APPENDIX 8

PUBLIC COMMENTS ON THE DRAFT EIS
BLM RESPONSES TO COMMENTS

COMMENTS AND RESPONSES

Comments received through U.S Mail, electronic mail, and at the March 26 public hearing are included here and answered. Many public comments received were essentially opinions in support of or in opposition to one or more management prescriptions. The comment letters are reproduced in their entirety, followed by BLM responses to substantive comments in Table A8-1.

1

jkanglers@aol.com
03/05/03 02:19 PM

To: prendale_wymail@blm.gov
cc:
Subject: Snake River RMP

To whom it may concern:

I am a commercial fishing outfitter on the Snake River in Jackson Hole. I am writing with a concern I have with your preferred alternative for the Snake River RMP. It would seem that some of your action alternatives hand over control of recreation activities to another government agency (The National Forest Service or National Park Service). I am one of a small number of outfitters who operate on BLM land and do not have Forest Service or Park Service Permits. It is my concern that if control is handed over to one of these other agencies, they will allow their current permittees to operate on BLM lands without offering new permits to companies that don't hold Forest or Park Permits. Handing over control to these other agencies could put many small outfitters out of work.

I understand that the BLM does not want to continue to manage the Wilson to Southpark stretch of the Snake River, but I would ask that the RMP looks after those of us who make our living on it. If control is handed over to another agency, please make them issue a new set of permits to outfitters that currently use the BLM access points exclusively.

Thank you for your attention to this matter and please don't hesitate to call or write me with any questions or concerns.

Enjoy,

David Ellenstein
Jackson Hole Anglers
PO Box 9805
Jackson, WY 83002
307-699-5717

2

time.

Thank you, Scott Hocking, owner Teton Troutfitters guide service.

Sincerely,

Signature

. header.htm

2

"teltonfrout" <teltonfrout@wildwest.net>
02/28/03 07:08 AM

To: "BLM Snake R. RMP <prendale_wymail@blm.gov>
cc:
Subject: BLM letter - S.F.w/l.-access.7-wk 03.03.doc

Teton Troutfitters

PO Box 6330 Wilson, Wy. 83014
office:307 733-5962 Fax 307 733-5360
info@tetontroutfitters.com

February 26, 2003

Dear Snake RiverRMPteam leader,

This letter is in reference to the BLM plan to develop a boat ramp at the SouthParkSnake Riverlocaeo, in TetonCounty.

Please allow the Forest Service to manage this proposed boat ramp in Teton County.Growingriver use and quality of river experience need the direction that the Forest Service has already allowed for in their management plan for the Snake River in Teton Co., Wy.

I am unable to attend your meeting on March 26,2003at the Teton Co. Commissionersmeeting room. I will attend these meetings whenever possible, and would appreciate be kept up to date on this proposal.

Please enter my e-mail address on your contact list and feel free to update me at any

3

Beatrice van Ruijven
<cleanerbee@hotmail.com>
03/14/03 07:12 AM

To: prendale_wymail@blm.gov
cc:
Subject: Snake River BLM

I applaud your plan to put your bin land along the Snake into land preservation. Let's not let it go to private developers who have access to those in the know. . Thanks, sincerely Bea van Ruijven post office box 333, wilson, Wy. 83014 phone 307 733 6428

4

U.S. Department of the Interior
Bureau of Land Management
Pinedale Field Office
Pinedale, Wyoming

Open House for Snake River Resource Management Plan
Draft Environmental Impact Statement

3/26/2003

LEAVE COMMENTS AT REGISTRATION TABLE OR MAIL THEM TO: Bureau of Land Management; Kellie Bonifer, Project Manager; Pinedale Field Office, P.O. Box 768, Pinedale, Wyoming 82941.

Please Read Carefully

Comments, including names and street addresses of respondents will be available for public review at the, Wyoming during regular business hours (7:30 a.m. to 4:30 p.m.) Monday through Friday, except holidays. Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently at the beginning of your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety.

Name/Organization: LEN CARDIMAN

Address: PO Box 1330 Jackson **Zip Code:** Wyo 83014

Comments:

Re BLM Snake River Riparian Parcels in Teton County Wyo

1 In support [illegible]

2 (-) Consolidate of contiguous parcels into 5 or 6 larger repeat sites

3 (-) Include basic [illegible] as a [illegible] [illegible] [illegible]

8

Richard Greenwood
<Rich@GreenwoodMap.com>
04/01/03 10:49 AM

To: pinedale_wyoming@blm.gov
cc:
Subject: Snake River management plan comments

Dear Reader,

1 I am writing to express my support for management of the Snake River BLM lands for public access. Although the private lands within Jackson Hole are surrounded by vast areas of public lands, access is not as easy as it might seem. All too frequently access to public lands, or the Snake River recreational easement, is blocked by private ownership. In many cases a strip of private land only a few hundred yards in width precludes convenient access public lands, forcing people get in their car and drive to recreation.

One example that comes to mind are the BLM lands in Sections 24 and 25, T40N, R117W (see link below for a map). The BLM lands "connect" Fall Creek County Road to the Snake River, but because of fencing and "No Trespassing" signs, the public has no idea where the BLM land is.

2 I would imagine that the BLM is under pressure from adjoining lands owners to NOT manage these lands for public access, and to dispose of these into private ownership. Don't do it! The public has a right to use these lands and the BLM has the responsibility to protect the rights of the general public over the self interest of a few individuals.

The March 21, 2003 issue of the Jackson Hole daily ran a story that suggested some frustration on the part of the BLM at a lack of attendance at a recent meeting. I would point out that we all have busy lives – you, me, most everybody – we all have trouble finding time to do everything we would like to do. So please do not interpret a lower than hoped for attendance as a lack of support. It is your job to manage these lands, the rest of us have to take time away from our jobs, or personal lives, to attend meetings.

Sincerely,
Richard Greenwood

Link to map of BLM land between Snake River and Fall Creek Road:

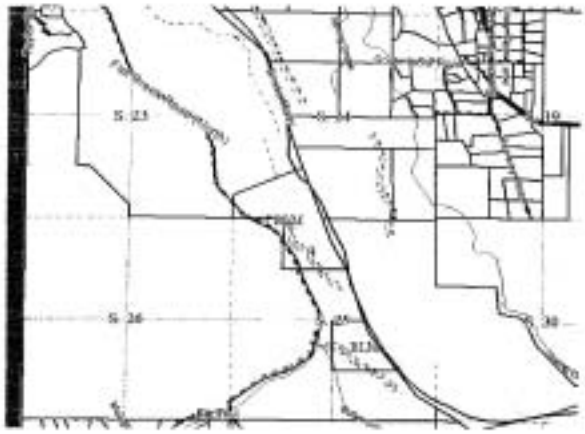
http://www2.intoinwyo.org/mapserver/mapserv.exe?MAP_LEGEND_STATUS=&MAP_REFERENCE_STATUS=ON&imgext=-2421170.0177712+1360679.667272+-2439608.8672+3[illegible]

8

GIF image 645x485 pixels

http://www.Greenwoodmap.com/maps/[illegible].gif

8



1 of 1

4/4/03 4:32 PM

8

2&template=c.html&layers=Roads+PLS+ownership+Water+state_hwy&zoomdir=2&imgxy=264+145&imgbox=264+145+264+145&map_size=645+485

Richard W. Greenwood, PLS
Greenwood Mapping, Inc.
Rich@GreenwoodMap.com
(307) 733-0305
http://www.GreenwoodMap.com

9

"Hall, Matthew"
<mwhall@pardee.com>
04/02/03 07:16 PM

To: "pinedale_wyoming@blm.gov" <pinedale_wyoming@blm.gov>
cc:
Subject: Snake River RMP

To Whom It May Concern:

1 I write to urge the Bureau of Land Management to retain ownership of
the 23 parcels along the Snake River in Jackson Hole, totaling more than
2 1,800 acres, which it is considering conveying to other agencies, and to
manage them in a way that provides maximum protection for their natural and
3 wildlife values. If the BLM does choose to transfer any of these tracts to
other agencies, I urge that they be designated as "Areas of Critical
Environmental Concern" and managed primarily to protect natural and wildlife
values. These riparian areas are important wildlife habitat and migration
routes, and they provide BLM with an opportunity to counterbalance to some
small degree the damage to these values occurring on other BLM properties,
such as along the Green River, where wildlife interests are being sacrificed
to allow the development of natural gas reserves. That trade off may be
justified there but great care is being done nonetheless, and this current
situation provides some opportunity for BLM to redress the balance. There
are other areas in Jackson Hole where recreational values can and should be
a major land use component, but the BLM should use its unique position to
protect wildlife values in these immensely important areas.

Thank you for your consideration.

Sincerely,

Matthew W. Hall
85 Huckleberry Drive
Jackson, WY 83001

10

3/30/03

ATTN:
SNAKE RIVER RMP TEAM LEADER

1 SORRY WE MISSED THE MEETING. OUR COMMENT IS THAT WE SUPPORT 100% KEEPING BLM LANDS ALONG THE SNAKE RIVER PUBLIC. WHO MANAGES OR ADMINISTERS THE PROPERTY IS NOT AS IMPORTANT AS LONG AS IT IS A PUBLIC AGENCY AND PUBLIC ACCESS IS GUARANTEED AND PROTECTED. PUBLIC LAND NEEDS TO REMAIN PUBLIC.

THANKS

KURT & DEB HENRY
P.O. BOX 115
JACKSON, WY 83001

11

"Gillespie, Garth"
<garth.gillespie@swuds.com>
04/03/03 12:58 PM

To: "pmedds_wyrsd@blm.gov" <pmedds_wyrsd@blm.gov>
cc:
Subject: Snake River Lands

To: The Snake River RMP Team Leader

I am writing you to let you know that I am in agreement with the policy being put forth to keep BLM lands throughout the Teton County valley open to the public. I have read two articles in recent papers that there has not been much public input on the issue and that has worried some officials. This interests me that some officials are concerned that public support is not making their voice heard. I would like to turn this around and say that maybe most of us are in agreement with the policy set forth and we are happy with the decision. Why in these times that every issue is debated to death do we always have to create controversy? The argument I hear that when there is a lot of comments is that there tend to be more letters and these are discounted. For mine I believe the general public is supporting the issue and we should not look for reasons why people are not participating. In the BLM had decided to develop all these lands I believe we would see lawsuits, delayed, frustrating act. Let's save some money and move forward with the plan.

As for the plan—I am in full agreement with the plans set forth. I believe we could get a little more creative as the plans move forward. For example: BLM/Forest service campground at the South Snake river bridge property would be overcrowded by out summer visitors. Here is a property right on the Snake River, bridge property would be overcrowded by out summer visitors. Here is a property right on the Snake River, ample land for campers, and close to Jackson. As for property land locked on the snake we should post those areas and encourage day use for fishers. Maybe the forest service could set up overnight camping on the Snake—a much needed resource. I also believe that those properties should stay open for gravel mining as we are going to continue to need gravel in the valley and the digging that takes place seems to encourage island growth in the Snake River.

2 3 4

With that said, I agree with the plan outlined by the BLM.

Regards,

Garth and Christy Gillespie
P.O. Box 11606
Jackson, WY 83002
307-734-3808

12

"mike crotty"
<mlfbgM730@hotmail.com>
04/03/03 03:23 PM

To: pmedds_wyrsd@blm.gov
cc:
Subject: Snake River land

As a lifelong Wyoming resident and a seventeen year resident of Teton County I vehemently oppose any more land giveaways to the wealthy elite. For way too long I have seen our Land management bureaucrats make sweetheart deals with wealthy land owners and developers at the cost of public trust.

Some of the BLM acreage in question lies along the Wilson levee,which was fenced off and the little access roads into the trees were trenched giving civing public land the appearance of private land. Then without any public input the gate that was once ten and a half to three miles down the levee road was moved up to the Wilson bridge undoubtably at the behest of a few wealthy landowners. The Wilson levee is an object lesson how the public is either denied or hindered access to their own lands by a few bureaucrats to favor a handful elite. By denying motorized traffic along the levee the powers that be also denied access to the elderly and other physically impaired to some decent fishing. This same levee is maintained at no small cost by taxpayer money. The public must rise up against any more dubious deals made with their lands.

1 What than should be done with the land in question? It should be kept public that's for sure. Why not give it to Fish and Game who could manage it in partnership with Ducks Unlimited, Trout Unlimited, Rocky Mountain Elk Federation and like groups. These river bottom parcels are way too precious to be turned into yet more snobbish gated communities with their goddamned golf courses. The Tetons might be the backbone of this valley but the Snake River is it's life's blood. very sincerely yours Mike Craig,Jackson Wy.

13

jimwallace
<jimwallace@flt.newyorklife.com>
04/03/03 03:50 PM

To: "pmedds_wyrsd@blm.gov" <pmedds_wyrsd@blm.gov>
cc:
Subject: Snake River RMP Team Leader

Thank you for allowing continued input and most importantly, having the vision to see that public lands in Teton County are very limited and continue to decrease at an alarming rate. Thank you for caring.

As a 19year plus resident of Teton County and past river guide on the Snake, I truly understand how important it is to maintain these riparian lands in public trust. Such lands are few and critical to wildlife. The general recreationists needs these lands today and more so tomorrow. The development, poor land use and rural style character of some of property owners on the Snake River have greatly stressed wildlife and recreationists. Without these lands in public trust, the Snake River, from the Moose Bridge to the South Park Bridge could become a large irrigation ditch barren of wildlife and native plants. An outrageous or this may sound, you know this could become reality.

Although my voice is heard through this correspondence, many interested and affected persons remain silent. However, I can offer witness that the large majority of citizens of Teton County, and I suspect, the vast majority of the State of Wyoming and the United States do strongly support maintaining these lands in public trust.

1 Thank you for keeping America great and beautiful. Your children and grandchildren will be proud of you for doing the right things.

If I can help, in anyway, please let me know. Best wishes. Jim Wallace

14

"Denny Emory"
[illegible]
04/08/03 01:PM

To: rjrondale_wymail@blm.gov
cc:
Subject: Snake River RMP

Greetings from Nilson, Wyoming.

1 I want to record my strong support for the BLM lands along the Snake River in Teton County, Wyoming to be managed for public access and maintained in public ownership. Under no circumstances should these lands be sold or transferred into private ownership.

As this region continues to grow in population and attract an innumerable number of visitors every year, recreational pressures increase and the need for public access to a resource like the Snake River is invaluable and irreplaceable.

Thank you for your time and your efforts.

Denny Emory
P. O. Box 136
Nilson, Wyo. 83014
307 / 733-3681
DennyEmory@earthlink.net

Thank you.

16

Greater Yellowstone Coalition

13 South Willson, Suite 2 • PO Box 1874 • Bozeman, Montana 59771 • phone: (406) 586-1593
fax: (406) 586-8021 • email: gyc@greateryellowstone.org • web: www.greateryellowstone.org

April 11, 2003

Kellie Roadifer
Snake River RMP Team Leader
U.S. Bureau of Land Management
Pinedale Field Office
P.O. Box 768
Pinedale, WY 82941

RECEIVED
APR 14 2003
PINEDALE RESOURCE AREA OFFICE

RE: Snake River Resource Management Plan

Dear Ms. Roadifer:

Thank you for providing us the opportunity to comment on the DEIS for the Snake River Resource Management Plan. The following comments represent the views of the Greater Yellowstone Coalition. GYC is a non-profit conservation organization of over 12,000 members dedicated to protecting the lands, waters, and wildlife of the Greater Yellowstone Ecosystem. Based in Bozeman, Montana, we also have offices in Jackson, Wyoming, and Idaho Falls, Idaho.

Overview

Let me begin by saying that we appreciate the BLM's overall objective of protecting the 1,073 acres of surface lands along the Snake River and the 15,123 acres of federal mineral estate from activities that would compromise the area's natural-caliber fish, wildlife, recreational, and visual resources. Clearly, preserving the existing natural values of the BLM lands along the Snake and Gros Ventre rivers far outweighs the short-term economic benefits that would be derived from mining, oil and gas development, grazing, OHV use, and other potentially
1 damaging activities. It is for this reason that we support Alternative C – BLM Management for Preservation – with a few suggested changes. Please refer to the attached tables for details.

Land Ownership

The BLM states in the DEIS that the reason it wants to dispose of these riverfront lands is because they are located far from the Pinedale District Office, they are scattered and irregularly shaped, and because adjacent landowners along the Snake River have expressed an interest in acquiring them. While all of these things may be true, there are other ways to address these challenges without disposing of these lands. For instance, if management oversight is difficult
2 because of the distance from Pinedale, the BLM could easily transfer some of its Pinedale staff to Jackson, where they could share space with another federal agency that already has an office there. It is our understanding that even if the BLM chooses to develop a Recreational Area Management Plan, it would need only two or three staff in Jackson.

Idaho Office: 502 North Placidus Avenue, Idaho Falls, Idaho 83402 • phone: (208) 522-1927 • fax: (208) 522-9148
Wyoming Office: 220 East Deloney Ring, PO Box 6957, Jackson, Wyoming 83001 • phone: (307) 734-9884 • fax: (307) 734-9884

15

"Sarah ."
[illegible]
04/11/03 08:00 AM

To: pinedale_wymail@blm.gov
cc:
Subject: snake river

I don't know if I'm too late to send this, but it can't hurt. I grew up in Pinedale and spent every
1 weekend possible on either the Green River or the Snake honing my new kayaking skills and marveling at the landscape. The sections of land that are in question should undoubtedly be used for public access. Fishing, boating (tubing, kayaking, canoeing), general hiking and lounging are just a few of the recreational activities that drive the Jackson Hole community. If the land is developed for more houses or used to unknowingly drill for oil, it will eventually die and become brown and barren. The lure of the land will drastically decrease and people won't come from hundreds to thousands of miles away to look at what we have. The economy will die. But more importantly, the mental escape the land offers will disappear. People won't be able to float the river with easy access to the put in and take out when all they want to do is relax for a day. Another consideration is the habitat the section of the river offers animals. Often I paddled past a bald eagle flying overhead or perched on a rock feasting on a trout. Herons sit on the banks and deer and moose patrol the shores. Please put the land to good use and apply it to public access.

-Sarah Maclean

16

Likewise, if it is problematic that the BLM parcels along the Snake River are scattered and
3 irregularly shaped, the BLM could seek to consolidate them by designating a Special Project Area, thus allowing Land and Water Conservation Act funds to be tapped. When confronted with similar challenges along the South Fork of the Snake River in the mid-1980s, the BLM's Idaho Falls field office chose to aggressively consolidate its scattered riverfront lands rather than dispose of them. Since 1991, the Idaho Falls field office has acquired fee title to 24 properties and conservation easements on 23 other properties at a cost of nearly $22 million. In so doing, they have assembled a river corridor that is second to none for its abundant wildlife, thriving cutthroat fisheries, and diverse, high-quality recreational opportunities. The reason they were able to accomplish this impressive feat was because they looked at their scattered properties as a potential asset worth cultivating rather than a liability that needed to be unloaded.

4 As for the option of selling BLM lands to adjacent landowners, we strongly oppose this alternative for multiple reasons. First, it makes little sense to sell public lands to private interests when demand for public recreation along the Snake River already exceeds supply. As the DEIS states on page 67, "No other lands along the Snake River in Teton County provide the type of river access, close to town and residences, available on public lands in the planning area." Second, as evidenced by the Canyon Club fiasco in the Snake River Canyon below Hoback Junction, there exists the very real possibility that if the BLM sold its riverfront lands to private interests, they would be developed in a manner that damages irreplaceable ecological, recreational, and visual resources. Indeed, had the Forest Service acquired the Edgecomb property when it was up for sale a few years ago, the Canyon Club development never would have happened, and the U.S. Fish and Wildlife Service never would have had to issue an incidental take permit allowing the killing of 18 federally-threatened bald eagles.

5 Finally, while it may be tempting to hand these parcels over to a non-governmental organization such as a land trust, we discourage this for two reasons. First, it is highly unlikely that a land trust would have the resources (i.e. staff and money) to manage these lands for recreational use, as this is not a primary objective of most land trusts. And second, because riverfront property around Jackson is so expensive, it would be nearly impossible for a land trust to acquire adjacent lands in order to establish a more contiguous public corridor. Having said that, if the BLM opts to transfer some of its parcels to non-governmental organizations or private interests, we believe that any qualifying lands must first have a conservation easement placed upon them.

Mining, Oil & Gas Development, and Salable Minerals

While we agree with the majority of the management actions described in the preferred alternative, we believe there is more the BLM can do to ensure that its lands continue to support healthy fish and wildlife populations and provide world-class recreational opportunities. To
6 begin with, we believe the BLM should close all of the surface lands and federal mineral estate in the planning area to mining, oil and gas development, and sand and gravel extraction. In particular, we feel very strongly that sand and gravel extraction should not be allowed in the active river channel, as would be permitted under the preferred alternative. Such activity would alter the Snake River's form and function, thus adversely impacting riparian vegetation and fish

and wildlife. If sand and gravel extraction is absolutely necessary to protect public infrastructure (e.g. bridges and levees), the RMP could make that exception.

Livestock Grazing

We also believe the preferred alternative does not go far enough to ensure that excessive livestock grazing does not degrade soils, vegetation, and other critical components of healthy
7 fish and wildlife habitat. Rather than allowing existing livestock grazing to continue at current levels, we recommend that grazing be reduced or eliminated on allotments where overgrazing has been documented to be a chronic problem. According to the DEIS, two out of the four current grazing allotments in the planning area – the Walton allotment and one of the Porter Estate allotments – have failed standard #4 of the BLM's Standards of Healthy Rangelands and Guidelines for Livestock Grazing Management due to heavy grazing use and damage to the native shrub community. At the very least, the BLM needs to develop grazing management plans
8 for all of its existing grazing allotments. We concur with the recommendations in the preferred alternative that all parcels currently not leased for grazing should be closed to future applications, and existing grazing leases should be retired if and when the lessee's adjacent property is converted to uses other than grazing.

Off-Highway Vehicle Use

9 We concur with the preferred alternative's management objectives for OHV use – that it should be restricted to existing designated roads and trails – except where there are significant conflicts with non-motorized recreation. We share the BLM's concern that unauthorized trails are a growing problem. We therefore recommend that problem areas be clearly identified and targeted for vegetative restoration. We also concur with the management objective in the preferred alternative that would prohibit over-the-snow vehicles in the planning area.

Fish and Wildlife

We concur with most of the management objectives in the preferred alternative pertaining to the
10 protection of fish and wildlife. However, in order to optimize conditions for fish and wildlife, we believe that all surface lands and federal mineral estate in the planning area should be withdrawn from mining, oil and gas development, and extraction of salable minerals. We furthermore
11 12 believe that grazing impacts need to be reduced, OHV use should be limited to existing roads
13 and trails, and noxious weed control should exclude chemical treatment, especially along the Snake River, adjacent wetlands, and tributary streams. We also believe that the development of a
14 Recreation Area Management Plan could reduce or eliminate recreational activities that harm sensitive resources (i.e. nesting bald eagles).

16

LAND USE OR RESOURCE	GYC ALTERNATIVE
Land Ownership	Parcels should remain in BLM ownership. Any gerrymandering lands that are transferred to private ownership would be required to have a conservation easement placed on them prior to the transfer.
Mineral Withdrawals	A long-term protective withdrawal would be pursued for all public lands and federal mineral estate in the planning area to prohibit the staking and development of mining claims.
Oil and Gas	The federal mineral estate throughout the entire planning area would be closed to leasing consideration for oil and gas.
Other Leasable Minerals	Public lands and federal mineral estate would be closed to leasing consideration for phosphate, coal, sodium, and other leasable minerals.
Salable Minerals (Sand and Gravel)	The extraction of sand and gravel would be prohibited on public lands and federal mineral estate throughout the planning area.
Livestock Grazing 7	Grazing Management Plans would be developed on current grazing allotments. All parcels not currently leased for livestock grazing would be closed to future applications.
Livestock Grazing, continued 7	Livestock grazing would be reduced or eliminated on allotments that have not met the BLM's Standards of Healthy Rangelands and Guidelines for Livestock Grazing.
Noxious Weeds	Control of noxious weeds may include biological, mechanical, or manual methods. Herbicides would not be permitted in the planning area.
Off-Highway Vehicle Management 12	Motorized use would be limited to existing designated roads and trails. Where OHV use has been shown to have caused resource damage, these roads and trails will be closed to OHVs. Over-the-snow vehicles would be prohibited.
Fisheries	Projects that maintain or improve fisheries habitat as much as possible in a livestock system would be considered. Projects that adversely affect fisheries would be prohibited.

16

Recreation

15 As a rule, we strongly support the public's right to recreate along the Snake River, so long as it does not degrade the riparian corridor and the fish and wildlife that reside there. Apparently, however, recreational use along the Snake River between Moose and Wilson is already quite high and is likely to increase over time. It is for this reason that we urge the BLM to work with the local river recreation community to develop a Recreation Area Management Plan (RAMP). This plan could address such issues as overcrowding, day-use (e.g. picnicking), human waste disposal, and overnight camping.

Summary

In conclusion, we support the BLM's general direction in the draft Snake River RMP – which is to place a high priority on preserving fish and wildlife, low-impact recreation, and visual resources, and to prohibit activities such as mining, oil and gas development, and expanded grazing and OHV use that threaten to degrade those resources. However, we feel very strongly that these surface lands and accompanying federal mineral estate should stay in BLM ownership and not be transferred to a non-governmental organization or another federal agency. As stated earlier, transferring these lands to another federal agency does not resolve the issue of how to effectively manage scattered parcels of public land, and selling them to a local land trust, while certainly not the worst option, does not address the need to manage recreational use so it does not damage ecological and visual resources. It is for this reason that we endorse Alternative C – BLM Management for Preservation, with the few changes we suggested. Again, we appreciate the opportunity to comment on this important planning process. Please do not hesitate to call me at (406) 556-2823 if you have any questions regarding our comments.

