and the John D. Rockefeller, Jr. (JDR) Memorial Parkway. Grand Teton National Park and the JDR Memorial Parkway are located in the northwest corner of Wyoming, just south of Yellowstone National Park (YNP). Grand Teton National Park encompasses approximately 310,000 acres (125,550 ha) of land and the JDR Memorial Parkway comprises about 23,700 acres (9,591 ha) of land between the northern boundary of Grand Teton National Park and the southern boundary of YNP. For the purposes of this document, references to "Grand Teton National Park" or the "Park" hereafter refer to both Grand Teton National Park and the JDR Memorial Parkway.

This Final Plan/EIS evaluates and recommends a preferred system of transportation improvements within Grand Teton National Park including roadways and parking, development of a plan to evaluate whether there is a need for a pilot transit project within the Park, construction of improved road shoulders and multi-use pathways, improvements to developed areas, and development of traveler information systems. It also includes plans for testing several adaptive management strategies on the Moose-Wilson Road in order to gather information about the best way to maintain the existing character of the corridor while recognizing its sensitive wildlife, scenic, and historic values. This Final Plan/EIS also seeks to identify opportunities to develop transportation partnerships with neighboring communities (i.e., Jackson, Teton Village, and Teton County, Wyoming). The course of actions described in this Final Plan/EIS seek to improve and enhance the experience of park visitors and employees and address public safety concerns.

Project Background

Over the past several decades, Grand Teton National Park has worked to reduce the impacts of motor vehicles on core activity areas within the Park. The potential for additional impacts from future increases in visitation and motor vehicle traffic prompted park staff to undertake a transportation study (Charlier Associates 2001) to identify actions that would:

- Improve visitor experience by providing a broader range of choices for movement within and between key activity areas and destinations.
- Improve mobility within the Park with a better balance between motorized and non-motorized travel modes.
- Reduce the potential for congestion in key areas.
- Provide information to visitors to help avoid adverse impacts to park resources and to promote a variety of transportation options.

The transportation study relied on data gathered from visitor, staff, and concessioner surveys; analysis of trends in visitation and average daily traffic volumes; analysis of accident data; and interviews with staff from Jackson, Teton County, and private transit operators (Charlier Associates 2001). The transportation study made several recommendations that are included in the alternatives described in Chapter 2 of this Final Plan/EIS. The study recommended integrating proposed improvements, with plans adopted by the county and neighboring towns, as well as associated infrastructure improvements. Recommendations for and coordination with related planning efforts are addressed throughout this Final Plan/EIS. These related efforts include:

- *The Jackson Regional Transportation Plan*, adopted by Teton County and Jackson in January 2000 as part of the Regional Comprehensive Plan. The plan seeks to reduce and manage the impacts of traffic growth occurring in the valley and sets numerical goals for reductions in the share of single-occupant vehicle trips by 2020.
- *The Jackson/Teton County Transit Development Plan: 2000-2005 and Long Range*, adopted by Teton County and Jackson in June 2000. Specific transit development plan recommendations relevant to Grand Teton National Park include initiating public transit service between Jackson and Grand Teton National Park (Colter Bay) and developing a multi-agency transit center in Jackson.
- *The Jackson Hole Community Pathways Program*, a jointly-funded independent department of the Town of Jackson, under the Town Administrator, has built a network of off-road multi-use "pathways" radiating from Jackson. The Pathways Program has identified a

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Project Background

Over the past several decades, Grand Teton National Park has worked to reduce the impacts of motor vehicles on core activity areas within the Park. The potential for additional impacts from future increases in visitation and motor vehicle traffic prompted park staff to undertake a transportation study (Charlier Associates 2001) to identify actions that would:

- Improve visitor experience by providing a broader range of choices for movement within and between key activity areas and destinations.
- Improve mobility within the Park with a better balance between motorized and non-motorized travel modes.
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connection from the town north along U.S. Highway 26/89/191 to the south boundary of the Park as one of its highest priority segments.