Sincerely,

Scott Bosse
Rivers Conservation Coordinator

16

Wildlife	Where appropriate, measures to protect eagles and other wildlife habitats would include seasonal restrictions on recreation and other disruptive activities.
Levees	Levees that are no longer needed would be removed and the adjacent floodplain habitat restored. Existing levees would be planted with native vegetation.
Visual Resource Management	Any members of public lands would require, where appropriate, the use of conservation easements to prohibit development and preserve scenic values. Any surface disturbing actions would be analyzed for impacts to visual values.
Public Rights-of-Way 17	Rights-of-way for public recreation would be pursued if necessary. No additional rights-of-way would be granted to private interests seeking to cross public lands.
Camping	Development of low-impact campgrounds could be considered.
Special Recreation Management Area	Public lands along the Snake and Gros Ventre rivers would be designated a Special Recreation Management Area to facilitate management of recreational activities such as floating, fishing, hiking, and nonmotorized recreation activities.
Recreation Area Management Plan	A Recreation Area Management Plan would be prepared in order to provide for the management of public recreational use and the provision of services needed to minimize public health and safety, while protecting natural resources.
Special Project Area	The planning area would be designated a Special Project Area in order to allow federal Land and Water Conservation Fund purchases.

16

17

"Jan Monchilovich" <jamesyoung@hotmail.com>
04/10/03 08:15 AM
Please respond to jamo

To: pinedale_wyoming@blm.gov
cc:
Subject: 1073 Acres of Land Along Snake River

1 Please do not sell the 1073 acres of land along the Snake River for private access. Please use the public access option for this acreage. We need to protect the Snake River and keep it in as pristine a state as possible for all to enjoy.

Thanks,

Jan Monchilovich | P.O. Box 2092 | Jackson, WY 83001

18

2

the document (page 35) where it is stated, "The wildlife resources are dependent on a functioning environment, which provides all of the elements for survival in the proper balance and the riparian system is considered the most valuable." A further example of the importance of these habitats is the information (page 81) that discloses from 1982-88, 6 bald eagle pairs located on the Snake River between Moose and the South Park bridge produced 50 young, or 41 percent of the total production in the Snake River corridor. These number alone demonstrate importance of these habitats to wildlife.

1 The Institute does not agree that the Preferred Alternative is the best choice for future management of these lands. The Preferred Alternative proposes to transfer these lands to another public land management agency or to private non-profit land preservation entities within the next 15 years. The main reason we do not support this alternative is that the proposed RMP does not identify any specific agencies or organizations for this transfer. Given the nature of the lands, the management challenges, and the high dollar value it seems unlikely another public agency will be forthcoming. It is possible that a non-profit organization might be able to assume ownership, but the Institute has long argued that the public domain lands should remain in public ownership.

The threat posed to all open lands in the Jackson Hole area, from home development and gravel development, fully justifies keeping these lands in public ownership and protected from surface disturbances. Consequently, we suggest that the best alternative would be either Alternative E or Alternative C.

2 We prefer alternative E because of its provisions to limit options for disposal or exchange of the public land parcels. Recreation would be managed through a fee permit system for commercial outfitters and mineral extraction would be limited in favor of protecting wildlife habitats, watersheds, and the quality of the recreational experience. Livestock grazing would be maintained in areas where it is currently occurring, with elimination of fall grazing and the provision that grazing leases would be lost if the leaseholder's adjacent private lands were converted to a use other than grazing. This should help maintain more of the "rural" landscape as well as protect valuable wildlife habitats.

3 Alternative C is also workable and is characterized as the resource protection alternative. Access by motorized vehicles would be limited as would level of river floating. In cases where lands might be removed from public ownership and use, they would be protected from development through the use of conservation easements. This alternative would also close all federal mineral estate in the planning area to mineral extraction. Our only concern is the devolution of public lands is possible in this alternative.

Primarily because of the uncertainty of another public land management agency stepping forward to receive these lands, we urge the Bureau to strongly consider changing their preferred alternative to either Alternative C or Alternative B. The extreme threat to open spaces and wildlife habitats in the Jackson Hole area requires that all existing public lands be retained in public ownership and managed under multiple use policies.

18

Wildlife Management Institute

Leo H. Carpenter, Field Representative
4633 Cheney Drive • Fort Collins, Colorado 80526
Phone (970) 221-0009 • Fax (970) 204-0788

ROLLIN D. SPARROWE
President

RICHARD E. McCABE
Vice President

RECEIVED
APR 17 2003
PINEDALE FIELD OFFICE

April 14, 2003

Snake River RMP Team Leader
Bureau of Land Management
Pinedale Field Office
P.O. Box 768
Pinedale, WY 82941

Dear Team Leader:

I am the Southwest Field Representative for the Wildlife Management Institute. The Institute is a private, nonprofit, scientific and educational organization founded in 1911 and dedicated to the restoration, conservation, and sound management of natural resources, especially wildlife in North America. Following are my comments on the Draft EIS on the proposed Snake River Resource Management Plan.

First, it is good that the Bureau is updating this plan. It is important that land use plans be current and address pressing issues like land development, special management designations, resource accessibility, and special status species management. It is also necessary that RMPs be based on the latest federal laws, regulations, standards, guidelines, and policies.

It is recognized that the Snake River planning area is somewhat unique among Bureau lands. The isolated and relatively small public parcels pose special management challenges and opportunities. However, these lands are valuable parts of the public domain and should be retained and managed under public ownership.

This plan presents a wide choice of alternatives to address the planning issues and the reader can easily determine basic characteristics of each alternative. The planning team is to be acknowledged for these efforts.

The location and position of these lands along the Snake River in the Jackson Hole area dictate that these properties are very valuable for many uses. Since most of these parcels are riparian lands, they are important to a wild variety of important wildlife species. This is exemplified in

18

3

Thanks for the opportunity for comment. Please continue to inform us of future decisions on the Snake River Management Plan.

Sincerely,

Leo H. Carpenter

Washington, DC Office: 1101 14th Street, NW • Suite 801 • Washington, DC 20005 • Phone (202) 371-1808 • FAX (202) 408-8896

19

"Hawkes, John" <John.Hawkes@southwestwyo.com>

To: "pinedale_wymail@blm.gov" <pinedale_wymail@blm.gov>
cc:
Subject: BLM lands - disposal

04/21/03 11:28 AM

Dear BLM,
My comments regarding the disposal of Lands along the Snake river follow:

I am a long time river user - 20 years- for fishing, scenic floating, and whitewater. I consider the Snake to be a very important part of Jackson Hole. It stunds me as odd that I was not aware of all the BLM lands and now that I see a map of it I realize that some of it is so useless for boat ramps and access, but much of it is in odd parcels, in river bottom (cobblestone), unproductive land, or encompassed by other property with no reasonable public use or access.

1 I would encourage you to avoid taking a blanket approach such as dumping the acreage totally to the forest svc. or other entity. What makes sense is to make the best use of it. In some cases this may mean turning parcels with important river access points over to the county. parcels abutting forest service could go to them and parcels with little public value could be sold by competitive bid to adjacent land owners. There are some odd parcels with strange shapes that seem to have marginal value and largely encompassed by private lands. These could be sold for appraised value to that encompassing land owner. The money from these sales could be placed into a perpetual trust with interest supporting (in part) the BLM's many other needs.

While this varied approach takes a little more time, the revenues collected and knowledge that it was done right for each parcel more than justify the time involved.

John G. Hawkes
P.O. Box 3543
Jackson, WY.
83001

21

April 16, 2003

1 Snake River RMP Team Leader:
I hope it's not too late but some months from the public on the 1,073 acres along the Snake River (I live in R.I. after living 27 yrs in Jackson - and receive the newspaper very late)
I very strongly believe this land needs to stay in public ownership with public access to the Snake. Land is so precious, don't let this acreage (for the public) go to commercial use.

Sincerely,
Marjorie S Hunt
Marjorie S Hunt

RECEIVED
APR 28 2003
PINEDALE RESOURCE AREA OFFICE

20

SURVEYOR SCHERBEL, LTD.
PROFESSIONAL LAND SURVEYORS

President
PAUL R. SCHERBEL
Professional Land Surveyor
Wyoming Registration No. 154
Utah Registration No. 4170
Idaho Registration No. 5936
Nevada Registration No. 8000

SCOTT A. SCHERBEL
Professional Land Surveyor
Wyoming Registration No. 3889
Idaho Registration No. 9026
Utah Registration No. 171311

HARLOWE A. SCHERBEL
Professional Land Surveyor
Wyoming Registration No. 5368

ADDRESS
BIG PINEY OFFICE
Box 1296, 181 Main Street
Big Piney-Marbleton, Wyoming 83113

JACKSON OFFICE
Box 535, 40 Mercill Avenue
Jackson, Wyoming 83001

Subject: WY Office is Main Office
Lander/Riverton/Cheyenne Office
Montpelier, ID Office is Main Office

TELEPHONE
307-276-3347
307-276-3348 (Office)
307-276-3347 (Office)

307-733-5030
307-733-5030 (Fax)
307-733-5030 (Office)

307-332-5892 (Cell)
208-176-5030 (Cell)
208-847-1954 (Cell)

Est. 1951
CONSULTATION
Boundary Matters
Irrigation and Water Rights
Civil Engineering
Storage/Wetlands

Associate
KEVIN L. BLANCH
Professional Engineer
Wyoming Registration No. 7266

Donna Christian
Office Manager

18 April 2003

Snake River RMP Team Leader
Pinedale Field Office
Box 768
Pinedale, Wyoming 82941

Re: Snake River RMP

Dear Sir:

Responding to the Draft Environmental Impact Statement for the Snake River Resource Management Plan, the following is offered.

1 It would seem that Alternate E would be the best choice for these lands as there are ample public land management agencies in Teton County that could handle this assignment including the U. S. Forest Service, Fish and Wildlife Service, Wyoming Game and Fish Department, County of Teton, Town of Jackson, National Park Service, ad. inf.

2 There is no reason for the Bureau of Land Management to be involved in managing these lands with the added expense of another Federal Agency.

Very sincerely yours,

SURVEYOR SCHERBEL, LTD.

Paul R. Scherbel
President

PRS:ny

Professional Land Surveyors of Wyoming
American Congress on Surveying and Mapping

Utah Consulted Land Surveyors
Idaho Professional Land Surveyors

22

Kellie Roadifer
Snake River RMP Team Leader
BLM
Pinedale Field Office
PO Box 768
Pinedale, WY 82941

April 23, 2003

Dear Kellie Roadifer,

Thank you for the opportunity to comment on the DEIS for theSnake River RMP. I value the habitat that the Snake River provides for fish and wildlife. I value the view of the river where it is still unobstructed by development. This river is at risk of development.

1 Please do your best to maintain the lands along the river in public ownership. Instead of disposing of this land and therefore allow it to be developed, because we both know the development pressures are huge, try to consolidate the land under the stewardship of the BLM. You could do this by decreing this special area a Special Projects Area.

Thank you for this opportunity to comment. The future of the Snake River flood plain is in your hands.

Sincerely, Georgie W. Stanley

Georgie Stanley

Georgie Stanley
1029 S. 200 W.
Victor ID 83455

RECEIVED
APR 28 2003
PINEDALE RESOURCE AREA OFFICE

23

P.O. Box 10002
Jackson, WY 83002
May 2, 2003

Snake River RMP Leader
Pinedale Field Office: BLM
P.O. Box 768
Pinedale, WY 82941

As the BLM decides exactly how to deal lands along the Snake River in Jackson Hole, I hope that the need to maintain a semblance of the natural state of the area will be given top priority. As you know, there have been innumerable intrusions, threats and outright damages done in that important and sensitive lands corridor through the much dryer valley. I agree with many people who express concern about protecting animals that live in the riparian area, but the most effective way to do that is to concentrate on maintaining habitat. This area can then serve as a small but safe retreat for animals that encounter constant change through development that is occurring in so much of Teton County.

1 Protecting habitat here will serve the best interests of the local area and the entire State, since wildlife viewing and outdoor recreation can provide business for local residents that is sustainable indefinitely, and business that will preserve natural areas for generations of Americans in the decades and even centuries ahead. This area is unique in offering that opportunity, and once any "improvements" are implemented, part of the opportunity for saving these qualities will vanish.

Thank you for allowing members of the public to send you our comments.

Sincerely,

Richard R. Kleno
Richard.Kleno@UC.edu

RECEIVED MAY 5 2003

24

SNAKE RIVER RANCH, INC.
5700 N. Snake River Ranch Road
Wilson, Wyoming 83014-9680
(307) 733-2864
Fax (307) 734-9047

VIA EMAIL

Snake River RMP Team Leader
Pinedale Field Office
P.O. Box 768
Pinedale, WY 82941

Re: Comments on draft EIS for the Snake River Resource Management Plan

1 In the preferred alternative, it is proposed that livestock grazing end by August 31st of each year. This cut-off date may be useful to protect riparian shrubs from fall browsing. However, it could limit the ability to use cattle to promote grasses, especially in competition with exotic weeds such as spotted knapweed.

As you know, we graze our BLM allotment in conjunction with our own riparian lands. We try to time our grazing to avoid browsing of woody plants and to promote grass so that it can compete with exotic weeds. Since the rainfall and water levels vary each year and are critical to grazing in the river bottom areas, each year our situation is different. But often, by resting the pasture from mid July through mid September, we allow grasses to set seed. Then by grazing in September and October the cattle help incorporate the grass seed into the seedbed. We have found that this has allowed us to maintain native grasses, reduce spotted knapweed invasion, and still maintain woody riparian vegetation.

Instead of establishing a fixed grazing cut-off date, cattle grazing standards should be established that relate to the maintenance of woody vegetation and/or the reduction of exotic weeds. This flexibility should result in better land management.

Sincerely,
Bill Rosar

25

P. O. Box 1288
Wilson, WY 83014
May 4, 2003

Ms. Kellie Roedifer
Snake River RMP Team Leader
U.S. Bureau of Land Management
Pinedale Office
P.O. Box 768
Pinedale, WY 82941

RECEIVED MAY 7 2003

Dear Ms. Roedifer:

As a resident of Wilson, Wyoming, I have a first-hand appreciation of the fish and wildlife habitat in the Snake River Resource Area and want to urge you to manage these lands primarily for their protection.

1 My principal comment on the Draft Environmental Impact Statement for the Snake River Resource Management Plan is to maintain these lands in public ownership, perhaps by designating a Special Project Area, so as to avoid any damaging activities, such as energy development, mining or sand and gravel operations, off-highway vehicle use or livestock grazing in riparian areas. You should try to combine all these parcels into contiguous protected corridors along the Snake River, perhaps in collaboration with the local land trusts, which have already protected several parcels of private land.

Thank you,
Stephen Ostrich

26

Patty Ewing
PO Box 429
Jackson, WY 83001

May 3, 2003

Snake River RMP Team Leader
Pinedale Field Office
PO Box 768
Pinedale, WY 82941

Dear Sir:

1 This letter is to support the BLM's continued public ownership of the 1075 riparian acres along the Snake River, and the BLM's proposal that it be administered for public access.

In reviewing the Comparison of Alternatives proposed in the Environmental Impact Statement for the Snake River Resource Management Plan, I support the **Preferred** Alternative with the following emphasis or exceptions:

Emphasis: The importance of the development of the South Park Bridge Access
Minerals Management - No mineral activities allowed.

2 **Exceptions:** Salable minerals - Alternative C
3 Off Highway Vehicle Management
Close to all motorized vehicles the following:
Levee road at the Walton Parcel
Levee road west of the Snake River & South of Wilson Bridge
Vehicle use (Alternative C) for lower maintenance and permitted vehicles on case by case basis.
Over the snow motorized vehicles (Alternative C) would be prohibited.
4 Landownership Adjustments: Parcels remain in public ownership. NO SALE of public lands (Alternative C)
Management of parcels may be retained by BLM or other public agencies.
5 Livestock Grazing management objective (Alternative C) otherwise the preferred alternative for all other actions.
6 Public access: a required public access fee program would be established (Alternative B)
7 Parcels would remain closed to camping (Alternative A)
8 Vegetation Management: Maintain habitat as in Alternative C
Control Noxious weeds as in Alternative C

In several instances, the Preferred Alternative refers to the disposal or transfer of the public parcels.
9 I oppose vehemently the sale of ANY PUBLIC LANDS! Perhaps the management of these parcels could be the Teton County Commissioners; a non-profit organization dedicated to the enhancement of the Snake River, such as: The Snake River Fund, Trout Unlimited, Ducks Unlimited, or a board comprised of representatives of all of these.

Sincerely,
Patty Ewing

RECEIVED MAY 5 2003

27

State of Wyoming
TETON COUNTY
www.tetonwyo.org

Commissioners

Bill Paddleford
Andy Schwartz
Jim Epsicho
John Corney
Larry Jorgensen

Director of Administrative Services

Jan Freitfield

May 8, 2003

Ms. Kellie M. Roadifer
Team Leader / Draft Environmental Impact Statement for the Snake River Resource Management Plan
Bureau of Land Management
P.O. Box 768
Pinedale, WY 82941-0768

RE: Draft Environmental Impact Statement for the Snake River Resource Management Plan Comments

Dear Ms. Roadifer,

We are in receipt of the above referenced document dated January 2003. After reviewing the Draft EIS, we support the Preferred Alternative and find that this alternative generally addresses the need to preserve public access and recreational use while supporting open space preservation and protection of wildlife values. Assuming this alternative is approved, there are some minor concerns that we trust can be accommodated once the Management Plan is adopted and implemented by your agency. These include:

1 • Recognition that there are competing management objectives within the criterion. For example, allowing public access for recreational use on certain parcels may compromise wildlife habitat values.

2 • The need to reserve, to Teton County, the right for staging areas and / or gravel stockpiling associated with the Snake River Restoration Project if parcels are conveyed to entities other than Teton County.

3 • If the BLM transfers land to Teton County with an approved Project Plan, it is important to allow sufficient time for the funding and construction of proposed Project Plan improvements on the subject parcel(s) subsequent to the ownership transfer.

P.O. Box 3594, Jackson, WY 83001 • (307) 733-8094 • Fax (307) 733-1651 • Email:

27

Page 2
Ms. Kellie M. Roadifer
May 8, 2003

On behalf of the citizens of Teton County, we appreciate your efforts in preparing this important document.

Sincerely,

William P. Paddleford
Chairman / Teton County Board of County Commissioners

Cc: Board of County Commissioners
Craig Jackson / County Engineer
Bill Collins / County Planning Director
Don Barney / County Road and Lowes Superintendent
Steve Foster / Parks and Recreation Department Director

28

PHIBBS LAW OFFICE PC.
330 E. Snow King Avenue
Jackson, Wyoming 83001
(307) 733-5860
Fax: 307-733-5819

HOARD C. PHIBBS IV

Mailing Address:
P.O. Box 1982
Jackson, Wyoming 83001

May 8, 2003

Via Email: pinedale_mymail@blm.gov *To Be Followed by U.S. Mail*
and
Via Telefax: 307-367-5329

To: Snake River RMP Team Leader
Pinedale Field Office
P.O. Box 768
Pinedale, WY 82941

From: Hank Phibbs

Re: Draft Environmental Impact Statement for the Snake River Resource Management

Dear People:

I am sending you this letter on behalf of a number of landowners along the Snake River, in Teton County. On their behalf I would like to correct some misinformation which is set forth in the draft environmental impact statement regarding the public's right to access riparian lands along the Snake River.

1 In chapter 1, on page 1 of the DEIS, in the second paragraph, you make a number of incorrect statements about land ownership along the Snake River. First, the lands located between the surveyed meander lines which define the Snake River are not "omitted lands". These lands belong to the owner of the adjacent uplands unless and until a federal court, in a final judgment, has found and determined that the original surveys were in error. This means that almost all of the riparian lands which are adjacent to patented uplands along the Snake River have always been and are still in private ownership. In this paragraph you state that "for most of the parcels that did go into private ownership..." This language is fundamentally incorrect. None of the parcels were "[illegible] private ownership", as they were always private from the beginning and that private ownership was not affected by any action taken by the federal gov[illegible]

Snake River RMP Team Leader
Pinedale Field Office
May 8, 2003
Page 2 of 3

even when the owners of these lands granted a recreational easement as part of the settlement with the federal court.

2 In the last sentence of this paragraph you state that "for instance on the Snake River through the planning area, recreationists can anchor boats, wade, hike, picnic and fish on the river as it crosses private lands." This sentence clearly represents that the public has recreational rights of some kind on all of the riparian lands along the Snake River. For some of the riparian lands along the Snake River, the government never made any claim at all and these lands remain in private ownership not subject to any use rights. For other public lands, the government abandoned to claim and those lands also remain in private ownership not subject to any public recreational use rights. Please correct this fundamentally inaccurate language in the DEIS, everywhere it is present in the DEIS, so that there is not a false impression given to the public that they have a right to use all of the lands located between the meander lines of the Snake River for recreational purposes. This is definitely not true. Trespass on these lands is a growing problem for private landowners of these properties. The BLM should not make false statements to the public which may either cause and/or exacerbate these trespass problems.

3 Finally, I believe the parcel you identify as parcel 23 on map 8 and describe as a BLM parcel is actually a parcel which is privately owned by Robert J. and Mary Anne MacLean. I request that the ownership of the northern of the two parcels you have identified as parcel 23 be checked and corrected and deleted from the designation of public ownership when it is private status is confirmed.

Thank you for the opportunity to comment on this matter.

Very truly yours,

Henry C. Phibbs II

HCP/hm

29

PHIBBS LAW OFFICE P.C.
350 E. Snow King Avenue
Jackson, Wyoming 83001
(307) 733-0009
Fax: 307-733-5019

HENRY C. PHIBBS II

Mailing Address:
P.O. Box 1092
Jackson, Wyoming 83001

May 8, 2003

Via Email: pinedale_wyoma@blm.gov *To Be Followed by U.S. Mail*
and
Via Telefax: 307-367-5329

To: Snake River RMP Team Leader
Pinedale Field Office
P.O. Box 768
Pinedale, WY 82941

From: Hank Phibbs

Dear People:

I am sending you this letter on behalf of Walton Ranch Company to provide comment and correction with respect to a draft environmental impact statement your office has issued regarding the Snake River planning area and the legal status of certain property located adjacent to the west boundary of the Walton Ranch in Teton County, which the Walton Ranch has occupied and leased pursuant to the final judgment of the United States District Court for the District of Wyoming.

The property I refer to is identified as parcel 9 in your DEIS. The final judgment of the U.S. District Court of the District of Wyoming, which was stipulated to by the United States of America, gives the Walton Ranch Company the "right" as long as it is eligible under the laws and rules of the United States, to lease this parcel for grazing, agricultural or other authorized uses consistent with the maintenance of the property in its existing condition on the date of stipulation and entry of judgment. The right of the Walton Ranch Company to lease parcel 9 is subject to a determination by the United States in any legally mandated planning procedure that parcel 9 should be maintained in its existing condition as of the date of the stipulation and/or utilized for agricultural purposes. If it was determined in any legally mandated procedure that any part of parcel 9 should not be maintained in its existing condition on the date of the stipulation and/or utilized for agricultural purposes, the Walton Ranch Company has the right to lease the remainder of parcel 9.

29

The Walton Ranch Company has utilized parcel 9 for the grazing of ranch bulls for a month in the spring and a month in the fall. Parcel 9 has historically been divided into a north portion and a south portion.

1 There has never been any allegation whatsoever by the Bureau of Land Management, which has been communicated to Walton Ranch Company, that the north portion of parcel 9 did not meet the standards for healthy public range lands. The DEIS, on page 54, incorrectly asserts that the Walton allotment failed to meet standard number 4. The north portion of the Walton allotment has never been alleged to be out of compliance with all of the standards. The south portion of the Walton allotment has been alleged not to meet standard number 4, pertaining to alleged adverse impact on a particular shrub. Although the Walton Ranch Company has requested competent evidence from the Bureau of Land Management that the impact on the shrub in question was caused by the presence of the ranch bulls for one month in the fall, rather than the presence of browsing wildlife such as deer and moose, the BLM has failed to produce any such information or evidence whatsoever and its claim of noncompliance is without evidence or support in terms of causation. The Walton Ranch Company requests that the final DEIS reflect these facts.

2 The DEIS, on page 210, asserts that parcel 9, which the Walton Ranch Company has a right to lease by final judgment of the United States District Court, did not meet standard number 3 of the Healthy Public Range Land Standards. There has never been an allegation made at any time that any portion of parcel 9 failed to meet standard number 3 of the Healthy Range Land Standards.

3 The preferred alternative noted on page 26 of the DEIS proposes to eliminate fall grazing on parcels administered by the BLM. This will include parcel 9, which is leased by the Walton Ranch Company. There is no justification whatsoever given for this "preferred" alternative in terms of the north portion of the Walton allotment, and, as noted, there is no competent evidence to support the claim of the Pinedale office of the BLM that the fall grazing of the Walton Ranch bulls on the southern portion of this allotment for one month in the fall has adversely affected any shrub community.

29

4 The Walton Ranch Company requests that the BLM take the necessary actions to correct the misinformation set forth in the DEIS, and to conform the preferred alternative to the mandate and directive of the final judgment of the United States District Court. The preferred alternative for parcel 9 is and should be continued historic use of all of parcel 9 for both spring and fall grazing by the Walton Ranch Company.

Thank you very much for the opportunity to comment.

Very truly yours,

Henry C. Phibbs II

HCPhbs
cc: WRC

30

United States Department of the Interior

FISH AND WILDLIFE SERVICE
National Elk Refuge
P.O. Box 510
Jackson, Wyoming 83001

May 8, 2003

Snake River RMP Team Leader
Pinedale Field Office
P.O. Box 768
Pinedale, Wyoming 82941

To Whom it May Concern:

We have reviewed the Draft Snake River RMP EIS and have the following comments:

1 1. The lands covered under this document have enormous recreational, wildlife, scenic and cultural values and must be retained in some type of public ownership. Unfortunately, the Fish and Wildlife Service would be unwilling to assume management responsibilities for these lands because of severe ongoing funding and staffing shortages.

2 2. The Fish and Wildlife Service requests that Federal minerals under the surface of the National Elk Refuge be permanently withdrawn from mineral entry. Mineral extraction of just about any type would conflict with the purposes for which the refuge was established.

Sincerely,

Barry Reiswig
Refuge Manager

31

Brian Ramlinger
PO Box 6376
Jackson, WY 83002

May 13, 2003

Snake River RMP Team Leader
PO Box 768
Pinedale, WY 82941

RE: DRAFT EIS for the Snake River RMP

Dear Team Leader,

I have reviewed the BLM's DRAFT EIS for the Snake River RMP. I am a year resident of Teton County and an avid user of the river and BLM Land here in Jackson Hole. I have many comments, but would like to concentrate on one. The Snake River Corridor provides recreational opportunities, wildlife habitat, and public benefit that cannot be matched. It is **my opinion that the public lands should stay in public ownership and free of structures.**

1

I understand the Pinedale Office management and budget roadblocks, but these are only challenges to be over come. Do not forget the BLM Mission Statement:

> It is the mission of the BLM to sustain the health, diversity, and productivity of the **public lands for the use and enjoyment of present and future generations.**

2 Gravel is a valuable commodity in Teton County. Mine it and sell it. Use the money for management of the Jackson Hole BLM lands and to improve the health of the Snake River. There are opportunities to partner with local agencies and non-profit organizations to address management issues. It would be a tragedy to see the adjacent landowners acquire more land on top of the many acres they already have. Public access, public use, and public ownership should not be compromised in the Snake River RMP.

3

Sincerely,

Brian Ramlinger

33

PHIBBS LAW OFFICE P.C.
330 E. Snow King Avenue
Jackson, Wyoming 83001
(307) 733-5004
Fax: 307-733-5019

HENRY C. PHIBBS II

Mailing Address:
P.O. Box 1002
Jackson, Wyoming 83001

May 14, 2003

Via Email: pinedale_mymail@blm.gov *To Be Followed by U.S. Mail*
and
Via Telefax: 307-367-5329

To: Snake River RMP Team Leader
Pinedale Field Office
P.O. Box 768
Pinedale, WY 82941

From: Hank Phibbs

Re: Errors in Ownership Designation in Draft Environmental Impact Statement for Snake River Resource Management Plan

Dear People:

I am writing to you once again regarding an error in ownership designations set forth in your Draft Environmental Impact Statement for Snake River Resource Management Plan. This letter is sent on behalf of Bob and Marna MacLean, who own real property along the Snake River in Teton County, Wyoming.

1 May 7 in you DEIS designates certain property which appears to be identified as parcel 22. Although the labeling is not clear, you have identified as BLM parcels which appear to be labeled as 22, property located in Sections 14 and 15. All of this property is owned by Mr. and Mrs. MacLean and the BLM has no right, title or interest in and to this property, except for a recreational easement over those portions of the property line between the banks of the Snake River.

Please correct this misinformation in the final impact statement and take the time to confirm the ownership of the property in question. The incorrect designation of this ownership as public creates significant potential problems for private landowners.

Very truly yours,

Henry C. Phibbs II

HCPlbm
cc: MacLeans

RECEIVED
MAY 15 2003
PINEDALE FIELD OFFICE

32

"Rosanne F. Coppola" <rosanne@elkhillsrancheo.com>
04/04/03 11:02 AM

To: rpinedale_mymail@blm.gov
cc:
Subject: BLM Land

Gentlemen:

1 With reference to your proposal to "dispose" of various BLM land in Wyoming, we prefer to leave this land in the hands of the government, except for specific parcels, depending upon proposed use. As an

2 example, BLM owns a parcel of land connected to the land on which the Jackson Hole Gun Club sits. It would be our request that this parcel be transferred over to the County for actual use by the Gun club for expansion of its sporting clays facility. This facility is a much used facility by locals as well as visitors, however, it is very limited in scope. With this extra land, it would be possible to expand the sporting clays from a five stand to a full course.

Thank you for your attention to this request. Regards, Hugh and Rosanne Coppola

34

PHIBBS LAW OFFICE P.C.
330 E. Snow King Avenue
Jackson, Wyoming 83001
(307) 733-5004
Fax: 307-733-5019

HENRY C. PHIBBS II

Mailing Address:
P.O. Box 1002
Jackson, Wyoming 83001

May 13, 2003

Via Telefax: 307-367-5329 *To Be Followed by U.S. Mail*

To: Snake River RMP Team Leader
Pinedale Field Office
P.O. Box 768
Pinedale, WY 82941

From: Hank Phibbs

Re: Incorrect Identification of Property Ownership in Draft Environmental Impact Statement for the Snake River Resource Management Plan

Dear People:

I am sending you this letter on behalf of Circle L Partners, which owns property on the Snake River in Teton County, Wyoming.

I am sending you this letter because your Draft Environmental Impact Statement for the Snake River Resource Management Plan ("DEIS") incorrectly identified certain property which belongs to Circle L Partners as being the property of the Bureau of Land Management.

1 On map 7 in the DEIS, you have marked a parcel you identify as parcel 20 as being the property of the BLM. Both the upland and riparian portions of the property you have identified as BLM parcel 20 are owned by Circle L Partners.

The final judgment entered by the United States District Court for the District of Wyoming in Civil Action No. C 79-111K, which quiets title in this property in favor of the upland owner against the claim asserted by the United States, is recorded in Book 206, pages 1009-1051.

I have enclosed a copy of the deed conveying title to the property to Circle L Partners.

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MAY 15 2003
PINEDALE FIELD OFFICE

34

Snake River RMP Team Leader
Pinedale Field Office
May 13, 2003
Page 2 of 2

There is a recreational easement reserved in the judgment which allows limited recreational access to certain portions of this property which are located within and between the banks of the Snake River. There are no other public rights whatsoever in the property, and no public rights at all in the upland portion of this property.

Your identification of this property as publicly owned in the DEIS creates the potential for serious mischief and unequal problems for the landowner. Demand is hereby made that you correct this error when the final environmental impact statement is prepared, both in terms of the map and in the language of the final environmental impact statement.

My client regrets that you have created the potential for such serious problems as a result of this error which should not have been made since the record ownership of this property is not in doubt.

Very truly yours,

Henry C. Phibbs III

HCPhibs
cc: Circle L Partners

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WARRANTY DEED

DONALD H. ALBRECHT, a married man, of Teton County, Wyoming, Grantor, for and in consideration of Ten Dollars ($10.00) and other good and valuable consideration in hand paid, the receipt and sufficiency of which are hereby acknowledged, CONVEYS AND WARRANTS to CIRCLE L PARTNERS, a Wyoming general partnership composed of Earl D. Stein and George M. Lambert, whose mailing address is Circle L Outlines, Lambert Center, P.O. Box 1956, Lake Geneva, Wisconsin 53147, Grantee, the following described real property located in Teton County, State of Wyoming, hereby releasing and waiving all rights under and by virtue of the homestead exemption laws of the State, to-wit:

The real property described in Exhibit A attached hereto and made a part hereof.

Including and together with all improvements and appurtenances thereon and thereunto belonging, but subject to taxes, assessments, reservations, restrictions, easements, encumbrances, covenants, conditions, rights-of-way and exceptions of maps and record, if any; and,

Subject to the Reservation of Right to Grantor to grant limited recreational use licenses to third parties as described in Exhibit B attached hereto and made a part hereof.

Joanne H. Albrecht, wife of Donald H. Albrecht, joins in the execution of this Warranty Deed to release and convey any rights she may have in and to the above described property under the laws of the State of Wyoming.

DATED effective this 29 day of April, 1992.

Grantor's address:
Grantee's address:
Tax Statement address:
Tax Parcel Number:
Recorded at ___ o'clock ___ M., ___ Book ___ of Official Records, Page ___
Fee: $ ___
By ___
Deputy

Scott S. Albrecht, attorney-in-fact
for Donald H. Albrecht and
Joanne H. Albrecht

STATE OF WYOMING)
) ss.
COUNTY OF TETON)

The foregoing [illegible]

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DESCRIPTION OF
RIPARIAN PARCEL "D"
FOR DONALD ALBRECHT

TO WIT:

The riparian lands of the Snake River appurtenant to Lot 4 of Section 18, and Lot 2 of Section 19, T40N, R117W, 6th P.M., Teton County, Wyoming which are bounded as follows:

on the west by the meander line of the right bank of the Snake River;

on the north by the statutory prolongation of the north line of Unit 2, Five Meadows Final Filing, a subdivision of record in the Office of the Clerk of Teton County, Wyoming as Plat No. 218;

on the east by the Thread of the Snake River;

on the south by a line normal to the Thread of the Snake River from the northeast corner of said Lot 2;

ENCOMPASSING an area of 81 acres, more or less, said acreage varying as the Thread of the Snake River varies;

said Riparian Parcel "D" is shown on that "MAP OF SURVEY DONALD H. ALBRECHT MOOSE TO CREEK PARCELS" filed in said Office.

Jorgensen Engineering and Land Surveying, P.C.
March 19, 1992

Project No. 89005-00

C:\WP51\DCS\ALBRECH\LSAH1

EXHIBIT A

35

United States Department of the Interior
NATIONAL PARK SERVICE
GRAND TETON NATIONAL PARK
P.O. DRAWER 170
MOOSE, WYOMING 83012

IN REPLY REFER TO

L76 (GRTE)

MAY 14 1998

Snake River RMP Team Leader
Bureau of Land Management
Pinedale Field Office
P.O. Box 768
Pinedale, WY 82941

Dear Snake River RMP Team Leader:

Grand Teton National Park would like to submit the following formal comments on the Bureau of Land Management's Draft Environmental Impact Statement for the Snake River Management Plan.

Grand Teton National Park supports the Preferred Alternative allowing land disposition to a non-profit or government agency. We support this approach which conserves the land in its current status, protects public access to the river and benefits the recreating public by preserving these wind lands within this world renown riparian habitat. We encourage the BLM to support the partnership efforts with Teton County, Grand Teton National Park and non-profit organizations by implementing the preferred alternative through this innovative and cooperative plan.

If we can be of any assistance to your staff in this matter, please call me at 307-739-3410.

Thank you,

Stephen P. Martin
Superintendent

Snake River RMP Team Leader
Pinedale Field Office
P.O. Box 768
Pinedale, WY 82941

Fax: 307-367-5329

May 14, 2003

Dear BLM Planners,

1 I am concerned that certain BLM lands adjacent to the Snake River in my area will soon pass out of public ownership. I see only continued public ownership as our community's best opportunity to protect these BLM lands for both their natural resources and for public access. One concern is for those river users who have studied their maps and know where this public land is will become "locked out" if the lands are privatized.

2 The boat launching/docking areas at the Wilson and South Park Bridges do need a lot of help. The usage has so increased in this past decade, with little effective joint planning having taken place. Instead of the BLM opting out and "disposing" of these lands, why doesn't your agency form a partnership with Teton County, the Bridger-Teton National Forest, The Snake River Fund and other interested parties to sort this all out? Besides the launch/dock areas, how much in administrative costs are you talking about for managing these lands "as is"? I prefer keeping public lands in public hands.

Sincerely,

Page McNeill

Page McNeill
P.O. Box 283
Jackson, WY 83001

Comments regarding Snake River
Resource Management Plan DEIS dated January 2003

Summary Comment: The resource that threads together the BLM parcels is the Snake and Gros Ventre Rivers. Values related to these rivers are public recreation, riparian wildlife habitat, open space, and high quality scenery. These values are present to varying degrees on the present distribution of BLM parcels, but few parcels incorporate enough of these values to be determinative for management purposes. One other value present is real estate market value. Even if the land is restricted to protect public values, this value is probably still substantial and can be used to accomplish meaningful public resource objectives. Therefore, all management alternatives need to be supported by flexible land adjustment alternatives.

1 1. The total BLM land surface area should be adjusted to 1,061 acres, as parcel 3 was included in the total on Map 1, Appendix 4, page 209 states this parcel has been transferred to Grand Teton National Park.

2 2. Page 1, second paragraph, 10th line, Page 52 "Access" next to last paragraph, Page 62 "Recreation": "Some of these recreation easements on the river channel were granted to the United States." In these locations the draft EIS significantly overstates the extent of the recreational easements along the Snake River. First, there are significant areas of Snake River riparian lands that are still fully in private ownership where either the landowner won in the lawsuit or a lawsuit was never filed against the landowner. In these locations, the public has no access to islands or even the right to stand on the bed of the Snake River and fish. Where recreational easements were granted as part of various settlements, the recreational easements vary substantially. Also, in some cases the easements have metes and bounds descriptions while in other cases the location of the recreational easement depends on the location of the river. A further complication is the fact that the boundaries between landowners (either on one side of the river or landowners across the river from each other) move as the main channel of the Snake River moves. For example, two adjacent land owners on the west side of the Snake River would have a boundary that is perpendicular to the thread of the Snake River wherever it is from time to time. Therefore the boundary between these landowners continues to vary unless it has been established by private agreement. Therefore if one of these landowners has granted certain rights in a recreational easement and the other landowner has granted different rights, the boundary between these two different areas cannot be marked on the ground, since it varies from time to time. Due to all of these factors, the practical benefit to public recreation of these recreational easements is much less than it would at first appear. It would be helpful to clarify in the final EIS that these recreational easements vary significantly, only cover certain areas, and have boundaries that move as the river moves. On the other hand, there is a significant opportunity to increase the

Comments regarding Snake River
Resource Management Plan DEIS dated January 2003

May 13, 2003

Submitted by:

Bruce A. Bugbee
American Public Land Exchange Co., Inc.
125 Bank Street, Suite 610
Missoula, MT 59802
Phone: (406) 728-4176
Fax: (406) 721-9049
E-Mail: aple@apleco.com

potential for public recreation if these recreational easements could be standardized and their boundaries determined on the ground. But this will require further agreements with the private landowners.

3 3. Page 8, Alternative A: Consider expanding/clarifying that parcels could be transferred to other public agencies or entities for management as public open space, riparian wildlife habitat, recreation facilities, or parks. That is, lands might be traded for land interests serving other priority public purposes of open space, recreation and wildlife if the parcels are restricted by conservation easement and thereby preserve public values on the BLM parcels, as appropriate.

4 4. Pages 155, end of second paragraph: "...a layer bureaucracy would be added" suggests that ownership responsibilities would be inefficiently allocated. BLM's intent seems to allocate ownership to those entities most able to manage for specific public values. The assumption that this allocation would add another layer of bureaucracy is gratuitous.

5 5. Pages 154-158 "Cumulative Impacts" section: Generally, land adjustment choices among the alternatives are not distinctively defined. Land adjustment is a tool for implementing management policy. As such, flexibility should be maintained allowing the best ownership solution for the selected alternative. All of the alternatives share the ability to adjust ownership to different levels. The authority for land adjustments also requires public involvement and NEPA compliance on a case-by-case basis. Limiting adjustment options before specific opportunities can be evaluated seems unnecessarily restrictive. All alternatives should encourage outcomes that maximize public benefits for recreation, wildlife, open space and scenic values for the Jackson Hole Valley.

BAB:bjs

Paul Braun
Box 1085
Jackson, WY 83001
May 15, 2003
307 733-5173
pbraun@tetonwest.com

Snake River RMP Team Leader
Pinedale Field Office,
P. O. Box 768
Pinedale, WY 82941
FAX 307 367-5329
pinedale_wymail@blm.gov

Good morning,

After recently surfacing from a several year long riverbank/golf course development ordeal involving Teton County, the U. S. Forest Service, U. S. Fish and Wildlife Service, a federal court and many other organizations, I was hoping for a rest. Such is not to be as I learned recently of well orchestrated, fast moving plans involving a large portion of the upper Snake River and the 27 BLM sites between Moose and the South Park Bridge.

By way of introduction, as the editor of the *Jackson Hole Guide* during 1973-74, the fate of the "Snake River Omitted Lands" was a constant subject of conversation and newspaper copy. That coupled with then U. S. representative Teno Roncalio's gold mine leases on the Snake kept me very busy.

As the case eventually came to court and was dragged around and around, I had left the direct editorial management of the newspaper to become involved in taking float fishing trips. In fact, I can recall a number of early season, mosquito infested floats with BLM personnel and interesting botanists who spent the days using a Swedish designed drill to remove core samples from cottonwoods for aging. Tree sites on "islands" omitted from early surveys were the key to the government vs. landowner property cases.

Little did I realize, some 30 years later, that I would be writing to the BLM asking that they not dispose of the land niches that were ultimately decided with that bit botanical and scientific study presented to the courts.

Very simply stated, I believe the value of over 1,000 acres of precious riparian land along Wyoming's largest Blue Ribbon Trout Stream is more valuable to Teton County, the State of Wyoming, the Federal Government and a growing recreation oriented public than it is being given credit for.

Regardless of the five alternatives listed in the *Draft Environmental Impact Statement for the Snake River Resource Management Plan*, the BLM has made no secret that the physical distance from its closest office, complexity and expense of "managing" this dispersed property makes it a prime exchange target. Although this Draft EIS is the first attempt at managing this land that has been idle for dozens of years, I recognize it is now viewed as a burden.

1 As a frequent river user and small fly fishing float trip operator, I would welcome creative governmental management that could extend a brighter future to at least

Jackson Hole Conservation Alliance
Wyoming Outdoor Council

May 9, 2003

Kellie Roadifer
Snake River RMP Team Leader
U.S. Bureau of Land Management
Pinedale Field Office
P.O. Box 768
Pinedale, WY 82941

RE: Snake River Resource Management Plan

Dear Ms.Roadifer:

On behalf of the Jackson Hole Conservation Alliance and the Wyoming Outdoor Council, we would like to thank you for your thorough review and analysis of six alternatives for the Snake River Resource Management Plan. In particular, the Snake River Contingent Valuation Methodology study (CVM) was instrumental to the planning process to help determine the non-market values for resources and uses of the public land parcels in the Snake River planning area.

According to the DEIS for the Snake River RMP, Appendix 6 highlights the single theme dominating the results of the CVM: the public lands considered in the planning area represent a valuable resource that has a non-market component which greatly exceeds the private market value of the lands. This general conclusion is consistent with results presented in the executive summary:

Top Three Most Desirable Uses of the Lands along the Snake River:
- Fish and wildlife habitat, especially bald eagle nesting;
- Non-motorized recreation;
- Open space.

Top Three Most Undesirable Uses of the Lands along the Snake River:
- Sell for housing development;
- Motorized recreation;
- Sand/gravel mining.

Finally, the CVM confirms that the most popular management strategy emphasizes retention of public lands in public ownership, wildlife protection at the expense of slightly lower recreation use, elimination of livestock grazing, and the prohibition of sand and gravel mining.

RECEIVED MAY 15 2003 BLM PINEDALE FIELD OFFICE

some of these lands. Only a few miles downstream in Southeastern Idaho on this same South Fork stem of the Snake, the BLM does an impressive and responsible job of managing nearly 30 some overnight campsites along 27 miles of river. From the Yellowstone Park South Entrance to Palisades Reservoir in Wyoming, a distance of nearly 100 road miles, there is not a single camping or picnic spot dedicated to private river users.

Naturally I cannot dictate future budgets or departmental interests of federal agencies. An avalanche of extractive mineral activities occupy a majority of this agency's resources. And the current political climate makes the sale of these widely separated parcels an easy way out.

Yet, calculating the value of additional recreational opportunities, even at a fair price to the users in this area of Wyoming, would represent a greater return than simply letting the BLM lands filter back into private ownership.

Recently the University of Wyoming and the 50-member board of its Rockefeller Institute for Environmental Resolutions met in Jackson. Many future projects involving just such public agency/private use and management were discussed. This particular situation, if time constraints were relaxed, would be the perfect study for such a motivated and well positioned organization to study.

Sincerely,
Paul Braun

The results of the CVM study, in concert with our collective missions, suggest that a blend of the alternatives will result in the best and most widely supported management plan for the Snake River planning area. Accordingly, we support and urge you to consider the following recommendations for incorporation into the BLM preferred alternative.

Summary

- Transfer of various parcels to well-suited public land-managing agencies with a demonstrated expertise in land management; or
- Retention of the land surface by the BLM while appropriate partners are found to take over management of the parcels;
- Prioritization of wildlife protection/open space and public access/recreation. Where natural resource and recreation values are in conflict, wildlife protection will be ensured at the expense of slightly lower recreation.

1 While the BLM preferred alternative identifies the values to be protected in a transfer ("public access, recreation uses, open space and wildlife habitat"), it fails to give clear direction to managing agencies when certain values are in conflict. In an attempt to clarify the responsibility of future managing agencies or partners, we recommend the BLM weight the four objectives to better reflect the results of the CVM. We urge you to adopt the following management objective:

> *The entities acquiring or taking over management responsibility of these parcels will be obligated under the terms of the transaction to apply management prescriptions to retain the lands, and maintain them free for wildlife habitat/open space and, second for recreation uses/public access.*

Objectives and Actions of the Preferred Alternative
The following list outlines management objectives and coinciding actions that are supported by our organizations and/or are supplemented by an alternative recommendation (italics). As proposed below, the objectives and action aim to clarify management directives for the acquiring entities in order to maximize wildlife values, access for recreation, and public benefit. Most recommendations reflect a combination of alternatives (reflected in parentheses).

Lands and Realty Management

2 Objective: Maintain existing public access to the parcels. Provide for continuing public access and use of the parcels. Actual ownership and/or management of the parcels would be by other public agencies or entities (per Preferred Alternative, [PA]).

3 Actions: In general, opportunities for public access (primarily non-motorized) would be maintained as a condition of their transfer to other agencies. However, access to

specific areas may be closed or restricted to protect public health and safety and sensitive resources (e.g. bald eagles) (combination of PA and Alternative C).

4 • Any sale, exchange, or transfer of public land would include, where appropriate, the use of conservation easements to prohibit development and preserve scenic values, wildlife and public access (PA,JHCA,WOC).

5 • The Snake River corridor would be designated as a Special Project Area to allow the use of Land and Water Conservation Funds to acquire recreation and conservation easements (Alternative B).

6 • The following would be right-of-way exclusion areas: big game crucial winter habitat; raptor nesting and concentration areas; threatened, endangered, proposed, and candidate species habitat; aquatic and wetland sites; Wyoming BLM sensitive species habitat; important cultural resources that are listed or eligible for listing on the National Historic Register (Alternative C).

Livestock Grazing Management

7 Objective: *Where grazing is permitted*, land management should maintain or improve ecological conditions for the benefit of (*livestock-use-over*) wildlife habitat, watershed values, and riparian areas (PA, JHCA, WOC).

Actions:

8 • The current amounts, kinds and seasons of livestock grazing would continue to be authorized as long as the parcels are held by BLM, unless monitoring indicates a grazing use adjustment is necessary, or an environmental assessment indicates a change in grazing use is appropriate (PA).

9 • Adjustments in the levels, *location and timing* of livestock grazing would be made *if monitoring demonstrates a need to correct ecological degradation* (PA, JHCA, WOC).

10 • If the lessee's adjacent property for any existing grazing lease were converted to other uses to the extent that livestock grazing is substantially excluded, then that grazing lease would expire, and would not be available to other applicants (PA).

11 • No fall grazing would be permitted on parcels administered by BLM. The grazing season would end on August 31 annually (PA).

Minerals Management

12 Objective: A long-term protective withdrawal would be pursued for all public lands and federal mineral estate in the planning area (15,125 acres) to prohibit the staking and development of mining claims (PA). *The extraction of sand and gravel would only be considered to facilitate restoration efforts in the Snake River, to the active, unregulated channel within the lessee* (JHCA, WOC).

13 Actions: The mining of sand and gravel, and associated access across public lands for recreation purposes would be subject to seasonal requirements to protect fish spawning,

JHCA, WOC); control existing noxious weed infestation and prevent their spread (PA).

23 Actions: Control of noxious weeds and other invasive species may include manual, mechanical, biological, or chemical methods. If herbicides are proposed for use, those with minimum toxicity to wildlife and fish would be selected. All herbicides applied must be on the BLM-approved list and applied in accordance with EPA label requirements (PA).

Watershed Management

24 Objective: Riparian areas would be maintained for wildlife habitat as a condition of transfer of the public land parcels (PA).

25 Actions: Efforts would continue to improve water quality by cleaning up dumpsites on public lands, and encouraging dumpsite cleanup on adjacent lands (PA).

Wildlife Habitat

26 Objective: Maintain or enhance riparian and upland habitat for wildlife and fish and promote species diversity (PA).

Actions:

27 • Measures to protect avian habitats would include seasonal restrictions on surface-disturbing activities within distances to be determined based on species, individuals, and/or habitat characteristics (PA).

28 • The acquiring or managing agency or entity would make decisions regarding actions necessary to maintain wildlife, wildlife habitat, *and wildlife migration corridors as established by sound conservation biology* (PA, JHCA, WOC).

29 • Projects that maintain or improve fisheries habitat as much as possible in a broad system would be considered. Cooperative efforts with WGFD, U.S. Army Corps of Engineers (COE), Teton County, and others would continue. Projects that adversely affect fisheries *should not be allowed* (PA, JHCA, WOC).

30 • Fence construction *and maintenance* on BLM parcels would require site-specific analysis *to assure that they are necessary. If fences are necessary*, construction must *conform to existing wildlife-friendly fencing standards* (PA, JHCA,WOC). Priority would be given to the modification of fences that are restricting wildlife movement in crucial big game habitat areas and along migration routes. All parcels not currently leased for livestock grazing would be closed to future applications (PA).

31 In conclusion, our organizations would like to iterate that the transfer of ownership of public lands should remain in the public interest. Specifically, we are aware of the Jackson Hole Land Trust's proposal to acquire approximately 956 acres of BLM land. Accordingly, we have concerns about the intended sale of the parcels from the Jackson

important wildlife habitat areas, and periods of high recreational use (PA, JHCA, WOC).

Off-Highway Vehicle Management

14 Objective: Minimize motorized vehicle use where *OHV use and sensitive resource values are not in conflict* (PA, JHCA, WOC). Maintain existing opportunities for non-motorized vehicle use (PA).

15 Actions: *Where OHV's are allowed, there should be strict enforcement in order to meet the BLM or other land management agencies' resource requirements. This should be a condition of transfer of the public land parcels* (JHCA, WOC).

Recreation Management

16 Objective: Increase opportunities for quality recreation use and provide improved visitor services while protecting other sensitive resources. Provide for responsible commercial recreation which provides for the protection of visitors/public health and safety, the protection of natural resources, and well-managed visitor use (PA). *Opportunities for recreation use would be reduced in favor of other resource values when it can be demonstrated that recreation use is negatively impacting the natural environment* (JHCA, WOC).

Actions:

17 • Public lands along the Snake and Gros Ventre rivers would be designated a Special Recreation Management Area to facilitate management of recreational activities such as floating, fishing, hiking, winter sports, and commercial, competitive and group activities (Alternative B).

18 • A Recreation Area Management Plan (RAMP) would be prepared. The RAMP would provide for the management of public recreation use and the provision of services (e.g. *sanitation*) needed to maintain public health and safety, while protecting natural resources. The RAMP would direct the types and level of recreation use, services, facilities development, and public information (Alternative B).