Purpose of and Need for the Plan

The purpose of the Final Plan/EIS is to address and manage transportation-related issues in Grand Teton National Park. The need for the Final Plan/EIS results from a number of trends in park use and recreation preferences. While the overall number of recreational visits to the Park has remained relatively stable over the past decade, some of the most popular activity areas and trailheads are experiencing increased use. In these locations, parking areas are occasionally congested and impacts to natural resources (e.g., trampling of vegetation and the development of social trails) are evident in some areas. Furthermore, traffic between these key locations can be heavy at times.

Many visitors to Grand Teton National Park choose only to visit areas that can be easily reached from their vehicles. Particularly scenic and easily accessible areas, like South Jenny Lake, have become popular destinations, and their parking areas are sometimes crowded and congested during periods of peak visitation. Opportunities for visitors to enjoy the Park while minimizing impacts on resources can be enhanced by providing additional options for travel through the Park, as well as by providing better information about how to access key areas.

more slow speed and intimate park experience than does driving on some of the Park's other main roads. The road is constructed to a relatively low standard (e.g., a section of the road is unpaved). Travel volumes are approaching the point where the road physically may not be able to handle the capacity, and congestion occurs because of the inability of motorists to get around vehicles that have stopped in the roadway to view wildlife. Increasingly, persons seeking a convenient connection between the Wyoming Highway 22 corridor, Wyoming Highway 390 (commonly referred to as the Teton Village access road), and points within the Park use the road as a through-route. Currently approved plans for expansion of Teton Village, as well as the growth in background traffic on Wyoming Highway 390, could increase the traffic on the Moose-Wilson Road.

The alternatives in this Final Plan/EIS call for testing several different management strategies over the next 5 to 10 years to determine how the National Park Service (NPS) can maintain the existing character of the road and protect its special wildlife, scenic, and historic values.

Transportation issues facing the Park and neighboring gateway communities of Jackson and Teton Village are connected. Community transit provided through Southern Teton Area Rapid Transit (START) exists outside of the Park but does not extend into it. Similarly, multi-use pathways have been constructed to encourage bicycling and hiking elsewhere in Teton County, but these pathways do not extend into the Park. This Final Plan/

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Project Area Description and Location

Grand Teton National Park encompasses more than 333,000 acres (135,000 ha) in northwestern Wyoming, approximately 5 miles east of the Idaho state line and south of YNP. The current road system in Grand Teton National Park includes three primary highways: the Teton Park Road; U.S. Highway 26/89/191 (also known as the Outer Highway); and the North Park Road (Figure 1). The Teton Park Road links Moose to Jackson Lake Junction and provides access to major activity areas in the Park, including South Jenny Lake, Jenny Lake Lodge, and Signal Mountain. A regional route, U.S. Highway 26/89/191, parallels the Teton Park Road and serves as a more direct connection to YNP and eastern Wyoming. The North Park Road (U.S. Highway 89/191/287), which extends from Moran Junction through the JDR Memorial Parkway to the South Entrance of YNP, provides access to the Jackson Lake Lodge, Colter Bay, and Flagg Ranch activity areas. An important characteristic of Grand Teton National Park is its proximity to YNP and to numerous other public lands, including several large national forests and wilderness areas. A large portion of the Park's historic use has been drive-through sightseers visiting Jackson, YNP, and other destinations in the region.

Jackson and other developing areas within rural Teton County, Wyoming, represent the closest and most important communities in relation to transportation issues facing Grand Teton National Park. The Jackson frontcountry area occupies the valley floor with numerous lakes, a major river, and varying terrain. The valley floor is also a wild and scenic part of the Greater Yellowstone Ecosystem and contains important scenic, cultural, and wildlife resources. The frontcountry area is where most of the roads are located, visitor use is highest, and transportation issues addressed in this Final Plan/EIS are most relevant

Scope of Plan

During the initial scoping phases of this planning effort, which included several public workshops, a number of alternatives were considered, including a comprehensive system of transit, pathways, intelligent transportation systems, and other transportation-related infrastructure (see Chapter 5 for a summary). As the planning effort progressed, it became apparent that these original alternatives would be operationally and financially infeasible to implement. In addition, the scope of the initial alternatives was disproportionate to the types of transportation-related issues that exist in the Park and were of a magnitude that would be inappropriate to address outside of a long-term planning effort that would provide guidance for overall management of the Park.