19 • Public access would be maintained at the Wilson Bridge boat and river access site for river floating; a boat and river access site could be developed near the South Park Bridge *(if determined through a public process)* by an agency or entity other than BLM; additional *river* boating access could be developed by an agency or entity other than BLM (PA, JHCA,WOC).

20 • Recreation sites and facilities on public lands would be maintained or developed consistent with the protection of riparian habitat (Alternative B).

21 • Decision on user access fees would be made by the acquiring or managing agency or entity (PA).

Vegetation Management

22 Objective: Maintain or improve the diversity of plant communities to support wildlife habitat, watershed protection, and scenic resources (*and livestock grazing use*) (PA,

Hole Land Trust to adjacent private property owners with no assurances that wildlife and public access will be allowed.

At a minimum, it seems the public can only be guaranteed resource and public access protection if the lands are retained by public land or wildlife managing agencies or organizations. Following extensive discussion with various local agencies and organizations, it seems the most successful scenario for transfer of the parcels would require a collaborative effort where federal agencies work cooperatively with other entities that have a public interest in recreation and wildlife management.

32 Moreover, we feel strongly that a Recreation Area Management Plan is an essential part of the BLM process. Once the RAMP is prepared, the community at large, including other federal land managing agencies, potential non-profit organizations, and Teton County, could effectively participate in an informed discussion concerning the appropriate management and managing entity of each parcel. Until that information is available, it is very difficult for the general public to determine which parcels would best be managed by the County, the Forest Service, the Land Trust and/or other agencies/non-profits.

It is our opinion that a comprehensive exploration of a combination of alternatives would best serve the public and render a highly successful community solution for wildlife, recreation management and public access.

Thank you for your consideration of our concerns. If you have any questions, please do not hesitate to contact us.

Sincerely,

Anne Hayden

Anne Hayden, Program Assistant
Jackson Hole Conservation Alliance

Meredith Taylor (pmc)

Meredith Taylor, Yellowstone Program Director
Wyoming Outdoor Council

40

To: Kellie Roadifer
Bureau of Land Management
Pinedale Office

From: Snake River Fishing Trips
Dba Jack Dennis Fishing Trips
Box 3369, Jackson, WY 83001

RE: Snake River RMP comment

Dear Kellie and Marlin,

I recently finished going through the Snake River RMP and felt best to make a few comments. Among your alternatives it appears that the bureau prefers to transfer parcels of land to "another public land managing agency or to private non-profit land preservation entities". The preferred public land managing agencies of choice for many
1 of the parcels are the U. S. Forest Service and Teton County. I prefer to see land kept in public agencies because they are more likely to maintain a good public access. By access I don't necessarily mean road access. Much of the access to the parcels is currently by river only. To many times in the past has land been closed off to public use. I can see access to public land as a problem in the future if we don't address the problem now. This is a good way of addressing that problem.

2 With reference to "salable minerals" I'm against seeing sand and gravel operations in the river bottom. Not only does it have the potential of changing the river but is unsightly.

These are very important pieces of land in a high profile area. More than anything else I don't want to see another "Canyon Club" on the river. It is likely that this document will take several revisions before the public is happy with it.

3 Some suggestions for the parcels are listed below:

PARCEL	PREFFERED USE
3	Transfer to Grand Teton National Park
4	Transfer to State land or Teton County
7	Transfer to Forest Service or Teton County as a river use spot, possible picnic spot
8	Transfer to Grand Teton National Park
9	Transfer to Teton County
11-12	Transfer to Teton County
13-14	Transfer to Teton County or Forest Service as boat access
15-19	Transfer to Teton County

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"leany masters" <dillarson@hotmail.com>
To: pinedale_wyoma@blm.gov
cc:
Subject: Snake River RMP/Kellie Roadifer and Phil Mecham
Date: 05/13/2003 06:41 PM

Dear Mr.Roadifer and Ms. Mecham:

Thank you for this opportunity to comment on the BLM's planning efforts on the Snake River properties in Teton County. I acknowledge the difficulties in managing these disparate and unique properties. I also applaud the Draft EIS's thorough review and production of the six alternative Riparian Management Plans (RMP). I would like to forward my support of the Preferred Alternative- with some notable additions.

I believe very strongly that these parcels should stay in public ownership under public management. Any management plan that would allow for transfer
1 of these properties into private ownership should be dismissed. Private ownership of these lands raises three concerns. The primary concern would be the loss of public commentary opportunity to any subsequent management Decisions. The conservation easements protecting these parcels for the landowners would not allow proper flexibility in adjusting management practices in response to changing river corridor issues.

40

21 Transfer to Wyoming Game and Fish to manage spring creeks or possibly use for fishing access from the river
22 Transfer to Forest Service or Teton County as possible picnic or camping area
23 Do not transfer to Snake River Ranch, transfer to Teton County, Forest Service or Game and Fish instead
26 Transfer to Forest Service, they have the downstream locations
27 Transfer to Teton County for trash.

Sincerely,
Bruce E. James
Manager, Jack Dennis Fishing Trips

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2 Secondly, private ownership will reduce the public's access for use. Though recreation easements will supply limited access, it will not be at current access levels nor will it allow for future use changes.

3 Third, the Draft EIS lists numerous watershed, fish and wildlife issues in need of mitigation. As example is the effect of continuing levy construction and other manipulations to artificially contain the river channel. The Snake River Restoration Project (collaborative between Teton County and Army Corps of Engineers) aims to address this situation. These parcels are within this corridor and as such, should remain in public hands until project completion.

4 While I understand the BLM's desire to divest itself of this management obligation, it is clear that the agency has a responsibility to manage this land in the public's best interest. It seems that there are a variety of approaches that the agency could consider that would accomplish both these goals.

First, any plan that would result in private ownership, whether through direct sale or transfer via a non-profit, should be viewed with ultimate suspicion. Private ownership and well intentioned conservation easements will not meet the multiple-use or enhancement goals stated in the EIS.

Management responsibility through a shared ownership/management agreement should be considered as outlined below:

1.BLM retention of the land ownership with subsidiary group management. This allows the land to retain the advantages of being BLM while relieving the agency of the management responsibility.

2.Transfer of land ownership to another public agency with either direct management by that agency or management by a subsidiary group.

3.A tiered transfer- transfer of ownership to appropriate public agencies based on individual parcels evaluation. For example, Teton County would own/manage the bridge parcels and the parcel NX of the Wilson Bridge (Parcels 9 and 10), Fish and Game would own/manage parcels adjacent to the NIX Refuge, etc. The BLM would retain ownership of parcels throughout evaluation process. I believe that there would be strong interest in the non-profit community in helping to facilitate this process.

The above options should be considered as additions to the Lands and Realty Management section of the Preferred Alternative. I believe that the management objectives and actions regarding the other land use or resources can be accomplished within the framework of the above suggested implementation plans.

I am not a natural resource planner. However, I do believe that the above suggestions should act as impetus to explore shared ownership/management possibilities as decisions regarding these properties are made. This community has ample public and non-profit resources. Let us use them to preserve this valuable commodity.

Thank you for your consideration in this matter.

Leany Masters
PO 124
Teton Village, WY 83025
dillarson@hotmail.com

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"Ian Lovenson" <ilovenson@theragen ak.com>

To: <pinedale_wymail@blm.gov>
cc:
Subject: Snake River Land Management

08/14/03 07:18 PM

Dear Snake River RMP Team Leader,

I am writing to express my opinion on how BLM land along the Snake River should be handled. I am a six year resident of Jackson Wyoming, and a frequent recreational user of the Snake River. I believe that the land in question should remain in the hands of the public. I am opposed to any plan that would limit my access to the river on a recreational user, or result in development of the land. I believe that transfer of the land to the land Trust and the subsequent selling of the land to private owners would threaten my access to the river as well as threaten the undisturbed natural character of the riverside habitat.

Sincerely,

Ian Lovenson
Home Phone: 307-733-5993
Work Phone: 307-739-8900 ext. 2
Fax: 307-739-8992

43

Carolyn Kind.com

To: pinedale_wymail@blm.gov
cc:
Subject: Snake River RMP

Dear Team Leader:

Alternative C best protects the river corridor quality by reducing commercial river traffic through a permit system and restricting other growth. This alternative is the only one that disallows development of a major boat launch at Parcel 76 of the South Park Bridge that would primarily be used for commercial outfitters.

The SE portion of this parcel is particularly unsuitable because it is a raptor habitat and nesting area, and because it is immediately adjacent to private property and residences.

The document states on page 57, that the BLM parcel is "better for loading and launching during high water when the opposite bank is often flooded." This is just not true and I have given the BLM and its consultant photos showing that this parcel is completely under water at times when the existing boat launch is not. The document also says the public need "office safer vehicle access..." but this would only be the case if the highway is widened. The same could be accomplished at the existing site.

The Wyoming Environmental Quality Act recognizes that certain activities create impacts that constitute public or private nuisances, and permits can be denied on this basis. Development of a recreation area that will be used by tens of thousands of people will result in noise and visual pollution, loss of enjoyment of personal property, and devaluation of property, and thereby be considered a "nuisance."

The main proponents of this development are the commercial outfitters – the very people who have created a crowding problem by their overuse of this unpermitted section of river for their own profit. Those of us who live adjacent have made it clear to you in previous meetings and newspaper that we do not want to see this parcel developed. After all, we're the ones who have to live with it.

I don't see, however, in Alternative C, why the little bit of livestock grazing that remains in Teton County should be banned from these parcels overall. If it were not for these cattles, there would be little open space left on the valley floor.

Your survey indicates that Management Strategy C was favored by a 2:1 margin. Clearly, maintaining the integrity of the river is most important to the public and Alternative C best meets that goal.

Carol Kaminski
PO Box 2570
Jackson, WY, 83001
307-733-0167

44

"Mike Varilone" <mvarilone@hotmail.com>

To: pinedale_wymail@blm.gov
cc:
Subject: Snake River Lands

05/15/03 08:48 AM

Dear sirs,

I am a Jackson Hole Valley resident of 15 years. I have been a river user for nearly the entire time I have lived here. I believe the Snake River is one of the most important resources our Valley has. I am writing to comment on your plans for the lands you oversee in the Jackson Hole Valley. I strongly believe the lands should remain PUBLIC!! I believe the best option for these lands is to have them remain under government supervision. I understand these parcels are a long ways from your offices in Pinedale as well as other lands you manage which makes it difficult for you to manage these certain parcels. I would like to recommend management of these parcels be turned over to the U.S. Forest Service so they can be directly managed by the Bridger-Teton office. The B-T office already manages a large amount of the Snake River near Jackson Hole (specifically the Snake River Canyon). I believe their agency would be well suited to manage these parcels since they already have this experience with other portions of the Snake River.

I would like to make it perfectly clear that these lands should NOT be sold to ANY private parties! These are public lands and belong to everyone. I would also like to see Man remain free from development forever. Too much of the area along the banks of the Snake in our valley has been ruined with dikes and levees in order to protect a minority of rich landowners who were foolish enough to build their homes in a floodplain.
Unfortunately, most of the river users in our valley probably will not comment on this issue, but I can guarantee you 100% of them feel the way I do. Please have the foresight to protect these lands and keep them in the public hands for many future generations to come.

Sincerely,

Michael Varilone
Box 4094
Jackson, WY 83001
mvarilone@hotmail.com

45

smaders <smaders@wamnet.net>

To: <pinedale_wymail@blm.gov>
cc:
Subject: BLM land parcels on the Snake River

08/16/03 10:44 AM

I wish to voice my strong concern regarding the Jackson Hole Land Trust proposal to buy public land along the Snake River and then turn around and sell it to the adjoining land owners. I feel this violates the basic idea underlying publicly held land as I understand it....it is to be managed in the public interest. And turning it over to private ownership is hardly in the public interest.

Public access needs to be maintained without restrictions which is unlikely under any private ownership arrangement. Also the maintenance of public input into management decisions would most certainly no longer be possible which, from my point of view, is unacceptable. Therefore, I urge you to reject this proposal.

If this idea has stemmed from the difficulties arising from a reduced operating budget brought on by recent and possible future tax reductions, why not lobby against such tax cuts...publicly as well as privately. Too many valuable activities of dedicated federal agencies are being underfunded, curtailed and discontinued. This trend is deplorable.

Again, I urge you to reject the proposal to sell land to the Jackson Hole Land Trust for the purpose of having it then be sold into private ownership. This land is our collective heritage. It should stay in the public domain.
Sincerely,
Carol Maders
PO Box 85
Teton Village, WY 83025

46

"Jon" <jonwilt@livewaterpropertiies.com>
05/14/03 10:20 AM

To: <jonwilt@livewaterpropertiies.com>
cc: "Brenda Wyle" <BWyle@aol.com>, <mpark@wadhudsonbay.com>, <Mike@livewaterpropertiies.com>
Subject: Snake River Property

To whom it may concern:

I am writing in response to an article posted in the Jackson Hole newspaper yesterday "detailing" a proposed land sale by the BLM to the Jackson Hole Land Trust. In fact, the article provided few details or the specifics. My concern is continued public access and control of the land in question. While I can appreciate the goals of preserving the property, I don't think preservation at the cost of public access is the answer. More specifically, I think, at the very least, that the present access (or the equivalent) should
1 be preserved, and possibly even allow for spots that can be reserved for overnight camping. The historic public access (between the cities) along the Snake has worked. I am concerned that placing these lands
3 in the hands of private parties could lead to significant conflict over access in the future. Moreover, the fact that these lands will be beyond the public's control, is of even more concern. This property has been effectively polled up to this point, and the fact that the BLM finds the logistics of taking care of this property burdensome is a poor excuse to jeopardize such a treasured resource. If access is limited on

this piece, won't it result in pushing these people to even more pristine and treasured areas that previously were not subject to such traffic? I ask that you make every effort to make this proposed land sale a
4 transparent process allowing ample time for public comment and input.

I appreciate your time and your continued efforts to arrive at a solution that works for all parties concerned.

Jonathan Wyle
Live Water Properties
PO Box 8240
409 S. Cache St.
Jackson, Wyoming 83002
jonwilt@livewaterproperties.com
307-734-6180 (office)
307-690-6190 (cell)
307-734-6182 (fax)

48

"Gregg Dean" <deanhouse@wmisp.com>
05/15/03 05:44 PM

To: <jonwilt@livewaterpropertiies.com>
cc:
Subject: Snake River lands

Dear Sirs,

1 As long time Snake River users and residents of Teton County we wish to state in the strongest terms possible the need for continued public access to the Snake River corridor and its riparian lands. Public land should remain public land open to public use and not be sold to private individuals who can restrict that public access.

sincerely,
Gregg Dean box 213 Wilson, Wyoming 83014
Jerry Dick Pearce box 412 Wilson, Wyoming 83014

47

"Guy Tarck" <gtarck@wyom.net>
05/14/03 02:23 PM

To: <jonwilt@livewaterpropertiies.com>
cc:
Subject: Proposed BLM land sale of 1873 acres along the Snake River, Jackson Hole, WY

May 14, 2003

Re: Proposed BLM land sale of 1873 acres along the Snake River, Jackson Hole, WY
<?xml:namespace prefix = o ns = "urn:schemas-microsoft-com:office:office" />
I recently have become aware that the BLM manages 1873 acres of public lands along the
<?xml:namespace prefix = st1 ns = "urn:schemas-microsoft-com:office:smarttags" />Snake River in Jackson Hole, WY. This even though I have lived in Jackson and floated the Snake River for 22 years. It has also come to my attention that the BLM is considering a proposal to sell this land to the Jackson Hole Land Trust and that it would ultimately be sold to adjoining land owners.

While I understand that the BLM basically finds managing these lands to be a pain in the butt and a drain on a limited budget I do not believe that selling off our public lands is what smacks of a sweetheart deal for wealthy riparian land owners is the solution to this problem.

It strikes me as odd that adjoining land owners have all been contacted and have agreed to purchase said parcels in advance. Unless, that is, the idea originated with said land owner(s). And if the adjoining land owners don't want to purchase the parcels who will get them?

1 I urge the BLM to retain these lands for use by the public. Furthermore I would suggest that the
2 BLM mark these lands (so we know exactly where our public property is) and that river users be allowed to use these parcels for fishing access, primitive camping and other low impact uses.

3 I have been told that the deal that is being worked out between BLM and the Land Trust would ultimately allow public access only along the levees but not to the lands that lie behind the

levees. If this is true, it is totally unacceptable, as is the policy of promoting the removal of public lands from the public domain.

Sincerely,

Guy Tarck
PO Box 10768
Jackson, WY
gtarck@wyom.net

49

"helenbrad" <debotnoul@comcast.net>
05/14/03 08:08 AM

To: "BLM Snake R. RMP lands leader BLM" <jonwilt@livewaterpropertiies.com>
cc:
Subject: public lands in Teton,Co Wy.

1 Dear Sirs- Please keep in mind that public lands should allow public access. Please don't sell your lands
2 in Teton Co,Wy.
The Forest Service has an existing plan for management of lands adjoining the Snake River. Please allow them to manage your properties according to that existing plan.
Please don't allow public lands to become private.
Thank you, Scott Hocking , Po. Box 136,Wilson,Wy 83014

50

"Alice Maher"
<alice@lowwaterproperties.com>
05/14/03 05:16 PM
Please respond to "Alice Maher"

to: "Tim Lindstrom" <tlindt@teton.net>, <pinedale_wymail@blm.gov>
cc: "John Holland" <jholdeke@yahoo.com>, "Shane Hollingsworth" <contact@snowcrest.net>, "Jon Wyler" <jonw@lowwaterproperties.com>, "Jay Backus" <jbackus@wyoming.com>, "Jim Broderick" <JimmyBro@aol.com>, "Margie Lindstrom K. Maher" <mlindstrom@lowwaterproperties.com>
Subject: 1673 acres on Snake River

Dear Mr. Lindstrom and Snake River RMP Team Leader:

I am very interested in seeing a map of the 1673 acres in question for sale to the Land Trust and needs at market value. My guess is that most of this land is literally the bottom of the Snake River and cannot realistically be developed anyway. If I am correct in this assumption, I'm at a loss as to what justifiable reason the Land Trust would have in turning this ground over to private ownership. The obvious reason is to raise money with retail sales of the property.

While I believe in the general mission of the Jackson Hole Land Trust, I don't think this is an appropriate method of raising money for the cause.

The newspaper article is vague in many respects and leaves fears that some type of backdoor politics is occurring. I know the people working at the Land Trust and am doubtful they have bad intentions. However, I'm worried.

1 Besides the concern that these lands provide to the fishing public, they constitute one of a very few places on the valley for public waterfowl hunting. It would be a crime to take that away. That taking would be impossible to justify.

I hope that you see this project is not a wise decision and deny its approval both at the Bureau of Land Management and the Jackson Hole Land Trust.

Thank you for your time.

Alice Maher - Broker/Owner
Low Water Properties, LLC
Box 1040
Jackson, WY 83002
www.lowwaterproperties.com
307-734-9700
307-734-9702 fax
307-690-9675 cell

51

"peter theymann"
<ptheymann@bossnet.com>
05/16/03 01:08 AM

To: pinedale_wymail@blm.gov
cc:
Subject: land trust purchase

Attn: RMP Team Leader

My feelings on the land trust issue regarding BLM lands on the snake river between Grand Teton Park and South Park echo those of Aaron Prezan and the Conservation Alliance. The sale
1 of public lands and, in turn, the resulting restricted public access is fundamentally wrong. I feel we need to allow the BLM to perform its designated job in managing the proposed properties. Such a sale would benefit only a few interested groups and ultimately the public will suffer. Finally, I feel this whole process has been a rushed issue and needs considerable more time and thought invested before a final decision has been reached. Perhaps a public forum would be the best course of action.

Pete Freymann
Teton Troutfitters

52

Lee Riddell
<lriddell@wyoming.com>
05/16/03 12:13 PM

To: <pinedale_wymail@blm.gov>
cc:
Subject: Snake River RMP Leader

Dear BLM Snake River RMP Leader,

1 I am writing in support of the plan that the Jackson Hole Land Trust, Grand Teton National Park, and the Teton County Commissioners are presenting to you, where they would buy BLM land along the Snake River in Jackson Hole. The current group of County Commissioners has the best interests of our wildlife and natural environment in mind, and both the Land Trust and the National Park are stewards of the highest order.

2 My primary interest is to see unlimited public access continue on these parcels. Public land is a valuable public commodity and unlimited access needs to be protected. If the land is resold to a private person it should be their responsibility to fence people out of what is now their private land.

respectfully submitted,

Lee Riddell
PO Box 1628
Wilson, WY 83014
307-733-8083, x13

53

American Wildlands
"Science-based conservation for the Northern Rockies."

May 16, 2003

Kellie Roadifer, Snake River RMP Team Leader
U.S. Bureau of Land Management
Pinedale Field Office
P.O. Box 768
Pinedale, WY 82941
Sent by e-mail: pinedale_wymail@blm.gov and by mail with map attachments.

RE: Snake River Resource Management Plan

Dear Ms. Roadifer:

Thank you for talking this week on the phone and the opportunity to comment on the DEIS for the Snake River Resource Management Plan. American Wildlands, a non-profit conservation organization based in Bozeman, MT is dedicated to protecting Northern Rockies native ecosystems. The comments below are those of AWL and are on behalf of our members.

American Wildlands is specially concerned that water quality and wildlife corridors are adequately protected. The attached water and wildlife corridors maps demonstrate the importance of the RMP area to water quality and wildlife.

1 The wildlife corridors map clearly points to the RMP area as critical to wildlife connectivity. The Aquatic Integrity Analysis similarly shows the importance of the RMP area as a stronghold for water quality and fisheries. Therefore, we specially urge the BLM to consider these data and protect the wildlife and corridors integrity in the management area.

American Wildlands incorporates the following comments from the Greater Yellowstone Coalition. We share GYC's specific goals and criteria regarding the RMP.

Thank you for considering our comments. Please contact me if you need additional information or assistance.

Sincerely,

Sta Lova

RECEIVED
MAY 19 2003
PINEDALE RESOURCE AREA OFFICE

P.O. Box 4809 • 40 East Main Street, Suite 2 • Bozeman, Montana 59771 • Tel. 406.586.6179 •
P.O. Box 1166 • Cody, Wyoming 82414 • Tel/Fax 307.527.7482
Email: info@wildlands.org • Website: www.wildlands.org

Land Ownership

The BLM states in the DEIS that the reason it wants to dispose of these riverfront lands is because they are located far from the Pinedale District Office, they are scattered and irregularly shaped, and because adjacent landowners along the Snake River have expressed an interest in acquiring them. While all of these things may be true, there are other ways to address these challenges without disposing of these lands. For instance, if management oversight is difficult because of the distance from Pinedale, the BLM could easily transfer some of its Pinedale staff to Jackson, where they could share space with another federal agency that already has an office there. It is our understanding that even if the BLM chooses to develop a Recreational Area Management Plan, it would need only two or three staff in Jackson.

Likewise, if it is problematic that the BLM parcels along the Snake River are scattered and irregularly shaped, the BLM could seek to consolidate them by designating a Special Project Area, thus allowing Land and Water Conservation Act funds to be tapped. When confronted with similar challenges along the South Fork of the Snake River in the mid-1980s, the BLM's Idaho Falls field office chose to aggressively consolidate its scattered riverfront lands rather than dispose of them. Since 1991, the Idaho Falls field office has acquired fee title to 24 properties and conservation easements on 23 other properties at a cost of nearly $22 million. In so doing, they have assembled a river corridor that is second to none for its abundant wildlife, thriving coldwater fisheries, and diverse, high-quality recreational opportunities. The reason they were able to accomplish this impressive feat this was because they looked at their scattered properties as a potential asset worth cultivating rather than a liability that needed to be unloaded.

As for the option of selling BLM lands to adjacent landowners, we strongly oppose this alternative for multiple reasons. First, it makes little sense to sell public lands to private interests when demand for public recreation along the Snake River already exceeds supply. As the DEIS states on page 67, "No other lands along the Snake River in Teton County provide the type of river access, close to town and residences, available on public lands in the planning area." Second, as evidenced by the Canyon Club fiasco in the Snake River Canyon below Hoback Junction, there exists the very real possibility that if the BLM sold its riverfront lands to private interests, they would be developed in a manner that damages irreplaceable ecological, recreational, and visual resources. Indeed, had the Forest Service acquired the Edgeworth property when it was up for sale a few years ago, the Canyon Club development never would have happened, and the U.S. Fish and Wildlife Service never would have had to issue an incidental take permit allowing the killing of 18 federally-threatened bald eagles.

Finally, while it may be tempting to hand these parcels over to a non-governmental organization such as a land trust, we discourage this for two reasons. First, it is highly unlikely that a land trust would have the resources (i.e. staff and money) to manage these lands for recreational use, as this is not a primary objective of most land trusts. And second, because riverfront property around Jackson is so expensive, it would be nearly impossible for a land trust to acquire adjacent lands in order to establish a more contiguous public corridor. Having said that, if the BLM opts to transfer some of its parcels to non-governmental organizations or private interests, we believe that any qualifying lands must first have a conservation easement placed upon them.

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Snake River, adjacent wetlands, and tributary streams. We also believe that the development of a Recreation Area Management Plan could reduce or eliminate recreational activities that harm sensitive resources (i.e. nesting bald eagles).

Recreation

As a rule, we strongly support the public's right to recreate along the Snake River, so long as it does not degrade the riparian corridor and the fish and wildlife that reside there. Apparently, however, recreational use along the Snake River between Moose and Wilson is already quite high and is likely to increase over time. It is for this reason that we urge the BLM to work with the local river recreation community to develop a Recreation Area Management Plan (RAMP). This plan could address such issues as overcrowding, day-use (e.g. picnicking), human waste disposal, and overnight camping.

Summary

In conclusion, we support the BLM's general direction in the draft Snake River RMP – which is to place a high priority on preserving fish and wildlife, low-impact recreation, and visual resources, and to prohibit activities such as mining, oil and gas development, and expanded grazing and OHV use that threaten to degrade those resources. However, we feel very strongly that these surface lands and accompanying federal mineral estate should stay in BLM ownership and not be transferred to a non-governmental organization or another federal agency. As stated earlier, transferring these lands to another federal agency does not resolve the issue of how to effectively manage scattered parcels of public land, and selling them to a local land trust, while certainly not the worst option, does not address the need to manage recreational use so it does not damage ecological and visual resources. It is for this reason that we endorse Alternative C – BLM Management for Preservation, with the few changes we suggested.