Over the last year, while revising the Draft Plan/EIS, the Park initiated several studies to provide professional guidance on adaptively managing certain road segments (e.g., the Moose-Wilson Road), assessing the feasibility of transit within the Park, and monitoring the impacts

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The NPS has begun preparation of a long-term plan for managing winter recreational use in Yellowstone and Grand Teton National Parks. The purpose of the Winter Use Plan and EIS will be to ensure that park visitors have a range of appropriate winter recreational opportunities, while ensuring that these recreational activities are in an appropriate setting and do not impair or irreparably harm park resources or values.

Issues and Impact Topics

Issues and concerns were defined through the initial Transportation Study (Charlier Associates 2001) and further developed at internal and public scoping meetings, other public meetings, and working group meetings. These issues represented the range of opinions in regard to the purpose of and need for action and also addressed concerns about certain resources and values. Initial issues identified included visual quality, vegetation, soils, water quality and wetlands, threatened and endangered species, wildlife, cultural resources, transportation and traffic, visitor use and experience, employee use and experience, socioeconomics and local community impacts, and park operations.

Some issues were not carried forward as impact topics for detailed analysis in the Final Plan/EIS because impacts expected under any of the alternatives would not exceed negligible or minor adverse levels (see the "Impact Topics

Vegetation

Certain park areas are presently being used disproportionately, causing impacts on vegetation as visitors create social trails and/or impromptu parking areas when lots are full in peak season. Additionally, introduction and/or expansion of invasive nonnative species is an ongoing concern in existing developed areas, roadsides, and potential pathways.

Soils

Certain park areas are presently being used disproportionately, causing impacts to soils as visitors create social trails and/or impromptu parking areas when lots are full in peak season.

Hydrology and Water Quality

Transportation-related improvements may affect hydrology or water quality to the degree that they increase impervious surface, storm runoff, and non-point source pollution, or where pathways increase levels of public use and activity near surface water features.

Wetlands

Executive Order (EO) 11990, Protection of Wetlands, requires federal agencies to avoid, where possible, adversely impacting wetlands. Wetlands have been identified and mapped under the National Wetland Inventory Program

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CHAPTER 3
Affected Environment

Introduction

This chapter describes the resources and values that Final/Plan EIS alternatives could potentially affect. The NPS selected these resources and values based on public comment and review of environmental statutes, regulations, executive orders, and NPS Management Policies (NPS 2001). Several topics were dismissed in Chapter 1 from further in-depth analysis, including

- Floodplains.
- Wild and scenic rivers.
- Air quality.
- Soundscapes.
- Historic structures and cultural landscapes.
- Ethnographic resources.
- Museum collections.
- American Indian Trust resources.
- Land use.
- Environmental justice.
- Lightscape management.
- Prime and unique agricultural lands.
- Certain threatened and endangered species (whooping crane).
- Certain species of special concern (wolverine, harlequin duck, and trumpeter swan).
- Certain wildlife species (white-tailed deer, bighorn sheep, and fish).
- Energy consumption.
- Wilderness.

Refer to the "Impact Topics Dismissed from Further Analysis" section of Chapter 1 for the specific reasons for dismissal.

The resource descriptions in this chapter are intended to encompass only such information as is necessary to understand the probable effects of the alternatives. Chapter 4, "Environmental Consequences," describes the potential impacts of the alternatives on each of these resources and values.

Visual and Scenic Quality

The towering granite peaks of the Teton Range are the dominant scenic attribute of Grand Teton National Park. A notable example of fault-block topography is the range's high alpine environment, which exposes visitors to glacial cirques, glaciers, high angle canyons, tumbling streams, and a series of lakes. Meandering through the valley's foreground in a southwest direction is the Snake River, which provides a rich riparian habitat for the area's wildlife. The Snake River terraces are covered with a mix of open sagebrush (*Artemisia* spp.), conifers, and deciduous trees. These scenic resources are among the most spectacular in the western United States and are a primary reason for the region's popularity as a tourist destination.

Sightseeing, wildlife viewing, and experiencing the wilderness and open space are the most frequently mentioned reasons for visiting the Park (Littlejohn 1998). Ninety-eight percent of visitors reported sightseeing in the Park during their visit; 88 percent reported viewing wildlife; 71 percent took pleasure drives; and 59 percent viewed roadside or interpretive exhibits. The most popular places to visit, as reported in this survey, are South Jenny Lake (72 percent of visitors), Colter Bay (57 percent), and Jackson Lake Lodge (42 percent). Some 96 percent of visitors reported that scenic views were "very or extremely important" to their experience of the Park, while only 57 percent reported the same for recreational activities.

The three types of views within the Park include background, mid-ground, and foreground, as discussed below.

Background Views

These are seen at infinite distance from the viewer. In the Park, high-value background views are long or panoramic views of the Teton Range to the west, and the sagebrush flats to the east.

Mid-ground Views

These focus on elements that occupy the middle of the view plane. Examples of mid-ground views within the Park might be the Snake River valley floor, as seen from U.S. Highway 26/89/191; views of Willow Flats from the Jackson Lake Lodge observation deck; or views of Mormon Row from the Teton Park Road or Antelope Flats Road.

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- Floodplains.
- Wild and scenic rivers.
- Air quality.
- Soundscapes.
- Historic structures and cultural landscapes.
- Ethnographic resources.
- Museum collections.
- American Indian Trust resources.
- Land use.
- Environmental justice.
- Lightscape management.
- Prime and unique agricultural lands.
- Certain threatened and endangered species (whooping crane).
- Certain species of special concern (wolverine, harlequin duck, and trumpeter swan).
- Certain wildlife species (white-tailed deer, bighorn sheep, and fish).
- Energy consumption.
- Wilderness.

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CHAPTER 4
Environmental Consequences

Introduction

This chapter describes the methods and assumptions used to analyze impacts of the alternatives described in Chapter 2 and presents the results of the impact analyses. For each alternative, the direct, indirect, and cumulative environmental effects are analyzed for each impact topic presented in Chapter 3.

Methodology and Assumptions for Assessing Impacts

Analysis of the environmental consequences of the alternatives proposed in this document includes an examination of several factors for each resource, including type of impact, duration of impact, and context and intensity of impact. The discussion for each impact topic includes threshold definitions and an analysis of the impacts of each alternative, followed by an assessment of cumulative impacts and a conclusion.

The NPS assumed that the Final Plan/EIS would be in effect for the next 5 to 10 years, during which time there would be a slight to modest increase in visitation and a slight increase in traffic volumes. These assumptions are based on past visitor trends, which show relatively stable visitation numbers since 1993, even during years when the surrounding communities were experiencing a much

are the impacts on the environment that result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions.

Context, Intensity, Duration

Impacts are described as to their context, intensity, and duration. Context generally refers to the geographic extent of impact (e.g., localized, widespread, or regional). In general, localized impacts have been described by relevant road segment for each alternative (i.e., south boundary to North Jenny Lake Junction, North Jenny Lake Junction to Colter Bay, and the Granite Canyon Entrance Station to Moose). Impact intensity is the magnitude or degree to which a resource would be beneficially or adversely affected. The thresholds used to assess intensity of impact for each resource topic are defined under each impact topic heading. Impact duration refers to how long an impact would last. For the purposes of this Final Plan/EIS, duration of the impact is also specified separately for each impact topic.

Area of Analysis

The area of analysis for impact assessment is defined separately for each impact topic and is identified at the end of the impact thresholds definitions for each topic. The area of analysis serves as the geographic basis for assessment of impacts resulting from the actions proposed under each alternative, as well as cumulative impacts, and

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historic, or commemorative locations within the Park.