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Mining, Oil & Gas Development, and Salable Minerals

While we agree with the majority of the management actions described in the preferred alternative, we believe there is more the BLM can do to ensure that its lands continue to support healthy fish and wildlife populations and provide world-class recreational opportunities. To begin with, we believe the BLM should close all of the surface lands and federal mineral estate in the planning area to mining, oil and gas development, and sand and gravel extraction. In particular, we feel very strongly that sand and gravel extraction should not be allowed in the active river channel, as would be permitted under the preferred alternative. Such activity would alter the Snake River's form and function, thus adversely impacting riparian vegetation and fish and wildlife. If sand and gravel extraction is absolutely necessary to protect public infrastructure (e.g. bridges and levees), the RMP could make that exception.

Livestock Grazing

We also believe the preferred alternative does not go far enough to ensure that excessive livestock grazing does not degrade soils, vegetation, and other critical components of healthy fish and wildlife habitat. Rather than allowing existing livestock grazing to continue at current levels, we recommend that grazing be reduced or eliminated on allotments where overgrazing has been documented to be a chronic problem. According to the DEIS, two out of the four current grazing allotments in the planning area – the Walton allotment and one of the Porter Estate allotments – have failed standard #4 of the BLM's Standards of Healthy Rangelands and Guidelines for Livestock Grazing Management due to heavy grazing use and damage to the native shrub community. At the very least, the BLM needs to develop grazing management plans for all of its existing grazing allotments. We concur with the recommendations in the preferred alternative that all parcels currently not leased for grazing should be closed to future applications, and existing grazing leases should be retired if and when the lessee's adjacent property is converted to uses other than grazing.

Off-Highway Vehicle Use

We concur with the preferred alternative's management objectives for OHV use – that it should be restricted to existing designated roads and trails – except where there are significant conflicts with non-motorized recreation. We share the BLM's concern that unauthorized trails are a growing problem. We therefore recommend that problem areas be clearly identified and targeted for vegetative restoration. We also concur with the management objective in the preferred alternative that would prohibit over-the-snow vehicles in the planning area.

Fish and Wildlife

We concur with most of the management objectives in the preferred alternative pertaining to the protection of fish and wildlife. However, in order to optimize conditions for fish and wildlife, we believe that all surface lands and federal mineral estate in the planning area should be withdrawn from mining, oil and gas development, and extraction of salable minerals. We furthermore believe that grazing impacts need to be reduced, OHV use should be limited to existing roads and trails, and noxious weed control should exclude chemical treatment, especially along the

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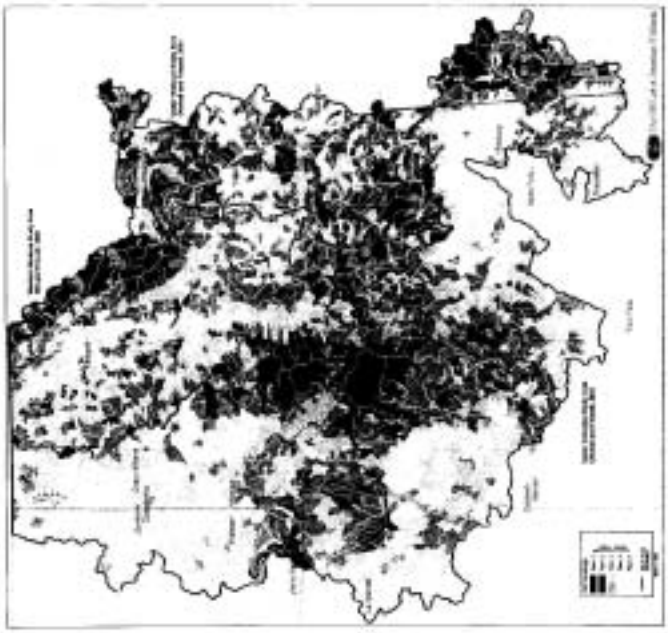

American Wildlands' Aquatic Integrity Areas Project

The Aquatic Integrity Areas (AIA) project represents the first systematic attempt to identify the best remaining subwatersheds for providing watershed integrity and upper aquatic diversity in the Northern Rockies. The project is from a comprehensive Geographic Information Systems (GIS) model to analyze the current conditions of native aquatic integrity across an entire catchment basin. The model predicts the relative aquatic conservation value of subwatersheds based on four components:

- human impacts measured by the proportion of unroaded land in a watershed,
- fish stocking history,
- occurrence native fish taxa and genetically pure populations, and
- the presence of threatened or endangered species and species of special concern.

The GIS Lab at American Wildlands is using the AIA model to assess large river basins throughout the region – the upper Missouri, Columbia, Yellowstone and Lewis. The end-product yields a relative ranking of watershed integrity and conservation value of drainages from high-ecological integrity, which is the most desirable, to low ecological integrity, which is the most degraded. Watersheds can also be ranked by overall or other variables.

Represents or have been degraded

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Potential Movement Corridors for Large Carnivores
Teton County, WY

54

REYNOLDS POMEROY II
PO BOX 1153 Wilson, WY 83014
Email reynoldsp@wyoming.com

May 16, 2005

Bill Mecham
Field Manager
Pinedale Field Office
Bureau of Land Management
432 East Mill Street
Pinedale, WY 82941

Dear Ms. Mecham:

Please accept this as a formal comment on your Draft EIS for the Snake River RMP.

1 It is imperative that the BLM parcels identified in the RMP be maintained in the public trust until a thorough review of management alternatives be completed along with a parcel by parcel inventory of wildlife, scenic, access, recreation, and habitat values. In fact, such an inventory may ultimately determine the feasibility and public acceptance of a management alternative. Accordingly, I generally support your preferred alternative, as it will allow up to fifteen years to determine the ultimate disposition of the parcels. I am completely against any transfer of ownership to any entity, private or public, until such time as the above review and inventory are completed through the public process.

From an access and recreation standpoint, the public has never had such an opportunity to establish and secure such significant frontage and adjacent lands along the Snake River corridor. As you know, local, regional and national demographics are all converging to increase demands on our public lands and resources, and we need to keep these lands and resources in the public trust as opposed to transferring them to private hands. Given the scarcity of data about the
1 parcels as they relate to the various values identified above, it would be premature in the extreme to even consider a change in ownership.

1 From a management perspective, there are undoubtedly several practical, efficient and cost-available alternatives that have not been fully explored, let alone presented to the public for their comment. It is imperative that your RMP process provides the time to evaluate, determine or design these alternatives. The incredible popularity of the stretch of river between the Wilson Bridge and the South Park Bridge requires a deliberate and potentially time-consuming effort.

Thank you for this opportunity to comment on the Draft EIS.

Sincerely,

Reynolds Pomeroy

55

Post Office Box 3343
Jackson Hole, Wyoming 83001

FRIENDS OF PATHWAYS

phone – 307-733-6134
fax – 307-733-9747

Comments for DEIS – Snake River Resource Management Plan – Snake River RMP

Dear BLM,

On behalf of the 900 members of Friends of Pathways, it is with great privilege to provide you with comments regarding the Jan. 21 Draft of the Environmental Impact Statement for the Snake River Resource Management Plan.

1 Friends of Pathways, an advocacy-based non-motorized transportation and recreation non-profit organization representing non-motorized needs in Teton County, Wyoming, is most concerned with maintaining and increasing existing non-motorized access for the BLM parcels. With that goal in mind, we feel that the Preferred Alternative as outlined in the plan offers the best opportunity for non-motorized access.

2 Since 1991, the Teton County appointed Pathways Task Force has recognized pathway connections from Emily Stevens (North from Hwy 22 & the Snake River Bridge) to the confluence of the Gros Ventre and Snake Rivers and on to the East end of West Gros Ventre Butte and connecting to Spring Gulch Road as a possible addition to Teton County's pathway network. Making note of this possible trail addition during the draft review process serves to make note of the eagerness of non-motorized users to walk, cross-country ski and bicycle to these tracts of land.

3 Concerning the definition of mountain bikes as referenced on page 61 of the draft. In the section, titled Off-Highway Vehicles, it states, "There are substantial differences in the types of use, associated impacts, and management approaches between non-motorized and motorized vehicle activities. Until a national strategy and rules for non-motorized vehicle use on public lands are established, the BLM will continue to include non-motorized use within the context of OHV designations." In November of 2002, the U.S. Department of the Interior / BLM finalized a plan titled National Mountain Bicycling Strategic Action Plan. As stated in a letter by Kathleen Clarke, "[T]he plan serves to guide BLM state office and field office managers and staff, interest groups, and individuals for implementing on-the-ground actions and resource protection measures for mountain bicycle use and other muscle-powered, mechanical transport uses." We hope that this action plan will be utilized to provide improved public land management in the Snake River planning area. The document can be located by on the net by following the enclosed address here:
http://www.blm.gov.80/mountain_biking/final_text.pdf

Thanks again for the opportunity to submit comments. Please feel free to call with questions.

Best regards,

David Vanderburg
Executive Director, friends of pathways

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MAY 19 2003
PINEDALE RESOURCE AREA

56

The Snake River Fund
PO Box 574
Jackson, WY 83001
(307) 739-9417
snakeriverintern@hotmail.com

A Community partnership between the US Forest Service and the Community Foundation of Jackson Hole

Comments on the Snake River Resource Management Draft EIS

Kellie Roadifer
Snake River RMP Team Leader
Pinedale Field Office
Bureau of Land Management
P.O. Box 768
Pinedale, WY 82941

May 15, 2003

Dear Ms. Roadifer,

We appreciate the opportunity to comment on the Snake River Resource Management Draft EIS. The Snake River Fund (SRF) would like to acknowledge the unique opportunity the public has in helping to manage these Snake River land parcels.

1 We feel strongly that the public lands be retained in the public trust. Public ownership facilitates public involvement in the land management process and it fosters flexibility and ingenuity when managing these high recreational use areas that have important recreational, wildlife, fisheries, and riparian significance. We are concerned that disposal of the parcels to private ownership would foreclose future options for responsible recreation opportunities and resource management. We are also concerned that disposal of these properties would prevent adequate evaluation of each parcel's importance to the community and local resources.

2 The Snake River corridor between Jackson Lake and Palisades Reservoir contains a myriad of floodplains, wetlands, and riparian forests. These resources provide important aquatic and wildlife habitat for such species as the Snake River cutthroat trout. The amount of public land not occupied by reservoirs or permanently stabilized (e.g. rip rap or levees) to prevent channel migration is limited. Therefore, these lands are crucial to maintaining some functioning floodplains, riparian forests, wetlands, aquatic and wildlife habitat.

Several years ago the public went through the NEPA process with the U.S. Army Corps of Engineers and Teton County to evaluate "the feasibility of restoring diverse and sustainable riverine (aquatic, wetland, riparian, and terrestrial) habitats" between Moose and the South Park Bridge. This required allowing the stream channels to migrate or braid, which would build

island complexes, rehabilitate degraded cottonwood stands, and improving aquatic habitat. This was not realistic since most of the adjacent lands are now occupied by expensive private
3 structures. To further the goal and objectives of the Snake River Restoration Project, we feel strongly that it would be judicious to maintain these BLM lands in the public trust to facilitate any opportunity to maintain and or improve the Snake River's existing conditions.

4 We outline a Snake River Fund proposal to implement the Snake River RMP EIS. This proposal provides a framework based on various attributes of the proposed six Alternatives and will address the objectives of the general public and the BLM. We understand that this is a step ahead of the RMP plan, but it should help facilitate the development of the final EIS.

Our objectives are to maintain the land parcels in the public trust, to develop a collaborative management plan with the appropriate agencies/non profit organizations, and address management related funding issues. The plan will also ensure that the lands are managed for public access, recreational use, open space, wildlife and fish habitat, and river health. The SRF believes that to accomplish these objectives requires a task force, built from the vested parties, to oversee the interim management of the land parcels and the subsequent transfer to the appropriate agencies and/or non-profits.

The Snake River Fund proposes that the BLM retain ownership of the parcels during an interim period during which time the proposed task force, including the BLM, Teton County, the Bridger-Teton National Forest, and other vested parties can provide interim management. Or a single entity, like the Forest Service, could oversee the interim management. We discussed this possibility with the Forest Service to ensure that this is a possibility. However it would better serve the public to have a diverse task force oversee the management. While the Snake River Fund and others have questions about how to fund the interim management, we suggest that this interim strategy is necessary until a cooperative management plan is developed. During the interim period the SRF could help facilitate the development of this collaborative management plan and the process to determine the appropriate public agency or non-profit organization that each parcel will be transferred to. This allows time to evaluate the individual parcels on their own merit. Then to determine which agency or organization would best manage the parcels, while maintaining public ownership.

Prior to completion of the lands transfer the task force would develop a land management plan based on a watershed management approach. It is assumed that the groups acquiring these parcels would be obligated under the terms of this management plan to maintain them for open space, wildlife and fisheries habitat, recreation use, and public access.

5 There are several good variations on this proposed plan that the BLM discusses in the Draft EIS. For example, if the BLM chooses to maintain ownership and management the best option is to

designate the public lands along the Snake and Gros Ventre rivers a Special Recreation Management area. This designation initiates a process for development of a Recreation Area Management Plan (RAMP). We feel that this level of analysis which directs the types and levels of recreation use, services, and facilities development for each parcel is an essential element that will dramatically help to inform the collaborative decision making process described above.

Please acknowledge that the aforementioned proposal is meant to initiate a conversation. We expect that with further discussion, several variations on the theme will evolve to even better reflect a solution worthy of broad based community support.

Thank you for your consideration in this matter. If you have any questions or comments, please feel free to contact us.

Sincerely,

Aaron Pruzan

Aaron Pruzan, President
(307)-733-2471

Frank Ewing

Frank Ewing, Vice President
(307)-733-1000

Transcript of public hearing held Wednesday, March 26, 2003, 5:00 p.m., at the Teton County Commissioner's Meeting Room at 200 South Willow, Jackson, Wyoming.

T&T REPORTING
CERTIFIED SHORTHAND REPORTERS

ORIGINAL

Reported By
Leslie Lewis RPR, CSR

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Idaho Falls, Idaho 83405
208.529.5491 • FAX 208.529.5496 • 1.800.538.5491

1 Dave Malachowski.
2 MR. MALACHOWSKI: Yes. Do I need to go
3 somewhere?
4 MR. MURPHY: Yes, come up here, Dave, please.
5 MR. MALACHOWSKI: Do I need to spell my name?
6 THE REPORTER: Yes.
7 MR. MALACHOWSKI: The last name is M, like Mary,
8 A-L-A-C-H-O-W-S-K-I. First name is Dave, D-A-V-E, address?
9 THE REPORTER: Yes, please.
10 MR. MALACHOWSKI: P.O. Box 836, Wilson, Wyoming,
11 83014. Phone number?
12 THE REPORTER: Okay.
13 MR. MALACHOWSKI: 307-733-2056.
14 THE REPORTER: Thank you.
15 MR. MALACHOWSKI: I'm a little confused with the
16 sake because I was expecting there would be more of the
17 public here, but I think most of you guys are the government
18 people. Right?
19 I would just like to say that I'm really happy
20 that this process is open and I would like to personally see
21 that whatever is the outcome of this process will insure
22 that these lands remain in the public hands. Either they
23 will stay with the BLM and will be managed for -- left along
24 the way they've always been or they will be transferred to
25 the responsible local agency which will manage them for the

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1 benefit of -- especially wildlife. That's one of the
2 resources threatened the most in Teton County. And then
3 there is a reasonable and safe way of doing it, I would like
4 to see the public access allowed on these lands.
5 One thing that I would not like to see, and I
6 would like to stress this very strongly, is a transfer of
7 this land to public -- to private ownership, which would
8 then allow any kind of real estate involvement, any kind of
9 build up of housing, mansions, whatever type of buildings
10 which would impede the survival of wildlife on those lands.
11 That's all I have to say. Thank you.

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2 Chapter 4, Page 155, Lines 11-15. The document states that conservation easements may be retained on parcels which would add a "layer of bureaucracy" to the management of the parcels. It is unclear to the Service under what circumstances conservation easements would be retained. The Service suggests clarifying these statements to state under what circumstances conservation easements would be added and to also specifically state what type and the term of the conservation easement.

3 Chapter 4, Page 157, Lines 21-22. The document states that protections required by law, such as cultural resource inventories prior to land disposal would apply. The Service suggests inserting "and Section 7 on consultation on Threatened and Endangered Species" into this sentence indicating that the Act would also apply and be complied with prior to land disposal..

If you have questions regarding these comments or suggestions on the draft Environmental Impact Statement for the Snake River Resource Management Plan, please contact Alex Schabert of the Wyoming Field Office at (307) 772-2374, extension 38.

cc: BLM, Cheyenne, Endangered Species Program, (J. Carroll)
WGFD, Cheyenne, Statewide Habitat Protection Coordinator (T. Collins)
WGFD, Lander, Non-Game Coordinator (B. Oakleaf)

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United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
4000 Airport Parkway
Cheyenne, Wyoming 82001

In Reply Refer To:
ES-61013/WGFWO/003

May 14, 2003

Memorandum

To: Snake River Resource Management Plan Team Leader, Bureau of Land Management, Pinedale Field Office, Pinedale, Wyoming

From: [illegible], Acting Field Supervisor, U.S. Fish and Wildlife Service, Wyoming Field Office, Cheyenne, Wyoming

Subject: Comments on the Draft Environmental Impact Statement for the Snake River Resource Management Plan

This response is in reference to the U.S. Fish and Wildlife Service's (Service) review of the draft Environmental Impact Statement (EIS) for the Snake River Resource Management Plan (RMP). This document was received by our office on February 18, 2003. The Draft EIS contains information relative to separate alternatives for management of the Snake River Resource Area and describes potential Bureau of Land Management (Bureau) activities and their effects to resources for Teton County, Wyoming.

After our review of the draft EIS, the Service has the following comments and suggestions for your use in finalizing the Snake River RMP.

General Comments

1. The Service recently received the draft Biological Assessment provided by the Bureau. The Service is currently reviewing this document and will provide our comments directly to the Bureau.

2. The Service recommends that the Bureau indicate all commitments and conservation measures that the Bureau intends in regards to listed species. The Service understands that the Bureau is currently undergoing statewide programmatic consultation on existing RMPs to develop consistent commitments and conservation measures on listed, proposed, and candidate species within Wyoming. The Service understands that these commitments and conservation measures when developed and finalized will be part of Bureau RMP directives and will be incorporated into all Wyoming Bureau RMP's by RMP maintenance actions, or RMP amendments where appropriate.

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PO Box 4457
Jackson, WY 83001
May 14, 2003

Prill Mecham
Pinedale Field Office
432 East Mill Street
PO Box 768
Pinedale, WY 82941-0768

Dear Ms. Mecham:

I have reviewed your Snake River RMP, and have listened to the JH and Trust's proposal for assisting in the disposal of the public resources you are charged managing in Teton County. I offer the following input for your review.

1. These lands are owned by the public, and the federal government as a responsibility to manage the lands they are charged with protecting. In the past survey research done by your office, I believe that something like 80% of your public responses asked that these lands be kept in the public trust, and managed by the federal government mainly to provide wildlife protection and recreational access. Your many alternatives considering disposal of your responsibility appear very self-serving, and go against what the American public has asked you to do. Any attempts to shift these lands to private ownership are detrimental to the resources you are charged with managing and protecting. These lands must remain in the public trust, and be managed to the levels required by your national policies, or by another agency like the Forest Service. The parcels and the river may also be managed through a management agreement with a local river organization willing to manage the parcels that have a stake in watershed management and recreation administration, such as the Snake River Fund. Once again, any attempt to take these lands into private ownership through highly discounted sales or auctions in this area is poor management by you, and will be met with a great deal of opposition!

2. Your plan speaks very little to the outstanding features of the section of river where your parcels are. You give a passing acreage description in a couple lines of text, and little else. Each of these parcels must be analyzed and evaluated so that social management issues can be determined to ascertain what is best management prescription for each parcel beyond dumping it on the first unsuspecting greedy private organization that desires to make a profit off of it. Your plan also fails to address overall river health, the impacts that have been caused by the past 40 years of BLM

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"management by not managing" technique. The past, present and foreseeable impacts of the condition of the river and parcels caused by your agencies lack of management actions must be studied and evaluated; not just described in a couple of sentences.

4 3. The Jackson area has numerous organizations that would be interested in helping with land management functions if they were approached by the BLM. Most would be interested in participating without the need to have land deeded over to them. Not fully evaluating these issues on your part would be a terrible mistake!

5 4. This section of river that the federal government owns all the public access to, falls victim to more and more significant problems each year as more commercial and noncommercial river users attempt to float this section. Federal guidelines require that all commercial operations doing business on public lands must be evaluated and placed under special use permit if permissible. Your failure to follow federal management guidelines has led to many impacts on the river including frequent conflict between users on BLM parcels, negative impacts on the unregulated commercial float fishing industry, and problems with perceptions of overcrowding that ruin the river experience for many. Failure by you to manage and preserve these parcels and waters will lead to more and more problems. River use will continue to rise, and if still unmanaged and unregulated, impacts will affect neighboring landowners and others. This is not an acceptable option for anyone. The current lack of management personnel on duty on this part of the river has already led to violent confrontations, excessive human waste on some private land parcels next to the river, and has created a huge health and safety problem with an unregulated rafting and fishing industry that may or may not have adequately trained guides, insurance, safe boating skills and vehicles, and is not compensating the federal government for this use as mandated.

6 5. You parcels on this section of river are the only public access available. It is imperative that these parcels remain in public management! If not, access to this section of river can be lost! These situations frequently allow greedy landowners to be able to charge excessive fees to people desiring access through private lands, getting on and off the river. This is an atrocious issue to think about coming to fruition! Even if you dumped these parcels on to Teton County to manage, there could be great inquiries that Teton County could charge the public. Some rivers in California and on the east coast have counties that charge over $40/person to launch from their properties. This must not be allowed to happen. These lands must remain in the public trust, and any financial gains that come from river management must go back to taking care of the river and federal lands.

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attempt to do what is right by the American public you work for. It is very apparent that you do not care to participate in land management in Teton County, nor do you care what happens after you sign the property over to anyone who is willing to take it. That is quite sad, and speaks volumes about your agencies desire to do serve the people who have trusted them with caring for our public treasures!

10 9. A real environmental evaluation must be done on this section of river looking at the river system, and not just individual parcels. Although it will cost a great deal of money to put an allocation system in place, you must do that before moving any further with your plans. Merely signing over parcels to others will not achieve this necessary process. Turning your back on the problems you have created is unacceptable. Some organization or agency down the line will have to do this when it becomes completely unmanageable on the river, and current negative impacts continue to the point of serious damage that nobody can any longer ignore. Both your a specific plan on use, access assessments and formal river management planning does not occur, more problems and impacts will occur on this section of river and the public parcels of land, and the ability to regain order and turn this mess around will slip farther away. The proposed "out and out" alternatives in your document show a huge lack of taking responsibly on your part. Merely passing the buck to some other poor slob, is not what good public stewardship is about.

11 10. You have incredible opportunities at this time to improve the river experience for river users. Please consider management implementation of things the public currently desires such as: providing more river access points to spread use and people out, the providing things like camping opportunities and rental sites (which currently are not provided on any section of this river in Wyoming), and employing personnel to keep the peace on ramps where verbal and physical fights are frequent. Your document reveals that you have no idea what the actual use levels, both commercial and noncommercial, are on this section of river, nor have you even taken the time to observe how this use moves down the river or what people feel about their experience. Your failure to even care enough to look at this issue and work with the public is very apparent, and tragic. Please do what is right, and follow your missions beyond where the line where is says you can dispose of useless property.

12 11. Shifting land ownership to the Land Trust who will only be working with their wealthy benefactors is wrong. If some land is going to end up in private hands, making wealthy landowners wealthier is not what the rest of the tax paying public desires. Before any lands are considered for transfer, you need to do a thorough analysis of the highest and best use of these parcels. Taking the first proposal that comes through the door that you can make money on

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7 6. It appears at this time that you nor other groups with big plans for the river have not adequately studied or drawn up adequate plans to implement any possible alternative. We will not endorse any plan that does not speak to how every aspect of every alternative will be managed in the future. At this time, you nor the county or JH Land Trust are able to answer questions relating to how use will be managed in the future, how public access will be maintained, how the management planning for this section addressing the high levels of use will be completed, who will manage the commercial use on the public access, what guarantees there will be that access will not become a prohibitively high priced fee proposition that keeps the public from being able to afford to use the river or their public lands, what are the current and future impacts of the levels of use on the river or the river system and wildlife, etc. Your failure to do this research is appalling, and nothing should move forward until everything is adequately addressed and you can make guarantees on these issues into the next few decades.

8 7. You must not take any management options that are based on profit motives! Doing this is not what you have been charged to do in public management, nor is that your only solution! Anything that requires transfer of public lands to any organization must be a public process, and should not be considered if a profit motive is required regardless who the proceeds are given to in hopes of making this crime appear aboveboard. These lands should, now and in the future be for all the American people. The JH Land Trust proposal will solve many of your problems as an agency, but you will be serving only the super wealthy of Teton County at the expense of the common taxpaying citizen. This must not happen. You need to go outside the box and search for every possibility and group that would be willing to help with the management without needing to make a few million off their proposal. The Land Trust only offers pure parcel management. It would be much less expensive and public lands would not be lost if you merely placed your parcels with a local real estate management agency as if the parcels were merely open condominiums or this proposal makes them look.