In its role as steward of park resources, the NPS must ensure that acceptable park uses would not cause impairment of, or unacceptable impacts on, park resources and values. When proposed park uses and the protection of park resources and values come into conflict, the protection of resources and values must be predominant.

new form of park use would be allowed within a park only

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CHAPTER 5
Consultation and Coordination

History of Public Involvement

This chapter describes the history of public involvement leading up to and during development of this Final Plan/ EIS. Public participation in the planning process helps to ensure that the NPS fully understands and considers the public's interest. Through public involvement, the NPS shared information about the planning process, issues, and proposed actions. In turn, the planning teams were informed of the concerns and values of those groups and individuals that participated in the process. Government agencies and other public constituencies were also consulted as part of public involvement and in compliance with laws and regulations. With the help of public participation, the NPS is able to make better-informed decisions and improved plans.

Public and agency participation throughout the planning process allowed the planning team to:

- Analyze and incorporate comments from previous planning efforts.
- Collect scoping comments to help define the range of issues to be addressed.
- Provide opportunities for the public to obtain the knowledge necessary to make informed comments.
- Consult with other management agencies.

Three well-publicized community workshops (i.e., public meetings) were held in the summer and fall of 2000 to give the Jackson-area residents an opportunity to learn about and contribute to the study.

Initial Planning Workshops for Transportation Plan, September 17-19, 2001

An initial series of planning workshops were held on September 17-19, 2001, in Jackson, Wyoming. Separate meetings were conducted with approximately 30 park staff, representing a broad cross-section of functions (administrative, resource management, interpretation, and rangers); with the Technical Information Exchange Group; and with the public. The purpose of these meetings was to:

- Introduce the project.
- Reaffirm the Park's mission and significance.
- Assess existing conditions and identify desired future conditions.
- Identify actions that might help to bring about those desired future conditions.

Approximately 30 members of the public attended and participated in small breakout groups. Issues discussed are incorporated into the "Purpose of and Need for Action" section of Chapter 1.

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CHAPTER 6
Compliance with Federal or State Regulations

This chapter describes the key pieces of legislation that form the legal context for development of the Final Plan/ EIS. These pieces of legislation have guided development of this document and would continue to guide its implementation.

National Park Service Enabling Legislation

Public Law 81-787, 1950

This Law established Grand Teton National Park as a 310,521-acre (125,663 ha) entity that includes portions of both the Teton Range and Jackson Hole. The legislation designated and opened rights of way over and across federal lands within the exterior boundary of the Park for the movement of persons and property to and from national forests and state and private lands adjacent to the Park. The rights of residents and others legally occupying and using lands within the Park in 1950 were also specified in the Law. The grazing rights protected by this Law have expired but are preserved by Public Law 105-81 (1997), the Open Space Study Act.

Organic Act, August 25, 1916 (National Park Service Organic Act), Public Law 64-235, 16 USC §1 et seq., as amended

intense development, such as visitor centers, museums, drive-in campgrounds, etc., will be entirely accessible and areas of lesser development, such as backcountry trails and walk-in campgrounds, may have fewer accessibility features). All development proposed must be consistent with this Act.

Architectural Barriers Act of 1968, Public Law 90-480, 82 Stat. 718, 42 USC §4151 et seq.

This Act establishes standards for design/construction or alteration of buildings to ensure that physically disabled persons have ready access to and use of such buildings. The Act excludes historic structures from the standards until they are altered. All development proposed must be consistent with this Act.

Council on Environmental Quality Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (40 CFR Parts 1500-1508)

The Council on Environmental Quality (CEQ) regulations for implementing NEPA establish the process by which federal agencies fulfill their obligations under the NEPA process. The CEQ regulations contain the requirements

APPENDIX D
Responses to Comments on the Draft Plan/EIS

This appendix summarizes all substantive comments received on the Draft Plan/EIS and provides responses to comments, as required by Council on Environmental Quality regulations. The appendix includes the following elements:

- Overview of the process for commenting on the Draft Plan/EIS.
- Analysis of comment types, numbers, and content, with summaries of substantive comments.
- Comment text from agency letters.
- Responses to substantive comments.