9 8. There are river management programs upstream of you in the park, downstream on the forest, and further downstream below the dam by the Idaho BLM. Obviously, savings can be realized by working with other programs that have existing management infrastructure in place. I have called both the Forest Service and the Idaho BLM and found out that you have never come forward with any type of co-management proposal beyond trying to pawn the parcels and the 40 years of problems you have created by not doing your job, onto other agencies with little money to adequately manage what they currently have. This does demonstrate your willingness and ability to make us

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would be a travesty. I know there has been very little public participation in this latest process put on by your agency. That is very likely due to how many times you have held meetings and made moves like you might actually step up to the plate and follow your agency's management guidelines. The reality in Teton County is that many people are very interested in what becomes of the river and their public lands. You have merely lured people into believing that no matter how many meeting they attend, or how many thoughtful letters they write, that nothing will ever get your offices into formal river management actions. Many people complain a great deal. You have left most of the public believing any participation is futile, and nothing can be done to get you to not sell their lands to save your agency the trouble of doing what they are paid to do. The lack of federal funding affects all agencies. Not having the money needed to do the job well is also a problem the National Park Service and the Forest Service both suffer from. They both still do their best to manage their lands and rivers in spite of those barriers. The Forest Service has gone as far as working with the river community to procure private donations to make things happen. Neither agency has ever merely tried to give land and rivers away to whomever will take it and run away from the issues as you have over the years. You should be too embarrassed to be trying these underhanded things! You look that much worse when other federal agencies continue to do what they are mandated to regardless of budget problems, while Pinedale BLM really has not ever even tried to

13 12. As more and more information is reaching river users about your unannounced close-door meetings with the JH Land Trust, you will find that there is a large amount of interest in the river and what happens to it. Even though citizens that quit coming to your public meetings years ago because they tired of listening to empty promises and management inaction, I promise there will now be a very concerned group of people who will take notice in your process and decision making.

In closing, please do not make any such decisions about absolving yourself of being land managers in Teton County, WY. Please extend your comment period to allow
14 the public to let you know how they feel about the Land Trust's 11th hour plan. Spend the time needed to do a real analysis that considers the health of the river as a whole and each individual parcel, evaluates the fish and wildlife concerns in the corridor, deals with management prescriptions at access point on the river that set allocations and implements a permit system needed to provide great experiences for all river users and protects all natural resources and public lands and river access under your care and on the river.

Sincerely,

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Kip Worthington

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JACKSON HOLE LAND TRUST

public cost, and we believe that it should be considered as a possible alternative for the BLM.

The JHLT looks forward to working with the BLM in the future as you implement your Resource Management Plan for the Snake River.

Thank you for your consideration of our comments.

Sincerely,

Leslie Mattson
Executive Director

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JACKSON HOLE LAND TRUST

May 16, 2003

Ms. Kellie M. Roadifer
Planning & Environmental Coordinator
Bureau of Land Management
P.O. Box 768
Pinedale, WY 82941

Re: Snake River Resource Management Plan DEIS dated January 2003

Dear Ms. Roadifer:

I am writing on behalf of the Jackson Hole Land Trust (JHLT). The JHLT has reviewed the DEIS referenced above and supports the "Preferred Alternative," subject to the following comments.

Over the past several weeks the JHLT has discussed an idea for implementation of the Preferred Alternative with a number of different individuals and organizations in Teton County. The concept includes the possibility of the JHLT purchasing some of the BLM parcels, subject to restrictions on development of the parcels and provisions for continued public access.

Our concept includes provisions for the resale of some of these parcels to private individuals. Such sales would be made subject to the terms of the BLM conveyance and perpetual conservation easements to be retained by the JHLT insuring preservation of the wildlife, scenic and public recreational values of these lands. Our idea is that the Grand Teton National Park, Teton County and the JHLT could share the proceeds of these sales for conservation work in Teton County. Implementation of this concept could also generate funds to the federal treasury.

While many of those with whom we spoke were supportive of this concept, others raised understandable concerns about the potential for change in ongoing uses of these lands. The JHLT shares these concerns and supports continued public access and use of these lands in a manner that is consistent with their unique natural values.

1 The Preferred Alternative specifically includes the possibility of transferring of some of the lands to private, non-profit land preservation entities (such as the JHLT). The JHLT believes that the BLM's final decision should allow for the sale of appropriate parcels by a land trust to private owners, subject to land conservation easements insuring public access and the preservation of natural resources. The JHLT recognizes that not all of the BLM parcels [illegible] managed in this fashion; however, allowing some private ownership as described offers important opportunities for public benefits with [illegible]

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jimstanford@earthlink.net
05/20/03 08:05 PM

To: jmsdbb_wyoal@blm.gov
cc:
Subject: Snake River RMP

To whom this may concern,
Hi, my name is Jim Stanford, and I am a Jackson resident concerned about the future of BLM parcels along the Snake River.
I urge the BLM to find the best way to preserve these lands for their scenic, wildlife and recreation value. The Snake River corridor through Jackson Hole is one of the most spectacular stretches of riparian habitat in America, and the BLM should do everything in its power to keep the corridor as pristine as possible.
1 Under no circumstances should these parcels be sold to adjacent landowners or developers. Keep the snake away from the Snake, and keep the Snake natural and free. And, please, keep public lands in the public's hands.
2 "Improvements" should be kept to a minimum. Boat ramps and toilets on Wilson and South Park, and perhaps an overnight camping site or two are needed. The
3 proposal to relocate the Moose Park boat ramp to the opposite bank of the river, on a BLM parcel, is a smart idea.
Thank you for considering my input.
Sincerely,
Jim Stanford

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
999 18TH STREET - SUITE 300
DENVER, CO 80202-2466
Phone 800-227-8917
http://www.epa.gov/region08

Ref: 8EPR-N May 15, 2003

Priscilla Mecham, Field Manager
Snake River Resource Management Plan
Bureau of Land Management
Pinedale Field Office
P.O. Box 768
Pinedale, Wyoming 82941

Re: *Draft Environmental Impact Statement for the Snake River Resource Management Plan* January 2003; 1610 (930) Snake River RMP

Dear Ms. Mecham,

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Region 8 Office of the United States Environmental Protection Agency (EPA) has reviewed the *Draft Environmental Impact Statement (DEIS) for the Snake River Resource Management Plan (RMP)*, dated January 2003. Section 309 of the Clean Air Act directs EPA to review and comment in writing on the environmental impacts of any major federal agency action. EPA recognizes the effort and resources that are committed to the preparation of documents of this nature and hopes to facilitate the NEPA process with general comments described below and additional enclosed comments. It is our intent to identify and provide information on issues which EPA believes should be further considered and potentially addressed in the Final EIS.

EPA recognizes the value of developing a RMP for the Snake River planning area and agrees with the overall goals of the preferred alternative to manage land uses for public access, recreation use, open space, and wildlife habitat. The chosen alternative for the RMP will outline the first management approach for BLM-administered public lands in the Jackson Hole area. Given the ever-increasing pressures on resources in the planning area, it is critical that the BLM take every opportunity to improve or recover stressed ecosystem components. Development of an RMP for the Snake River puts the Bureau of Land Management (BLM) in a unique position to establish a renewed effort to address environmental impacts to the river's aquatic and riparian ecosystems. Improved conditions will greatly improve the resiliency of the ecosystem to provide for increasing demands of flood plain resources.

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fully assess environmental impacts. We have enclosed a summary of EPA's ratings criteria and definitions.

We are enclosing additional general and specific comments regarding this DEIS for your consideration to assist BLM in preparing a document that meets the full intent of NEPA, and that results in the best decision possible to protect the environment. If you have any questions concerning these comments, please contact Peter Ismert at 303 312-6215 or ismert.peter@epa.gov.

Sincerely,

Cynthia Cody
Director, NEPA Program
Office of Ecosystems Protection
And Remediation

Enclosures

The DEIS indicates that the Snake River is not at proper functioning condition (PFC). The complexity of the river system and its impacts require that a single restoration strategy for the entire river segment is needed to eventually improve the condition of the BLM-administered parcels. While EPA recognizes the multiple use mandate on BLM-administered lands, our comments on this DEIS are mainly targeted to ensure that this RMP results in ecological sustainability while meeting multiple use objectives. If ecosystem functions are not maintained, many of the resources that draw the public to visit the BLM parcels or that are used for development purposes may become further impaired or lost altogether.

Governmental and non-governmental entities are initiating collaborative watershed restoration efforts for the broader Snake River Watershed, with the Teton Science School acting as the initial convener of the collaborative process. This initiative is just beginning and BLM could participate to help address snake river restoration needs. Within this context, EPA
1 recommends modifying the preferred alternative to indicate that BLM retain the parcels and work with other Federal agencies (such as the U.S. Army Corps of Engineers), adjacent landowners, local governmental agencies, and non-governmental organizations to develop a corridor-wide management plan (please see the enclosed General Comment #4 for further explanation). Such a plan should be developed that meets the following criteria: 1) assures long-term public ownership of all parcels, 2) contains specific actions to restore losses in ecosystem functions, 3) identifies resources to implement land-use management and needed restoration activities, and 4) was developed through a comprehensive planning process with broad stakeholder input. This would alleviate the problem of managing disconnected parcels and could bring about a greater chance for system-wide environmental improvements and movement toward PFC.

2 A less desirable, but improved, option for inclusion in the Preferred Alternative would be to defer the decision to dispose of the parcels, and to which entity, until it is evident that a landownership adjustment would offer the best opportunities for implementation of a multi-agency/stakeholder management and restoration plan described above. Landownership of the BLM parcels should become a mechanism to achieve planned goals of a broadly developed plan.

Transfer of the parcels to another entity prior to the development of a specific management and restoration plan would only transfer the unsolved management issues to a different organization. The Preferred Alternative presently indicates that the receiving entity will
3 have few restrictions in managing the land uses, as long as the basic requirements of public access, open space, and wildlife habitat are met. These requirements are very general and if solely relied upon, could lead to unanticipated environmental degradation.

Based on the procedures EPA uses to evaluate the potential effects of proposed actions and the adequacy of the information in the DEIS, EPA will rate this DEIS in the category of EC-2 (Environmental Concerns - Insufficient Information). This rating means that the EPA review has identified environmental impacts that should be avoided in order to provide adequate protection for the environment, and that the DEIS does not contain sufficient information to

ENVIRONMENTAL PROTECTION AGENCY REGION 8
COMMENTS ON
DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR THE SNAKE RIVER RESOURCE MANAGEMENT PLAN
JANUARY 2003

General Comments

2 1. One of the four Planning Issues identified in the DEIS is landownership adjustment. This planning issue is important from a environmental perspective because landownership changes can bring about varying levels of environmental impacts. The Preferred Alternative focuses on this issue by transferring the BLM-administered parcels in the planning area to a Federal, state, or local governmental agency, or non-governmental entity to carry out future land-use management activities. With the different types of ownership possibilities comes the potential for different resource-use management approaches and environmental outcomes. The Preferred Alternative indicates that management agreements, easements, or other institutional controls would be put in place prior to sale, exchange, or transfer. These mechanisms should be evaluated for their ability to withstand legal challenges or changes in land-use codes. Local land-use management principles could eventually override these controls to meet other unforeseen needs, changing the expected environmental impacts. BLM should further evaluate potential environmental effects of landownership adjustments.

4 2. The DEIS indicates that management of the parcels is difficult because of the sporadic location of the parcels within the planning area. Management of resource uses and land use practices is difficult for smaller, unconnected parcels of property, like the BLM-administered parcels, particularly within an active river system like the Snake River. Disposal of some or all of the parcels would lead to even more disconnected ownership patterns, particularly if several entities acquire different BLM parcels.

5 3. Given the likely monetary value of the lands, it is unlikely that a single organization would purchase the parcels, even at a somewhat reduced price. If a single organization was able to obtain the parcels, its ability to dedicate resources to manage the uses of the parcels should be evaluated prior to alternative selection. Local governments have ability to manage land for public use and environmental benefits, but information on this in the DEIS is lacking.

6 4. EPA recommends that BLM retain the parcels and manage the lands in partnership with local governments and non-governmental entities as cooperating partners. A watershed approach effort being initiated by the Teton Science School, which is focusing on networking and environmental education, may provide a good mechanism to explore potential partnerships. A successful example of this is the Arkansas River Headwaters

Recreation Area (AHRA) in central Colorado. BLM, the Colorado Division of Parks and Outdoor Recreation (CDPOR), the USDA Forest Service (FS) and the Colorado Division of Wildlife (CDOW) entered into a cooperative management agreement to establish a partnership between the entities for the management of the public land resources in the Arkansas River corridor. In addition to the responsibilities each agency has for the lands they own, the BLM and the CDPOR are the lead agencies responsible for the management of recreation within AHRA. CDPOR provides the overall processes and "lead" agency responsibility in managing recreation activities on the public lands and waters within the AHRA. BLM continues to manage all resources in the AHRA, other than recreation, on BLM-administered lands within the AHRA. The partnership maintains a Citizens Task Force sponsored by the Colorado Department of Natural Resources comprised of no more than 14 members to serve as representatives of seven public interests.

Although the landownership patterns may be different in the Snake River corridor, this partnership provides an excellent model of how different entities can work together to meet multiple goals and objectives. BLM should evaluate this approach for applicability to the Snake River corridor. It provides an alternative to disposing the parcels outright in the preferred alternative and provides a framework for managing the lands in other alternatives as appropriate. For more information about the cooperative management agreement, please view the following website:
http://www.parks.state.co.us/akhamm/management.asp

Specific Comments

7 1. **Purpose and Need, Page 2:** The overall purpose "... is to provide comprehensive and environmentally adequate framework for managing and allocating uses of the BLM-administered public land and resources..." As indicated in the DEIS, the Snake River is an environmentally degraded system and is not at its "proper functioning condition" (PFC). Because the Snake River is the Jackson Hole area is a nationally-recognized and environmentally unique river, the purpose and need of developing the Resource Management Plan (RMP) should include identifying and minimizing impacts to the river system. Given impacts from the levees, PFC may never be reached. However, actions should be included that would move the condition toward PFC. The alternatives in the Draft Environmental Impact Statement (DEIS) should have been developed under the concept of managing land use activities and implementing restoration activities to focus more on improving the environmental condition of the Snake River. This would include stating actions in the alternatives designed to improve, to the extent possible, degraded ecosystem functions.

8 2. **Planning Issues, Page 4:** Uses of the river system depend upon the quality and the resiliency to withstand use. Because of this, maintenance and improvement of the environmental conditions should be considered as a separate planning issue.

typical of an functioning flood plain, rather than isolated mitigation measures that produce static artificial wildlife habitat.

13 7. **Table 2-1, Comparison of Alternatives:** The first column in this table is titled "Land Use or Resource". Separate sections about flood plain habitat types and functions should be included under this title. Sections currently exist titled "Watershed Management" and "Wildlife and Fish Habitat Management", but these sections are broad and don't allow for differentiation between habitat types that would likely be affected. For example, aquatic habitat is an important component of the flood plain ecosystem and is not adequately covered in this section. Habitat types that could be evaluated separately include aquatic, riparian, upland, backwater, deep water, flood plain wetlands, sidechannels, etc. The effects to these habitat types evaluated in the environmental consequences section (Table 4-2) or some similar system effects analysis impact the dynamic maintenance of the biotic types.

14 8. **Table 2-1, Page 21:** The description of the preferred alternative on this page of the table indicates that conservation easements would be used where appropriate. However, in Table 4-1, page 87, the corresponding section indicates that conservation easement would not be likely. These sections should be checked for consistency. Please see General Comment #1 and the comment about landownership adjustment criteria in the cover letter for additional recommendations.

15 9. **Table 2-1, Page 21:** The last row in the table on this page discussed designation of the corridor as a Special Project Area to allow for use of the Land and Water Conservation Fund. It seems appropriate that any alternative that does not dispose of all land, or has options for retaining land (including the preferred alternative) should include this action.

16 10. **Table 2-1, Page 24 and 36, Livestock Grazing Management and Vegetation Management:** Cottonwood regeneration should be a primary goal for maintenance of the remaining riparian functions and habitat diversity. Because of the levee system, limited cottonwood regeneration is occurring. BLM should evaluate the remaining cottonwood regeneration potential within the corridor and develop actions to promote regeneration, or at least reduce impediments to regeneration. One example would be to manage grazing so that cottonwoods would have a greater chance of survival. This could mean allowing grazing to occur only in areas where cottonwoods are not likely to germinate.

17 11. **Table 2-1, Recreation Management, Page 33:** The Preferred Alternative discusses the actions under the Recreation Management category. Several of the actions defer the management decisions to the land receiving entity. This provides uncertainty in determining environmental effects. An analysis of environmental impacts can not be adequately understood until recreation management plans are developed. BLM should attempt to identify the general scope of such plans to help determine environmental impacts.

Environmental protection and restoration should be an underlying theme across all alternatives, regardless of the predominant land-use approach.

9 1. **Planning Issues, Landownership Adjustment, Page 3:** This planning issue seems out of place in the document. Landownership would be more appropriately introduced in the description of alternatives since it is a mechanism to achieve a desired outcome. Emphasis on determining which entity should own the land detracts from the purpose and need of how activities on the land should be managed. Landownership is important, but it is "means to an end", not necessarily an "end" itself.

Landownership is an important indirect environmental stressor that should be evaluated in the alternative analysis. For example, the levees were installed to protect private land from flooding. An increase in the amount of private land in the flood plain area would increase the future demand for construction of additional levees or maintenance of existing levees toward further constraining the river channel.

10 4. **Criteria for Analyzing Environmental Consequences, Page 6-7:** Understanding riverine flood plain functions and characteristics are important when discussing the environmental condition of river systems. Flood plain functions typical of northern Rocky Mountain river systems include: surface-groundwater storage and flow; nutrient cycling; retention of organic and inorganic particles, obligatory plant communities, aquatic invertebrate food webs, and vertebrate habitats; and flood plain interaction and connectivity. Evaluating alternatives against important functions and characteristics would provide a better analysis of environmental consequences. A good reference resource for understanding and assessing flood plain functions is "A Regional Guidebook for Applying the Hydrogeomorphic (HGM) Approach to Assessing Wetland Functions of Riverine Floodplains in the Northern Rocky Mountains", August 2002, by the US Army Corps of Engineers. This document can be found at:
http://www.wes.army.mil/el/wetlands/pdfs/wrp02-21.pdf. Although performing an HGM assessment at this stage in the RMP process may be difficult to complete in a timely fashion, this document provides useful information about evaluating effects on important flood plain functions.

11 5. **Criteria for Selecting the Preferred Alternative, Page 7:** This section lists the criteria to guide the selection of the preferred alternative. Because environmental condition is a primary consideration in selection of land-use activities, it would be appropriate to include the ability of the alternative to restore degraded riverine functions or other important environmental outcomes that can be accomplished.

12 6. **Alternative Formulation, Page 8:** An active approach to move the condition of the riverine system toward PFC should be included in the preferred alternative or evaluated for use in one of the other of the alternatives. Alternative C emphasizes environmental benefits through land use restrictions, but does not include direct restoration activities. The best restoration activities would be ones that begin to restore ecosystem function

18 12. **Table 2-1, Fish and Wildlife Habitat and Management, Page 39:** 1) The Preferred Alternative describes habitat improvements as the goal of the management action. This will hide odd or improve habitat issues. A reasonable improvement to the Preferred Alternative and Alternative C would be to address the improvement of flood plain functions. Some of these functions are identified in Specific Comment #4. It is understood that the levee system is the primary stressor to the these functions. However, the alternatives would be improved by including a management approach that identifies these shortcomings and sets actions and goals that would improve the existing condition. Table 4-2, Comparison of Environmental Alternatives, could subsequently contain environmental effects of each alternative on the important flood plain functions. 2) The

19 description of the Preferred Alternative and Alternative C indicate that the acquiring or receiving entity would "make decisions regarding actions necessary to maintain wildlife habitat." This provision is mainly for addressing environmental impacts. Managers should be made to determine future wildlife habitat decisions to better understand the environmental consequences.

20 13. **Page 51, Vegetation, Condition and Present Use:** This section describes the vegetation condition within the Snake River corridor. It would be helpful to include more information about the vegetation trends based on responses to the post-levee geomorphological regime. This would be useful for determining how each alternative would affect these trends, either positively or negatively.

21 14. **Page 75, Wildlife and Fisheries:** Additional descriptions are needed for the trend in the condition and amount of flood plain wetlands, connected and disconnected backwaters, side channels, and oxbows. Once this information is included, the alternatives could be developed to improve the condition and restoration system functions that maintain or create (within the constraints of the levee system impacts) these resources.

22 15. **Table 4-2, Page 90:** Table 4-2 describes the environmental consequences of the alternatives by land use or resource use type. For some of the categories, the consequences described are impacts to the land or resource use, not necessarily environmental consequences from the use itself. However, these sections provide a better description of how the alternative would be implemented.

Other sections in the table, such as vegetation, visual resources, watershed management, and wildlife/fish habitat management begin to specifically address environmental consequences. When selecting the final alternative for the RMP, these latter sections should be relied upon when weighing environmental impacts of each alternative.

23 16. **Table 4-2, Page 140:** The first row in the table on this page discusses environmental consequences of landownership changes. The analysis in this category could be expanded for the alternatives where the property will be disposed. Ownership changes bring about different management approaches, causing different environmental impacts.

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For example, selling property to private individuals would most likely increase home construction, judging from existing practices on private land in the planning area. The environmental impacts of how a receiving entity will use (or manage the uses of) the land should be better evaluated.

24 17. **Cumulative Impacts of the Alternatives, Page 154, Second paragraph:** 1) The second paragraph on this page indicates that the BLM-administered parcels only cover less than 10% of the length of the Snake River between Grand Teton National Park and the South Park Bridge. It is unclear if this equates to the amount of 'between the levees' riparian area or if this amount refers to the total land in the planning area. On May 31, it appears the BLM-administered land is greater than 10% 'between the levees'. The land between the levees is of focus here because it is a different environmental resource from the land outside the levees and seems to warrant a separate discussion.

25 2) This paragraph seems to discount the incremental effects of resource-use management on the BLM parcels. The effects from each incremental impact are considered together to understand the cumulative impact. Each alternative should be evaluated under this concept. For example, Alternative D indicates that all parcels will be disposed of without management restrictions. Sale of land to private individuals would result in more homes being built within the planning area. The environmental effects of these additional homes should be evaluated as an increase in effects from existing homes in the planning area. Reasonable assumptions could be made on the desire to build additional homes on the disposed of property.

26 18. **Cumulative Impacts of the Alternatives, Page 154:** This section contains the cumulative impacts analysis for each alternative. However, for each alternative, very little analysis of environmental impacts exist. Most of the writeup for each alternative is about how various resources will be used or the land-uses will be managed. Actions within each alternative should be evaluated to determine if incremental impacts are contributing to overall cumulative impacts from other land-use management practices within the planning area, particularly within the riparian corridor. Small incremental impacts could be significant depending on the importance of the overall cumulative effect and should be considered during final alternative selection.

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GAME PRESIDENTIAL
GOVERNOR

STATE OF WYOMING

EAST CAMPUS
CHEYENNE, WY 82002

OFFICE OF THE GOVERNOR

May 15, 2003

Snake River RMP
Kellie Roadifer, Team Leader
Pinedale Field Office
P.O. Box 768
Pinedale, WY 82941

Re: Snake River Resource Management Plan DEIS
State Identifier Number: 1999-164

Dear Ms. Roadifer:

This office has reviewed the referenced Draft Environmental Impact Statement on behalf of the State of Wyoming. This Office also distributed the referenced document to all affected state agencies for their review, in accordance with State Clearinghouse procedures. Attached are comments from the Wyoming Game and Fish Department, State Historic Preservation Office and the Department of Agriculture.

The State of Wyoming has no objection to the proposed preferred alternative provided the attached agency comments receive your due consideration.

Please continue to provide this office with either (4) four hard copies or electronic copy (submit to SPC@state.wy.us) of continued information for review and distribution to interested agencies. Thank you for the opportunity to comment.

Sincerely,

Tracy J. Williams
Policy Analyst

TJW
Enclosures (3)

Wyoming Game and Fish Department
State Historic Preservation Office
Department of Agriculture

TEL 777-7434 PHONE (307) 777-7434 FAX (307) 632-3909

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U.S. Environmental Protection Agency
Rating System for Draft Environmental Impact Statements
Definitions and Follow-Up Action*

Environmental Impact of the Action

LO -- Lack of Objections: the Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC -- Environmental Concerns: The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO -- Environmental Objections: The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU -- Environmentally Unsatisfactory: The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 -- Adequate: EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 -- Insufficient Information: The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 -- Inadequate: EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment, February, 1987.

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WYOMING
GAME AND FISH DEPARTMENT

"Conserving Wildlife – Serving People"

May 5, 2003

WER 0611
Bureau of Land Management
Pinedale Field Office
Draft Environmental Impact Statement
Snake River Resource Management Plan
State Identifier Number: 1999-164

Office of Federal Land Policy
Herschler Building, 1W
122 W. 25th Street
Cheyenne, WY 82002

Dear Sir/Madam/Staff:

The staff of the Wyoming Game and Fish Department has reviewed the Draft Environmental Impact Statement for the Snake River Resource Management Plan within the Pinedale Field Office area. We offer the following comments.

Terrestrial Considerations:

1 We support the preferred alternative to transfer parcels to another public land management agency or private non-profit land preservation entities. As we stated in our previous letters dated January 28 and May 31, 2000, the Snake River Corridor is a valuable wildlife and habitat resource, and is also important for public access.

From a habitat perspective, the BLM parcels along the Snake River Corridor from Grand Teton National Park to South Park Bridge are extremely important habitat for many wildlife species, including bald eagle, peregrine falcon, trumpeter swan, osprey, moose, elk, and mule deer. Various parcels provide critical winter ranges, nest sites, and foraging areas for these wildlife species. If these parcels were placed in private ownership, they would likely be developed within a very short time, resulting in the irretrievable loss of these habitat values. These parcels also provide important public access points and easements to the Snake River for recreation, boating, fishing, hiking, and photography.

2 While we support the preferred alternative, we have concerns regarding the language in the Draft Environmental Impact Statement (DEIS) relating to the future management of wildlife habitat on these parcels. For wildlife and other resource impact analyses, the DEIS assumes that "the entities acquiring these parcels or taking over management responsibility would be obligated under the terms of the transaction to apply management prescriptions to maintain them

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Sir/Madam/Staff
May 5, 2003
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[illegible] wildlife habitat" (page 2). On page 134 under Cumulative Impacts on the Alternatives, it is stated "While no specific restrictions for management would be placed on the parcels as they are transferred, acquiring agencies or entities would be required to manage the parcels to preserve public access, recreation use, open space, and wildlife habitat values."

If the parcels were transferred to public or other entities without specific restrictions tied to wildlife and public values, the transfer may have serious consequences for wildlife. It is difficult to determine how future transactions might affect wildlife within the context of this document. For example, under "Actions common to all alternatives" for BLM-designated sensitive species, it is stated: "the appropriate mitigation would be applied to prevent unnecessary and undue degradation. Mitigation would be consistent with the accepted management objectives and best practices for managing these species, where known." (DEIS, Table 2-1, page 16). The statement that appears in Table 2-1, Comparison of Alternatives (page 40), seems to contradict this by stating "The acquiring or managing agency or entity would make decisions regarding actions necessary to maintain wildlife habitat." Also, under Wildlife and Fish Habitat Management in Table 4-1 (DEIS, page 96), the assumption for analysis under the preferred alternative states: "The lands would no longer be subject to the Wyoming Standards and Guidelines after transfer or sale."

3 We recommend the Final EIS (FEIS) adopt specific restrictions for each of the 23 BLM parcels, in order to protect specific existing values. Some of the parcels have extremely high value for wildlife due to their size, diversity of habitat, location in relation to bald eagle nests, use as trumpeter swan wintering habitat and ungulate migration routes or winter ranges while other parcels have high recreation value and human use. By rating each parcel as to its highest and best value, the FEIS could clearly identify the best future management option for each parcel.

4 Environmental consequences listed for Wildlife and Fish Habitat are listed on pages 136-155. Some of these are beneficial and some are adverse to wildlife, and it is not clear how the preferred alternative will affect wildlife on the specific parcels over time.

5 In Chapter Three (Affected Resources), the DEIS states incorrectly that winter habitat for trumpeter swans is primarily located downstream from the Wilson Bridge. Trumpeter swans also winter north of the bridge, with an especially important concentration in BLM parcel # 7 at the confluence of the Gros Ventre and Snake Rivers. Our Department has designated the entire stretch of the Snake River from Moose south as trumpeter swan wintering habitat.

6 Information on the bald eagle should include that active nest sites occur on or adjacent to many of the BLM parcels. Also for bald eagle, the BLM Mitigation Guidelines for Surface-Disturbing and Disruptive Activities (Appendix 2, DEIS) state that the seasonal restriction for important raptor and grouse nesting habitat is February 1 to July 31. As the bald eagle is the most important raptor nesting along the Snake River corridor in Teton County, seasonal restrictions in the Greater Yellowstone Bald Eagle Management Plan (Greater Yellowstone Bald Eagle Working Group, 1995 update) should be incorporated for managing eagle nests in the

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Wyoming

Wyoming Department of State Parks and Cultural Resources
State Historic Preservation Office

[illegible]
Barrett Building, 3rd Floor
Cheyenne, WY 82002

(307) 777-7697
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April 16, 2003

Office of Federal Land Policy
Herschler Building, 1 West
122 West 25th Street
Cheyenne, WY 82002-0600

RE: OFLP Project ID#: 1999-164, BLM-Pinedale, Snake River Resource Management Plan (RMP), Draft Environmental Impact Statement (DEIS), Teton County. (SHPO File # 01R0010LC003)

Dear Sir or Madam :

We have reviewed the referenced document as requested by your transmittal letter of Feb. 14, 2003 (comment deadline May 5, 2003) and offer the following comments.

12 Cultural Resources, in accord with the National Historic Preservation Act (NHPA) and other related laws and regulations, are adequately addressed under all of the proposed Snake River RMP alternatives. However, alternatives "C" or "E" (reference DEIS pp. 15, 17 & 18) appear to be most in accord with the spirit and objectives of the NHPA.

Please refer to the above SHPO project control number R0010LC003 in future communications dealing with this project. If you have questions, please do not hesitate to contact Robert York of our staff at 307-742-3034, or me at 307-777-6311.

Sincerely,

Judy K. Wolf
Review and Compliance Program Manager

Dave Freudenthal, Governor — John T. Keck, Interim Director

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Sir/Madam/Staff
May 5, 2003
Page 3 – WER 9661

Resource Management Plan. Within Area 1 (delineated portion of the recreation zone), human activity should be minimal from February 1 through August 15, or two weeks following fledging.

Aquatic Considerations:

7 The Department's concern that public use and access be maintained has been addressed in the Preferred Alternative of the Draft Environmental Impact Statement (DEIS). Disposal to other agencies, jurisdictions, and non-profit preservation entities would probably be the best avenue to retain this use.

Additional aquatic comments pertaining to the DEIS are:

8 Page 41, Table 2-1 Comparisons of Alternatives. We recommend that the last constraint referring to prohibiting surface disturbance during spawning also include prohibiting surface disturbance during egg incubation.

9 Page 43, 1st paragraph of Climate and Meteorology. Elevation should be used in conjunction with slope exposure, not altitude.

10 Page 55, 2nd paragraph of Minerals and Meteorology and repeated on page 57, 2nd paragraph of Geothermal. In reference to Boyles Hill and Abercrombie Warm Springs, ownership may be wrongly identified. Boyles Hill is now in private ownership, and Abercrombie's old Warm Spring Ranch is in Grand Teton National Park.

11 Page 81, 1st line, the Bonneville redside shiner is currently identified as redside shiner.

Sincerely,

BILL WICHERS
DEPUTY DIRECTOR

BW:TC:ae

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Wyoming Department of Agriculture

Dave Freudenthal, Governor
John Etchepare, Director

[illegible]

May 12, 2003

Lynn Simons
State Planning Coordinator
Herschler Building 1st Floor East
122 W. 25th Street
Cheyenne, Wyoming 82002

District 1
Ford Gardner
District 2
Helen Jones
District 3
Spencer Ellis
[illegible]
District 7
Arlene Brown

Dear Lynn Simons:

[illegible]
Resource Management Plan by the Pinedale Field Office of the Bureau of Land Management. (1999-164).

Our comments are specific to WDA's mission within state government which is to assist the citizens of Wyoming to live safe and healthy lives, promote and preserve our agricultural community, be responsible custodians of our natural resources, and achieve integrity in the market place. As this proposed project affects the welfare of our citizens, our agriculture industry, and our natural resources, we believe it's important that we be kept informed of proposed actions and decisions and that we continue to be provided the opportunity to express pertinent issues and concerns.

We support the preferred alternative, but with an important suggestion.

13 We agree with the justification of the BLM to transfer these scattered parcels of BLM lands along the Snake River to another public land managing agency within 15 years with the BLM retention of mineral rights. We also agree with their options of actual land surface being retained by the BLM if parties could be found to take over management of public uses of these parcels.

14 We especially understand the need that "entities acquiring these parcels or taking over management responsibility would be obligated under the terms of the transaction to apply management prescriptions to these lands, and maintain them for public access, recreation use, open space, and wildlife habitat." (p.9). However, we strongly recommend that this last phrase and similar phrases throughout the DEIS be slightly modified to read "...open space, livestock grazing, and wildlife habitat" in the Final EIS and in the final Snake River Resource Management Plan.
We believe the maintenance of livestock grazing on these parcels provides land managers an important additional tool and an added flexibility to better maintain the world-class natural resource values of this area.

The BLM officials acknowledge in several references in the DEIS the importance of retaining livestock grazing on these parcels. The Management Objective for Livestock Grazing Management on page 79 states "Maintain or improve conditions for the benefit of livestock use, wildlife habitat, watershed values and riparian areas." The Management Objective for Vegetation Management on page 57 states "Maintain or improve the diversity of plant communities to support wildlife habitat, watershed protection, scenic resources, and livestock grazing; control noxious weed infestations prevent their spread."

[illegible] — One mission is to assist the citizens of Wyoming to
live safe and healthy lives, promote and preserve our agricultural community, be responsible custodians
of our natural resources, and achieve integrity in the market place. [illegible]

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May 12, 2003 Page 2

page 118, under the Comparison of Environmental Consequences for Socio-Economics, the DEIS reports, " Given the importance of land disposal issues, protection of wildlife habitat, livestock grazing, minerals management, and the management of recreation to the Willingness to Pay considerations, ..."

This acknowledgment by the BLM of the importance of livestock grazing is appropriate. Livestock grazing possesses the ability, under proper management, to improve or enhance ecosystems as an integral part of these systems. Properly managed livestock and other agricultural practices can maintain or improve natural resources. Peer reviewed science and research has proven that proper grazing increases plant vigor, improves nutrient and water cycles, and is vital to the survival of plant communities. Plants have evolved with grazing. Grazing maintains a proper ecological balance by increasing plant diversity. Grazing exclusions statewide clearly illustrate that in the absence of grazing, plant communities become stifled, less vibrant, and slowly die out.

Livestock grazing can and should continue to be used on these parcels as a management tool. Livestock should continue to be used to improve natural resources on these lands just as fire, text, technology, and living organisms are used. Livestock can be moved on a periodic basis to these lands needing attention. Their early seasonal use can be beneficial to increase palatability, control undesirable plant growth, and decrease competition for other desirable plants. Increasing or decreasing their time of use can affect undesirable plant growth patterns. Heavier stocking rates can change plant competition and encourage desirable plant growth. They can aid the management with the removal of fine fuels. They can be strategically managed to obtain desired results. These livestock grazing capabilities enhance our natural resources and achieve management objectives.

The facts are that livestock have amazing abilities to achieve BLM management objectives. They can reduce wildfire potential. They can reduce the threat of undesirable plants and noxious weeds. They invigorate and diversify our environment. They are an important commodity that helps provide food and fiber for the people of our nation. That food and fiber is an important export to help feed and clothe the people of our world.

Just as important, grazing of livestock on these public lands allows deeded land ranching to survive and that brings in valuable dollars to our rural communities and ensures open spaces, scenic vistas, and the tranquility that's free of development.

Private land ranchers use public lands grazing as an essential component of the ranching operation. Their deeded lands provide indispensable wildlife winter habitat and forage, while also contributing to the preservation of open spaces, the visual beauty of the area, and the traditional image of the historic rural landscapes of Wyoming and the West. As noted on page 141 under Wildlife Habitat for the preferred alternative, "Landowner changes could adversely impact wildlife if there is a subsequent increase in human presence in areas previously excluding general public." The livestock grazing on these BLM lands allows the agriculture producer to continue to retain his deeded lands and thereby allows the ranchers to continue to provide increasingly valuable wildlife habitat, open spaces, and scenic vistas in this important valley.

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Page 4
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May 12, 2003 Page 4

As noted on page 87, under the preferred alternative, construction equipment would probably not be necessary as public utilities would agree to manage these lands according to BLM management prescriptions.

Sand and gravel mining wouldn't be affected, as these operations would be occurring after the grazing season had ended and the mining would be occurring between the leases. Also, because of the nature and extent of the lease system, the DEIS notes on page 138 that action taken on public lands will result likely have only minor impacts on the physical conditions and non-point source related quality.

The environmental and social values of livestock grazing are gathering growing significance. These values of visual scenery habitat for wildlife, the scenic vistas and the open spaces are becoming increasingly valuable as development destroys these values. The Jackson Hole valley has become a refuge for citizens from throughout our nation to escape over-development and to seek the tranquility and beauty of this area. Actions that remove livestock grazing from these BLM and deeded lands can, in turn, destroy or impair these increasingly desirable environmental and social values.

Decisions in the proposed plan should a few BLM officials, grazing permittees and company officials the opportunity to work cooperatively and the flexibility to make the best site-specific, case-by-case decisions that are in the best interests of the affected resources and citizens.

14 In recognition of the aforementioned advantages of livestock grazing, we generally support the preferred alternative, but with the understanding that contract requiring the BLM parcels or taking over management responsibility would be obligated under the terms of the transaction to maintain there for livestock grazing as well as for wildlife habitat, open space, public access and recreation use.

In conclusion, we appreciate the opportunity to comment on the DEIS, we encourage continued attention to our concerns and recommendations, and we look forward to hearing about the actions and decisions regarding the project.

Sincerely,

Mike Deberard
Director

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Page 3
DEIS - Snake River RMP
May 12, 2003 Page 3

The BLM notes repeatedly throughout the DEIS the significance of minimizing development and preserving wildlife and scenic values. They stress the critical importance of protecting eagles' nests and other habitat for sensitive species. Government land managers can and should have the flexibility of using all the necessary tools, including livestock grazing, to manage and protect these environmental values in this area. In turn, livestock grazing can be adjusted by these managers and grazing permittees to meet natural resource objectives.

Officials of the BLM officials acknowledge that the ability to modify livestock grazing is the preferred alternative on page 141 where they state, "adjustments to the levels of livestock grazing would be made as a result of monitoring and after consultation with grazing permittees and other affected interests (including local and state government entities, as appropriate." This statement provides a crucial advantage of retaining livestock grazing – the ability of the BLM range officials to work with grazing permittees to determine management strategies and to fulfill essential natural resource objectives on these lands.

Grazing permittees are intimately familiar with the area under study and possess irreplacable long-term, on-the-ground knowledge. They understand that it's in their best interests to continue to serve as stewards for both the BLM and deeded lands. They are particularly aware of the impacts upon wildlife and livestock habitat of proposed management strategies. They are capable and willing to help to determine and fulfill management objectives for the area.

15 Another recommendation. In the interest of providing the public land managers the maximum flexibility possible to manage these lands, we believe that the wording for Alternative A is preferred over the wording of the Preferred Alternative regarding parcels not currently leased of livestock grazing. Rather than closing these parcels for all future applications, as stated in the preferred alternative, we believe the applications to graze should be addressed on a case-by-case basis, as mentioned in Alternative A. There may be times when the public lands manager may prefer to use livestock grazing as a tool to control undesirable plant growth, reduce fine fire fuels, or, in other ways, enhance the natural resources of identified parcels. The wording in Alternative A provides that flexibility and should be used in the RMP.

There are other advantages to ensuring that livestock grazing is retained on these parcels.

The congressional mandates for multiple use, including livestock grazing, would continue to be met. Certainly, livestock grazing fits the definition of multiple use that's used in the glossary of the DEIS, "...making the most judicious use of the lands for some or all of these resources..." As noted in the definition, range is an important renewable resource that we believe helps meet the present and future needs of the American people, makes the most judicious use of these lands, and fits in with the harmonious and coordinated management of the resources of these lands.

The settlement judgment regarding the Wahat Ranch would continue to be upheld.

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Patrick Huber
721 E. 11th St.
Davis, CA 95616

Dear BLM:

1 I am writing in regards to the Snake River RMP. I would like to urge the BLM to retain parcels in question in public ownership rather than disposing of them to private buyers. The Snake River provides essential habitat for a number of species in the area as well as providing world-class fishing opportunities. These lands should be managed for their ecological attributes rather than for sand and gravel mining, oil and gas development, off road vehicle use, or other detrimental activities. Further, in response to
2 the contention that these scattered lands are difficult to manage, a concerted effort should be made to connect the parcels into a fully protected riparian corridor. In an era of rapidly diminishing natural areas throughout the West, opportunities such as this should be taken to preserve a little of what's left.

Sincerely,

Patrick Huber

RECEIVED
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AUG 19 2003
BUREAU OF LAND MANAGEMENT
JACKSON FIELD OFFICE

65

kahe@montana.edu (Ken A. Ahe)
09/13/03 09:08 AM

To: pinedale_wyoming@blm.gov
cc:
Subject: Keep Lands in the Snake River Resource Area in Public Hands

Nellie Roadifer
Snake River RMP Team Leader
U.S. Bureau of Land Management
Pinedale Field Office
P.O. Box 768
Pinedale, WY 82941

Dear Ms. Roadifer:

Thank you for providing this opportunity to comment on the DRMP for the Snake River Resource Management Plan.

The 1,873 acres of surface lands and 25,123 acres of federal mineral estate in the Snake River Resource Area provide critical fish and wildlife habitat, world-class river recreation, and include some of the most spectacular scenery in America. It is for these reasons that I strongly urge the BLM to maintain these lands in public ownership and not to sell them to a non-governmental organization or private interests.

2 These lands should be managed primarily for fish and wildlife and low-impact recreation, not for potentially damaging extractive activities such as mining, oil and gas development, sand and gravel extraction, grazing, and off-highway vehicle use.

3 Instead of disposing of these valuable lands, I would like to see the BLM consolidate them by designating a Special Project Area and working with local land trusts to establish a contiguous protected corridor along the Snake River.

Sincerely,

Ken A. Ahe
1519 Knarbough
Bozeman, MT 59715
kahe@montana.edu

66

Dmaynard@surfside.net (Richard P. Maynard)
04/13/03 11:21 PM

To: pinedale_wyoming@blm.gov
cc:
Subject: Keep Lands in the Snake River Resource Area in Public Hands

Nellie Roadifer
Snake River RMP Team Leader
U.S. Bureau of Land Management
Pinedale Field Office
P.O. Box 768
Pinedale, WY 82941

Dear Ms. Roadifer:

I am writing to request that you seriously consider my input regarding the Snake River Resource Management Plan.

Of particular importance is the remaining unspoiled fish and wildlife habitat. Man's history repeatedly destroys that which he yearns to own and use. Please do not sell or otherwise transfer the land, water, timber and/or mineral rights to any private concern.

2 Please manage these lands as wildlife habitat and wilderness recreation. No private financial enterprise should be allowed to be based in this area as it should be declared and managed as a contiguous Snake River protected corridor.

Please remember Aldo Leopold's words: "Wilderness is a resource which can shrink but not grow. It is only the scholar who understands why the raw wilderness gives definition and meaning to the human enterprise."

Sincerely,

Richard P. Maynard
131 Gyle Dr. #2
Chula Vista, Ca 91913
Dmaynard@surfside.net

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United States Department of Agriculture | Forest Service | Bridger-Teton National Forest | 340 N. Cache, PO Box 1888, Jackson, WY 83001-1888

File Code: 1530
Date: May 05, 2003

Bureau of Land Management
Pinedale Field Office
P. O. Box 768
Pinedale, WY 82941

Thank you for inviting the Bridger-Teton National Forest to comment on your planning efforts for Bureau of Land Management (BLM) properties located in Teton County, Wyoming. We continue to be interested in the Snake River Resource Management Plan since decisions to be made as a result will have a direct and potentially profound effect on National Forest lands downstream and the river corridor in general. Our comments on the draft management plan are focused on the preferred alternative.

You are aware that the section of the river in which the BLM properties are located has been found eligible for potential inclusion in the National Wild and Scenic Rivers system. Some of the BLM parcels have become established access points for river recreation. Some are highly visible to floaters and other users and therefore have value as part of the natural appearance and scenery of Jackson Hole. Many species of wildlife that depend on the river's riparian corridor also benefit from continued public ownership and management of these parcels. Each year the Snake River corridor becomes more popular and pressures on both public and private lands for recreation, wildlife use, scenic values, sand and gravel resources, and for high-end real estate continue.

1 We believe it would be in the best public interest to retain these lands in some kind of public ownership and we would offer to assist in a couple of ways, should you be interested in pursuing a collaboration among state, local, and federal agencies and other interested parties. We encourage the formation of some kind of task group to include local citizens, landowners, agencies, non-profits and elected officials, with the purpose of helping to craft a long-term plan for managing the BLM properties in question. There are many people in this valley who value the river and desire long-term access to its amenities, and whose years of experience would be helpful toward this effort.

2 In regards to the ultimate disposal of BLM lands in Teton County, it is conceivable that the Bridger-Teton National Forest could manage, in an interim or longer-term arrangement, some of the parcels in question. Teton County is another obvious public entity that is a good choice for eventual ownership and management of other parcels such as the gun club site and Wilson Bridge boat launch. Although the forest normally does not acquire land outside of its proclaimed boundary, it can be done with Secretary of Agriculture approval and we would consider such an arrangement if it appeared that it was the best way to retain and manage the land for public purposes. We could also participate in a multi-party land adjustment that would result in these parcels remaining in public ownership, although this entail a lengthy process.

Caring for the Land and Serving People

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Team Leader 2

In order to assure public access for recreation and management of these parcels into the future for attributes compatible with recreation and wildlife values of this potential Scenic River, we believe continued ownership by a local, state, or federal public agency is advantageous. We are willing to help however we can.

Sincerely,

Kniffy Hamilton

CAROLE 'KNIFFY' HAMILTON
Forest Supervisor

"Eric E. Simpson"
<ekz@tsi@pacificnet.net>
05/29/03 07:22 AM
Please respond to "Eric E. Simpson"

To: <pinedale_wyoming@blm.gov>
cc: "Don Barney UHF" <dbarney@blmnewys.org>, "The Simpson Ranch" <tsr@wyoming.com>
Subject: Snake River RMP - BLM Proposals Pending - Adjacent Owner Registration of Interest

Monday, 26th May 2003 PM C

Reference: Subject - BLM Parcel - "Rabbit Ear" Surrounded by The Simpson Ranch (TSR)

Dear BLM - Pinedale Office:

We just learned of your currently active study on the possible disposition of various BLM parcels on The Snake River and around the valley. As an adjacent owner, with you, we have been monitoring this for some years, as your files will show.

Unfortunately it appears we have missed your study's public comment time frame, but we again wish to update you on our contacts and register our interests via this e-mail.

I have also just viewed the mapped interactive web site showing these various BLM parcels.

We always welcome any contacts with BLM regarding this piece or other conservancy interest projects.

We actively help maintain various ditches, with Gene Linn, i.e. The Linn Ditch, Jarvis Ranch (now TSR) & Prosperity Ditch water rights, etc. and assist and work with the County and Army Corps and other property owners throughout the year.

We recently worked with Don Barney to improve the levee and fish spawning access, and other water features on our ranch and both up and down river. We are now working with Don and the Army Corp. to adjust levee easements to reflect these works.

Our property, owned by TSR Limited, of which I am the director, includes several small adjacent parcels, on the Snake River.

We also completely surround a very narrow BLM rabbit ear, connected into the Snake River.

For the web site map, your 'in the river bottom piece' is about 180 + acres. This rabbit ear piece however is a strip piece only about 30 feet wide, and there is no other access to this (your) piece, save for via the river, and that (if any) easement does NOT in that location allow access to the river via the levee.

In viewing the map, web site, it incorrectly shows Jarvis Lane with a dotted line to this BLM 'ear' piece, which is NOT correct as Jarvis Lane does NOT connect, but stops at another of our property lines much

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further back toward the highway, the Village Road.

We would greatly appreciate your keeping us directly updated on this study and your proposals, and providing your advice in ways we have we might help and work together.

I am scheduled to be at the ranch in mid-June. Telephone: 867 700 0168.

I would visit your offices say on Thursday or Friday, 19th or 20th June 2003 in your convenience.

We could then in person further review the above matters of mutual interest.

Looking forward to your reply, I remain,

Yours Faithfully,

Eric

Barbara & Eric Simpson
The Simpson Ranch
4812 Jarvis Lane
Wilson, WY 83014

TSR Limited, 11 Kotachi's Path, House III, The Peak, Hong Kong

E-mail: tsr@wyoming.com or ekz@pacific.net.hk

ekz/ce

TABLE A8-1
BLM RESPONSES TO COMMENTS ON THE DRAFT EIS

COMMENT NUMBER	RESPONSE
1-1	The Draft SRRMP does not address the allocation of commercial recreation use permits. With the transfer of management to another entity, the authority to issue permits would then be the responsibility of the acquiring management entity. BLM may, however, enter a cooperative agreement for management of recreation uses in the interim preceding parcel transfer.
2-1	The BLM does not have the authority to require the USFS to become the managing entity for public lands. However, the USFS could be a viable option for future ownership and/or management of the parcels.
3-1	BLM agrees that the lands should be maintained in public hands. The BLM Proposed Plan provides for the transfer of parcels larger than 1 acre to another public land managing agency, or to other public or government entities. The land managing agencies would be obligated under the terms of the transaction to apply management prescriptions to retain the lands, and maintain them for public access, recreation use, open space and wildlife habitat. Parcels less than 1 acre may be transferred to any interested agency or group or sold to private landowners. The Draft EIS did not identify specific entities to receive the parcels because none had yet been found. BLM's Proposed Plan emphasizes wildlife and wildlife habitat protection, particularly for endangered species.
4-1	Future owners of the parcels could erect signs to show where the parcels are located. See also the response to comment 5-1.
4-2	Due to the land values, staffing and the time involved in processing land transactions to consolidate the scattered parcels into 5 or 6 larger parcels, consolidation of the parcels is not practicable at this time.
4-3	BLM's Proposed Plan emphasizes wildlife and wildlife habitat protection, particularly for endangered species. The Proposed Plan also contains mitigations that would be applied if it becomes apparent that wildlife habitats are being damaged, such as changes to livestock grazing leases and limitations on the seasons and areas available for gravel extraction.
4-4	See response to comment 3-1.
5-1	Under the Proposed Plan, the entities acquiring the parcels or taking over management responsibility would be obligated under the terms of the transaction to apply management prescriptions to retain the lands, and maintain them for public access, recreation use, open space and wildlife habitat.
5-2	The Proposed Plan would transfer management decisions to the acquiring entity. Decisions related to the management of recreation use, including primitive camping, would be subject to the general objectives of maintaining access and recreation opportunities that are compatible with the protection of important wildlife habitat.
5-3	While the BLM does not have the authority to require the USFS to become the managing entity of BLM managed public lands, transfer of some or all of the parcels or their management to the Forest is a viable option.
6-1	See response to comments 3-1 and 5-1.
7-1	See response to comment 5-1.
8-1	See response to comment 5-1.
8-2	See response to comment 3-1.