In accordance with 40 Code of Federal Regulations (CFR) 1503.4[5][b], summaries of all substantive comments received on the Draft Plan/EIS appear in this appendix. Comments in favor of or against the proposed action or alternatives, or comments that only agree or disagree with NPS policy, are not considered substantive. A substantive comment is one that does one or more of the following:

- Questions, with reasonable basis, the accuracy of information in the EIS.
- Questions, with reasonable basis, the adequacy of the environmental analysis.
- Presents reasonable alternatives other than those

Overview of the Public Comment Process

In April 2000, the National Park Service (NPS) undertook a transportation study to provide basic information regarding transportation issues in Grand Teton National Park. The study served as a foundation for the next step in the process, which was the development of a Transportation Plan, initiated in September 2001.

The Park conducted a series of public scoping meetings and workshops in Jackson, Wyoming, during late 2001 and early 2002, and work continued on the Plan during 2002 and 2003. In 2004, the NPS decided to scale back the Plan to focus on actions that could be achieved within a 5- to 10-year period.

The NPS developed the range of reasonable alternatives, involving a variety of strategies to address transportation within the Park. On May 27, 2005, the Draft Plan/EIS was released for public review and comment. The NPS subsequently extended the comment period, which ended on August 25, 2005, providing a 90-day comment period. A total of 2,638 documents were received through the NPS Planning, Environment, and Public Comment website, fax, and direct mail.

Some, but not all, commentors expressed a preference for

Letter 129654—USDA Forest Service, Bridger Teton National Forest

Correspondence Text

Thank you for the opportunity to comment on the GTNP Transportation Plan Environmental Impact Statement. We believe the Preferred Alternative presents a great improvement over the existing condition while allowing a moderate level of investment and impact to the environment. Implementation of this alternative will also help reduce environmental impacts to the adjacent National Forest system lands.
We have the following specific comments on the EIS:

1) We are concerned about the impact of the project on habitat and wildlife species including moose, elk, pronghorn antelope, and bears. For this reason, we support that pathways should be located adjacent to existing roads where possible. We further suggest that the project be phased in over time so that the impacts of the pathways on wildlife can be monitored and adjustments made, if needed.

2) The EIS states that transit service would begin from the MAC site. We suggest the wording be amended to include "or an alternative site within the Town of Jackson."

3) Adding some information on a proposed implementation schedule would be a good addition to the document. Does this project need to compete with other park maintenance needs for funding? How would implementation of this project be affected by other GTNP priorities?

Thank you again for the opportunity to comment. We look forward to the implementation of the Preferred Alternative and an improved transportation system in Grand Teton National Park. If we can be of any assistance in the implementation process, please do not hesitate to call.

Carole "Kniffy" Hamilton, Forest Supervisor

Response

See Response to Comments, numbers 17, 18, and 61.

Letter 129472—Wyoming House of Representatives

Correspondence Text

I appreciate the opportunity to respond to this Draft EIS. I consider Grand Teton National Park, and the values it is charged with preserving, to be the basis for the healthy, sustainable economy not only in the legislative district I represent but also throughout the Greater Yellowstone Ecosystem. I fully appreciate the challenge presented to you, and to the National Park Service, of dealing with, tolerating, or minimizing the impacts on GTNP resulting from ever increasing developments outside of the park.

An additional motivation to comment comes from my experiences in GTNP and Teton County with transportation issues since 1954. I was first exposed as an engineering technician and later as project engineer with the Bureau of Public Roads (predecessor of the Federal Highway Administration) from 1954 to 1965 in Grand Teton and Yellowstone National Parks. Later I was a private engineering consultant in Teton County, including serving as Teton County Engineer on a consulting basis for transportation studies. For a period of several years I served as the National Parks and Conservation Association "park watcher" for Grand Teton National Park.

GENERAL COMMENTS
The greatest deficiency in the document is the lack of a demonstrated need for any of the proposed improvements other than additional parking space. I realize that there has been a lot of suggestion for a more multi-modal transportation system in GTNP, but see no statistics or surveys to indicate the magnitude of that need.

The only relevant information I have come across is in a recent Bison-Elk study within table 3 11 on page 171. That table, presenting the results of a Loomis and Caughlin study in 2004 indicates that the relative importance of 16 various recreational activities to non local visitors coming to Jackson Hole varied dramatically from viewing wildlife and scenery (highest ranking) to biking/mountain biking (lowest ranking). This data suggests that further exploration should be done in a statistically based sampling of the need for both bicycle facilities and transit. It is obviously important in such surveys to segregate groups sampled by criteria such as Nonlocal Visitors & Local Visitors, further categorized as Road Bikers or Recreational Bikers.

This type of analysis I would expect to be completed prior to committing to any obligation of significant funding for such facilities. The analysis should also consider what other GTNP funding needs will be displaced or further

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Responses to Substantive Comments

Roadways and Parking

1. **Comment:** The NPS should make a variety of improvements and changes in the design of park roads, including U.S. Highway 26/89/191 between the south park boundary and Moran Junction and U.S. Highway 287 between Moran Junction and the east park boundary. Suggested improvements include widened shoulders, turn lanes, roundabouts, etc.

   Response: This Final Plan/EIS is intended to address a 5-10 year period during which certain projects can be accomplished and for which funding may reasonably be anticipated to be available. The Final Plan/EIS is not intended to comprehensively address all aspects of the Park's road system and transportation infrastructure, such as road design, maintenance and construction that is not likely to occur within 5-10 years. During planning for future projects, the NPS will consider what improvements may be necessary and appropriate and provide opportunities for public involvement through the National Environmental Policy Act (NEPA) processes associated with those projects.

2. **Comment:** The NPS should close the Teton Park Road between Moose and Signal Mountain.

   Response: This alternative was considered but dismissed from further consideration, as described in Chapter 2.

4. **Comment:** A north crossing of the Snake River should be constructed between Wyoming Highway 390 and U.S. Highway 26/89/191 to provide a more direct route between Teton Village and Jackson.

   Response: Construction of such a road is not within the jurisdiction of the NPS and is beyond the scope of this plan.

5. **Comment:** The NPS should keep the size of parking lots small in order to limit the number of visitors to areas facing increased use.

   Response: The NPS recognizes that the capacity of parking lots tends to regulate the amount of visitor use in certain areas of the Park, although carrying capacities have not been established nor have parking lots been specifically designed for that purpose. The NPS also recognizes that some parking lots may receive increased use from visitors that use them as a starting or ending point for a trip on the new pathways. None of the alternatives in the Final Plan/EIS provide for the expansion of parking lots, although modifications may be made to some parking lots to better utilize the area within existing footprints.

6. **Comment:** Bicycle lanes, marked with striping and a painted bike symbol could be used instead of widened shoulders.

   Response: According to standards of the American Association of State Highway and Transportation

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Department of Justice
Federal Bureau of Investigations
Social Security Administration
Federal Aviation Association
Federal Highway Administration
Census Bureau
Federal Trade Commission
Government Printing Office
National Institute of Health
Department of Housing and Urban Development
Bureau of Indian Affairs
Federal Prison System
Occupational Safety and Health Administration
Marine Mammal Commission
Kennedy Space Center
Peace Corps

National Environmental Policy Act

Agencies MUST consider environmental impacts in decision-making.
Agencies MUST use a systematic and interdisciplinary approach.
Agencies MUST document their decisions using Categorical Exclusions, Environmental Assessments, and Environmental Impact Statements.
Agencies MUST create a process for other agencies, organizations, and the public to have meaningful input into the decision-making process.

National Environmental Policy Act

The spirit of the law, the intention of NEPA, is to foster more environmentally friendly decision-making on the part of the federal government.

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