COMMENT NUMBER	RESPONSE
9-1	The BLM's Proposed Plan is to dispose of the parcels to public land managing agencies, or to other public or government entities. Although BLM would not retain the lands, the entities acquiring these parcels or taking over management responsibility would be obligated under the terms of the transaction to apply management prescriptions to retain the lands, and maintain them for public access, recreation use, open space and wildlife habitat.
9-2	See response to comment 4-3.
9-3	BLM's interdisciplinary planning team did not find these areas to have relevant or important values necessary for ACEC status. However, conditions on the transfer of the parcels to other agencies will provide that the lands be managed for wildlife habitat, recreation, public access, and open space.
10-1	See response to comments 3-1 and 5-1.
11-1 11-2 11-3	The Proposed Plan would transfer this type of management decision to the acquiring entity. Decisions regarding the management of recreation use, including camping and posting signs on the parcels, would be subject to the general objectives of maintaining access and recreation opportunities that are compatible with the protection of important wildlife habitat.
11-4	Allowing the mining of gravel within the unvegetated river channel is the Proposed Plan. Thank you for your comment.
12-1	See response to comment 3-1.
13-1	See response to comment 3-1.
14-1	See response to comments 3-1 and 5-1.
15-1	See response to comment 5-1.
16-1	Thank you for your comment.
16-2	The BLM disagrees. We could conceivably transfer staff to Jackson, but it would not be "easily" done. While office space in Jackson could probably be found, workloads in the Pinedale Field Office are such that two or three staff positions cannot be spared to manage the Snake River lands. We have one recreation specialist, and that employee is currently heading 5 programs for the 928,000 acres of public lands in Sublette and Lincoln Counties that we manage from the Pinedale office. In addition, the budget for the Recreation program in Wyoming does not allow for additional positions to be hired to manage the Snake River lands.
16-3	The BLM does not intend to invest resources in the development of a Special Project Area. Our Proposed Plan is to dispose of the parcels to public land managing agencies, or to other public or government entities. Designating a Special Project Area, thus allowing Land and Water Conservation Fund monies is not practicable.
16-4	See response to comment 3-1.
16-5	We have changed the Proposed Plan to address this issue. Our Proposed Plan is to dispose of parcels larger than 1 acre to another public land managing agency or agencies, or to other public or government entities only. We will not be transferring any parcels larger than 1 acre to private conservation groups. Parcels less than 1 acre may be transferred to any interested agency or group or sold to private landowners.

COMMENT NUMBER	RESPONSE
16-6	The Proposed Plan closes all BLM federal mineral estate to mineral leasing and mining of locatable minerals. In addition, federal mineral estate would be closed to sand and gravel mining, with the exception of the active, unvegetated portion of the Snake River channel. The projected demand for sand and gravel in the planning area is huge. In keeping with BLM's multiple use mission for public lands management, some gravel mining will be allowed in areas where the impact will be minimal. Sediment loading of the active channel is an ongoing process and gravel extraction is necessary in some areas to remove the buildup of sediment being transported by the Snake River from the landslide upstream on the Gros Ventre River and other sources. The effects of mining gravel in the Snake River channel would be mitigated through seasonal and other restrictions to protect wildlife habitat.
16-7	The BLM has not documented a chronic situation involving overgrazing on the Snake River BLM parcels. We do not feel that elimination of livestock grazing is necessary in order to bring the allotments into compliance with the Standards. The Walton parcel did not meet Standard # 4 because of the season of grazing use rather than the level of use. This will be remedied by a change of grazing season, making the shrub component less vulnerable to herbivory by cattle. The Porter Estate parcel did not meet Standard # 4 due to an absence of a desired shrub component, but it could not be confirmed whether cattle or elk were the cause of this situation. Monitoring of this parcel is ongoing to determine a cause for its condition and appropriate action to bring it into compliance with the Standard.
16-8	Thank you for your comment.
16-9	You are correct in noting the potential for conflicts where motorized and intensive non-motorized activities occur simultaneously. The specific management prescriptions for OHV use would be determined by the acquiring management entity. Subsequent OHV limitations may be applied based upon the need to protect public health and provide for public safety.
16-10	See response to comment 16-6.
16-11	Where negative impacts to the Snake River ecosystem are identified and are the result of improper grazing management, appropriate actions will be taken which should reduce the impacts, as provided for in the Proposed Plan.
16-12	The Proposed Plan provides that all motorized activities be limited to designated roads. This type designation would help prevent adverse impacts to soil, water and vegetation by reducing the potential for motorists to pioneer trails and roads.
16-13	An effective Integrated Pest Management program uses chemical control as one of the available tools. In some cases this may be the only possible and economically viable option to prevent the spread of some extremely invasive weed species that are present on the Snake River parcels. BLM guidelines are strictly followed to prevent affecting other vegetation and wildlife. If streams and wetlands are involved, only those chemicals and methods that have been tested and are approved to be used in these areas are considered. If other methods of control are better suited for a particular species or area, then these are used in place of chemical control. In cases where other methods cannot control a problem, it is necessary to have chemical control options available. All methods of control and their effects are compared to how the invasive exotic affects the habitat and other plant and animal species and the appropriate method(s) are chosen. Not having all options potentially available may allow additional harm to selected habitats from exotic species.

COMMENT NUMBER	RESPONSE
16-14	The BLM does not intend to invest resources in the development of a Recreation Area Management Plan (RAMP) at this time. While we recognize that recreation management issues and problems on the river grow greater each year, we are unable to invest staff time and operation dollars in developing a RAMP for parcels that we intend to transfer to other management entities. The acquiring entity or management entity would employ whatever strategies are deemed necessary to comply with the BLM general objectives of maintaining access and recreation opportunities that are compatible with the protection of important wildlife habitat and open space.
16-15	We agree that a RAMP or similar recreation management plan for the river is necessary. However, we are unable to invest staff time and operation dollars in developing a RAMP for parcels that we intend to transfer to other management entities. It is our intention, through the Snake River RMP, that a local agency or agencies with more presence in Teton County and direct knowledge of the issues, would acquire management of recreation use of the river parcels. BLM would be willing to participate in developing a recreation management plan or strategy if another agency or public group could be found to take the lead on the effort. See also the response to comment 16-14.
16-16	Removal of the river levees is not within the authority of the BLM. Levee construction, maintenance and management are handled by the COE.
16-17	Due to the location of some of the BLM parcels (Wilson and South Park Bridges) the exclusion of all rights-of-way is neither practicable nor does it follow regulations found in 43 CFR 2800.
17-1	See response to comment 3-1 and 5-1.
18-1	The Preferred Alternative did not identify specific entities to receive the parcels because none had yet been found. The many complications involved in managing the parcels, combined with the Proposed Plan's requirement to retain them in public ownership and manage them for wildlife habitat, public access, recreation, and open space have proved to make acquisition of the parcels unattractive for most public agencies in the Teton County area.
18-2	Thank you for your comment.
18-3	Thank you for your comment.
19-1	See response to comment 3-1 and 18-1.
20-1	Thank you for your comment.
20-2	BLM manages the public lands as directed by FLPMA and other laws.
21-1	See response to comments 3-1 and 5-1.
22-1	See response to comments 3-1 and 16-3.
23-1	See response to comments 4-3 and 5-1.
24-1	It is correct that a healthy grass community can effectively compete with noxious weeds and even reduce their invasion. Another point to consider in an environment already containing significant infestations of noxious weeds is that in the fall noxious weeds have produced their own seed source. (Hounds-tongue is a good example). Cattle are effective transport agents of these noxious weed seeds, especially those that cling to an animal's fur. We have modified the Proposed Plan to allow fall livestock grazing in cases where the allotment meets the Standards for Rangeland Health and the fall grazing follows a plan that will help to achieve vegetation management objectives.
25-1	See response to comments 3-1, 4-2, and 16-3.
26-1	See response to comments 3-1, 5-1, and 9-1.

COMMENT NUMBER	RESPONSE
26-2	See response to comment 16-6.
26-3	Thank you for your comments. To comply with the terms of the Snake River judgements, some roads and levees must be kept open to at least some vehicle use.
26-4	See response to comment 3-1.
26-5	The Preferred Alternative was developed with the assumption that the natural resource values of the Snake River could be maintained with a continuation of livestock grazing with proper management.
26-6	The BLM would not collect public access fees under the Proposed Plan, mainly because we intend minimal management presence in the interim period prior to transfer of the parcels to other agencies. Future parcel owners could revisit the issue of public access fees.
26-7	Under the Proposed Plan, the management of camping opportunities is reserved to the acquiring landowner or management entity.
26-8	Part of the objective of vegetation management is to maintain or improve the diversity of plant communities to support watershed protection and scenic resources. Vegetation management also strives to maintain or improve the area for whatever wildlife species are present and also for any other authorized uses of the area. One of the decisions being analyzed is the authorization of livestock grazing in certain areas. Whatever the final decision, the vegetation management objectives remain the same: plant communities in the planning area will be managed to maintain or improve their overall health and diversity. Regarding weed control, see response to comment 16-13. Also: Mechanical control is also one tool that has a place and is used when other methods are unable, by themselves, to provide the necessary control or eradication of the target weed species. It is used when necessary and in a manner that will protect the habitat as much as possible.
26-9	See response to comment 3-1.
27-1	BLM recognizes that there are competing management objectives, and that not all uses can be maximized. While the mission of BLM is multiple use, we recognize that not all uses can occur on all parcels. The Proposed Plan attempts to present a balanced array of uses while preserving resources such as wildlife habitat.
27-2	Specific future management requirements, such as allowing staging areas for gravel production, camping, livestock grazing, and other uses, will not be included in the terms of parcel transfer. The future parcel owners will make these decisions.
27-3	If the Recreation and Public Purposes Act is used to transfer lands to Teton County, an approved plan for management and development, with appropriate time frames, would be developed before the lease and/or patent were issued.
28-1	The BLM disagrees. Omitted lands by definition are lands that were in place at the time of survey but are not shown on the original plat and which are so situated as to have been excluded from the survey by some discrepancy in the location of a meander line. The BLM parcels in question are omitted lands.

COMMENT NUMBER	RESPONSE
28-2	Only very small portions of the private lands along the section of the Snake River in question do not have recreational easements. While we are not able to map the easements for the Final EIS, information on their location and allowed uses is available in the Pinedale BLM Field Office. Various attorneys in the Jackson area completed most of the recreational easements, and the wording used varies slightly. For example, the earlier recreational easements were broader in scope than the later easements that were approved. For the most part the public cannot use the uplands on private lands encumbered by the recreational easements; the easements generally only apply to lands in the Snake River channel that lie between the levees. The broader easements allow the public access to the levees, but never to lands upland of the levees. The later more restrictive easements preclude public access to the levees. Some clarifications have been made in the text in the Final EIS.
28-3	The judgment that controlled this parcel is WYW-111715, and the title was quieted to the United States on March 28, 1988.
29-1	Resource conditions that are non-conforming to the Rangeland Health Standards on a significant portion of a grazing allotment constitute a determination that the entire allotment is not meeting the Standard.
29-2	There is a typographical error on page 210 of the Draft EIS; the text should have read "…Standard 4…" Parcel 9 did meet Standard 3. We have corrected this error in the Final EIS.
29-3	We did determine, during evaluation of parcel 9 for compliance with the Standards for Healthy Rangelands, that livestock grazing was a cause for the parcel failing to meet Standard 4. The condition of the understory shrub community on parcel 9 also compares unfavorably to shrub conditions on adjacent parcels that are not leased for livestock grazing. See also response to comment 24-1, second part.
29-4	The BLM interprets the final judgment of the US District Court differently. We feel we have conformed with the judgment and stipulation. We included pertinent language from the Stipulation for Entry of Judgment regarding the Walton Ranch Company's right to lease parcel 9 for livestock grazing in the Draft EIS on page 55. In compliance with the judgment, BLM has issued grazing authorization to the Walton Ranch Company for parcel 9, the Walton allotment, every year since 1996. The Snake River RMP constitutes a legally mandated planning process, as referred to in the stipulation for judgment, that could make the determination that parcel 9 should no longer be used for agricultural purposes. We have not made that determination. However, as a result of the failure of the allotment to meet Standard #4 of the Wyoming Standards for Rangeland Health, we have determined that changes in grazing management are necessary in order to comply with another portion of the Stipulation, which states that the United States agrees that the use of parcel 9 will be consistent with the maintenance of the parcel in an optimum condition for the protection and preservation of aquatic and wildlife habitat.
30-1	Thank you for your comment; see also response to comment 3-1.
30-2	The BLM intends to close all federal mineral estate in the planning area to mineral leasing or development, with the exception of the Snake River channel, which will remain available for gravel mining.
31-1	See response to comment 3-1.
31-2	Mining of gravel within the active channel of the Snake River is the Proposed Plan; see also response to comment 16-6.
31-3	See response to comment 3-1 and 5-1.
32-1	See response to comment 3-1.

COMMENT NUMBER	RESPONSE
32-2	Under the Proposed Plan, this parcel (parcel 27) would transfer to Teton County.
33-1	The correction has been made in the Final EIS.
34-1	The correction has been made in the Final EIS.
35-1	Thank you for your comment.
36-1	See response to comments 3-1 and 5-1.
36-2	BLM agrees that the lands should be maintained for public access. It is our opinion that recreation uses on the river can be managed more efficiently by a local, Teton County entity without the involvement of BLM. While we agree that a partnership for management of the boat ramp sites and recreation use is a good idea, BLM cannot mandate this partnership. We do plan to investigate options for cooperative management of recreation uses on the parcels. The BLM does not have a budget to manage recreation use for lands in Teton County. The Proposed Plan would provide assurance that river access sites would be maintained for public access regardless of land ownership.
37-1	Only a portion of parcel 3 was located inside Grand Teton National Park. The portion of parcel 3 located outside the Park boundary remains a BLM parcel, and the acreage was correct in the Draft EIS, including only that area (approximately 12 acres).
37-2	See response to comment 28-2.
37-3	Thank you for your comment. Alternative A is the No Action alternative, and describes actions and impacts that could be expected to occur if the current BLM management direction were continued. Our current management direction does not include sale or transfer of the parcels.
37-4	BLM maintains its opinion that retention of mineral estate in BLM hands, with the surface lands owned by other entities and possibly carrying conservation easements held by still other entities, would complicate land ownership and management.
37-5	If all alternatives presented the same opportunity for parcel transfer or sale, then no range of alternatives or impacts would be presented in the EIS. Disposal or retention of the parcels carries impacts in itself, and the EIS attempts to show these impacts by allowing differing levels of land transfer in the different alternatives.
38-1	Thank you for your comment.
39-1	Our goal in the Proposed Plan is to allow management flexibility to the acquiring agency, while assuring that future management would generally provide for wildlife habitat, public access, recreation, and open space. Our intent is not to limit the options of the acquiring management agency within these broad guidelines. Allowing parcel transfers only to other government or public entities would preserve the public's right to have input on parcel management decisions.
39-2	See response to comment 5-1.
39-3	Thank you for your comment.
39-4	Thank you for your comment. This change has been included in the Final EIS.
39-5	See response to comment 16-3.
39-6	This suggestion is not necessary. It effectively excludes the entire area from ROWs. Some rights of way can be implemented without adverse impacts to other resources. See also response to comment 16-17.
39-7	Thank you for your comment; see also the response to comment 26-8.
39-8	Thank you for your comment.
39-9	Thank you for your comment; we have included some of your recommendations in the Final EIS.

COMMENT NUMBER	RESPONSE
39-10	Thank you for your comment.
39-11	Thank you for your comment.
39-12	See response to comment 16-6.
39-13	The access referred to in this section applies strictly to access across public lands for the purpose of mining sand and gravel. References to recreational access are inappropriate in this section.
39-14	Thank you for your comment.
39-15	See response to comment 39-1.
39-16 39-17 39-18	The BLM agrees with your assertion that a RAMP would provide the proper foundation to manage recreation use and protect other values; however the Proposed Plan would authorize the acquiring entity to employee whatever strategies deemed necessary to comply with the general objectives to maintain public access and recreation in a manner compatible with important wildlife values. Currently the BLM does not have the resources to manage the lands for optimum public benefit. See also responses to comments 16-14 and 16-15.
39-19	Within the context of allowing management flexibility, the BLM would not constrain the acquiring agency's option to consider a public process to authorize the development of a boat access near the South Park Bridge. A decision within this RMP addresses only the potential for development of a boat access at the South Park Bridge; it does not authorize boat ramp construction.
39-20	See comment 39-16.
39-21	Thank you for your comment.
39-22	See first part of 26-8.
39-23	Thank you for your comment.
39-24	Thank you for your comment.
39-25	Thank you for your comment.
39-26	Thank you for your comment.
39-27	Thank you for your comment.
39-28	The protection of wildlife corridors is a subset of managing wildlife habitat. The corridors are generally season-of-use specific, which does allow for alternate uses during other seasons. Because the habitats along the Snake River are unique and essential to a high diversity of wildlife, the BLM agrees that "sound conservation biology" should be applied to the management actions governing all the resources.
39-29	Mitigation measures on any project to prevent potential or predicted adverse effects, or to restore resources after the effects have occurred, is a common approach in resource management. We agree that the wording needs clarification so as to demonstrate that there are several possibilities for mitigation, including not allowing a project if the potential adverse impacts to aquatic resources are unacceptable. However, there could be projects that will fall outside of BLM jurisdiction, or that will provide a greater public need (such as health and safety) where it will not be possible to mitigate all adverse impacts. We have made some clarifications in the Final EIS to address your comment.
39-30	The BLM agrees that a minimum amount of fencing is most beneficial to wildlife and that proper analysis is necessary for both the retention and the construction of new fences. Where new fences have been determined to be necessary, the BLM is obligated to ensure that these conform to BLM wildlife-friendly standards in Fencing Manual Handbook H-1741-1. Existing fences can be maintained without analysis, but must conform to BLM fencing standards.

COMMENT NUMBER	RESPONSE
39-31	The BLM has not proposed a land sale to the Jackson Hole Land Trust (JHLT). This is JHLT's proposal, and has not yet been officially submitted to BLM. The BLM Proposed Plan provides for the transfer of the parcels to another public land managing agency, or other public or government entities. The land managing agencies would be obligated under the terms of the transaction to apply management prescriptions to retain the lands, and maintain them for public access, recreation use, open space and wildlife habitat.
39-32	See responses to comments 16-14 and 16-15.
40-1	See response to comment 3-1.
40-2	See response to comment 16-6.
40-3	Thank you for your comment. Grand Teton National Park has advised us that their interest in the BLM Snake River parcels is only as trading stock to acquire inholdings within the Park; under this scenario the BLM parcels would end up in private ownership. The Bridger-Teton National Forest has, in the past, expressed the same interest in using the BLM parcels as trade stock for acquiring private inholdings within the Forest boundary. See also response to comment 18-1.
41-1	It is correct that public input in management of the parcels would be lost if the parcels were to become privately owned. We have considered this impact and its meaning to the public in Teton County in determining our Proposed Plan. Options allowing private sale have been deleted from the Proposed Plan, except for parcels less than 1 acre in size. Also see response to comment 3-1.
41-2	See response to comment 5-1.
41-3	Thank you for your comment.
41-4	Thank you for your comment. All these options are viable under the Proposed Plan.
42-1	See response to comments 3-1 and 5-1.
43-1	Less commercial use may well reduce impacts to wildlife; however few benefits will be realized without a balanced approach to the management of all recreation use. The proposal by Teton County to develop a boat access at the South Park Bridge on public lands is for the purpose of reducing the potential for serious injury or death. The BLM believes the greater public benefit would be to allow this development if in fact it adequately addresses the issue of safe access. If the decision were made to allow the use of parcel 26 for a public boat access, mitigation practices would be implemented to reduce impacts to wildlife, visual resources and the quality of life. Regarding the issue of high water eliminating boat access, the BLM recognizes that at times the Snake River's high flow and volume make most boating access impractical. See also response to comment 39-19.
43-2	The Proposed Plan attempts to address the public preferences expressed in the Contingent Valuation Methodology (CVM) survey, while allowing for uses necessary to protect public safety and allow recreation access to the public.
44-1	See response to comment 5-3.
44-2	See response to comment 3-1.
45-1	See response to comment 5-1 and 41-1.
46-1	See response to comment 5-1.
46-2	The Proposed Plan defers decisions specific to recreation activities other than for day use to the acquiring management entity. See also response to comment 5-2.
46-3	See response to comment 3-1 and 41-1.

COMMENT NUMBER	RESPONSE
46-4	For any land transfers that BLM carries out, a public process would be included and would allow for public input on the specific transfer being considered. Options allowing private sale of the parcels have been deleted from the Proposed Plan, except for parcels less than 1 acre in size.
47-1	See response to comment 3-1 and 5-1.
47-2	The Proposed Plan defers decisions relative to signing and other recreation management actions to the acquiring entity.
47-3	See response to comment 5-1, 39-31 and 41-1.
48-1	See response to comments 3-1 and 5-1.
49-1	See response to comment 3-1 and 5-1.
49-2	See response to comment 5-3.
50-1	See response to comment 5-1. It is true that changes in ownership of the parcels, even to other public agencies, may affect their availability for hunting. We have added this to the impact analysis in chapter 4 of the Final EIS.
51-1	See response to comment 3-1,5-1, and 41-1.
52-1	We have determined that sale of the parcels at less than fair market value to private conservation groups is not in the public interest. See also response to comment 41-1.
52-2	See response to comment 5-1.
53-1	Thank you for the information concerning your Aquatic Integrity analysis. We agree that this area is a key fishery and water quality area. We will consider your information in the development of the RMP. The BLM recognizes the unique values associated with the entire Snake River corridor through the Jackson Hole valley. This area has been instrumental in the recovery of the bald eagle population as well as providing important migration and nesting habitats for other wildlife species. A major focus of the Proposed Plan is to retain habitat diversity for a viable wildlife population. The Proposed Plan does eliminate oil and gas leasing and development and mining from BLM lands and mineral estate. BLM's mandate for multiple resource management allows for proposals to develop salable minerals. Each proposal would be analyzed on a case-by-case basis so as to prevent adverse impacts to wildlife populations.
54-1	It is true that many specific options for transfer or management of the BLM parcels are available. It is not the purpose of the Snake River RMP EIS to analyze every specific land transfer that would be possible. It is the intent of the RMP to determine whether land transfers will be considered, and under what conditions. Specific proposals to transfer land would then be analyzed at a later date, and would have to meet the conditions laid out in the RMP. The Proposed Plan requires that lands can only be transferred to public land managing agencies or other public or government entities; that the lands must be maintained in that or other public ownership, not sold to private owners; and that the parcels must be managed for wildlife habitat, recreation, public access, and open space.
55-1	Thank you for your comment.
55-2	Thank you for your comment. We acknowledge the popularity of this area for recreational use.
55-3	Thank you for your comment. We have incorporated the information you referenced.
56-1	See response to comment 3-1.

COMMENT NUMBER	RESPONSE
56-2	This is true. The habitats along the Snake River are very important to wildlife and fisheries. The functionality of the floodplain, however, is no longer pristine and it is doubtful that it can be returned to a 'pre-leveed' state. The BLM lands that are currently 'un-leveed' will remain so as long as there is no over-riding public need (such as health and safety) or other issues that may arise. The functionality of the lotic riparian system through this area is considered by BLM to be 'non-functional'; meaning that the system is clearly missing some parameters that make it susceptible to degradation. The riparian areas behind the levees and in other portions of the river have a new potential and are really just sub-irrigated riparian/wetland areas. These areas will be managed for that potential in at least a proper functioning condition.
56-3	See response to comment 3-1.
56-4	Thank you for you interest in helping to implement the Proposed Plan. The proposal you present complies with the Proposed Plan. We are interested in talking further with the Snake River Fund about how to implement your suggested interim management of the parcels and their ultimate transfer to local agencies.
56-5	See response to comment 16-15.
57-1	See response to comment 3-1 and 5-1.
58-1	The Biological Assessment for the Snake River RMP will contain specific conservation measures for those species covered by the Endangered Species Act and identified to be present or to have potential habitat on BLM lands. The "reasonable and prudent measures" and "terms and conditions" which will be forthcoming in the Biological Opinion from the U.S. Fish and Wildlife Service will be incorporated into the RMP for wildlife protection.
58-2	The need for conservation easements would be determined on a case-by-case basis, depending on the type of land transfer being considered and the proposed recipient. Clarifying statements about conservation easements are not appropriate here in the discussion of cumulative impacts. This option is included so that we can implement a conservation easement if it becomes necessary.
58-3	The BLM concurs that Section 7 consultation under the Endangered Species Act should occur prior to land disposal. This clarification has been added to the Final EIS.
59-1	The Proposed Plan attempts to retain the public land parcels in some form of public ownership, with management for public access, recreation, open space, and wildlife habitat, by an agency with a presence in Jackson Hole that could manage the lands more efficiently than the BLM.
59-2	See response to comments 46-4 and 54-2.
59-3	The greatest impact on the condition of the river is the flood control levees, which are not constructed or managed by the BLM. It is true that recreation use issues have emerged over the last 5 years or so and need to be addressed, but these issues have not yet progressed to the level where they impact overall river health.
59-4	It is our opinion that recreation uses on the river can be managed more efficiently by a local, Teton County entity without the involvement of BLM. See also responses to comments 16-15 and 36-2.
59-5	The BLM acknowledges the need to address the recreation use issues you presented. For this reason the BLM proposes to relinquish its management responsibilities to the entities most capable of properly managing this valuable public resource. See also response to comment 36-2.
59-6	See response to comments 3-1 and 5-1.
59-7	See response to comment 54-1.

COMMENT NUMBER	RESPONSE
59-8	See response to comments 3-1, 5-1, 54-1 and 59-1.
59-9	Officials from the Bridger-Teton National Forest have told us on more than one occasion, notwithstanding their comment letter on the Snake River RMP DEIS, that they are unable to acquire any more river recreation management responsibilities in Teton County. We have not approached the BLM office in Idaho Falls because managing the Snake River in Jackson Hole from Idaho Falls seems more impractical to us than managing it from Pinedale. The Proposed Plan lays out requirements for the future management of the parcels, including retention in public ownership and management for wildlife habitat, public access, recreation, and open space, that most public agencies are not interested in or are incapable of carrying out for these parcels.
59-10	The BLM agrees that a formal coordinated planning process is necessary to address recreation management and other issues. A well-developed plan would provide the basis for maintaining quality recreation experiences while protecting the other important resource values enjoyed by the public on the Snake and Gros Ventre Rivers. The general management objectives for the RMP are to maintain public access and protect important wildlife values. The BLM would seek to maintain these values regardless of future land ownership. See also responses to comment 16-14, 16-15, and 36-2.
59-11	See response to comment 5-2, 16-14, 16-15, 39-1, and 59-10,.
59-12	See response to comment 39-31, 46-4 and 54-1.
59-13	Unlike the Bridger-Teton National Forest or the Grand Teton National Park, the Bureau of Land Management (BLM) does not have a physical presence in Jackson Hole. BLM understands that the public is concerned about preserving public use of public lands and river access along the Snake River. The Proposed Plan attempts to achieve improved management of the parcels and enhanced management presence on the parcels while retaining public access, recreational opportunities, wildlife habitat, and open space. There are a variety of ways to accomplish this goal, which can be explored following completion of the RMP. Specifics of who manages the parcels do not need to be spelled out in this document, as long as the goal is safeguarded.
59-14	We are unable to extend the comment period on the DEIS, and do not find it necessary. Comments were solicited on the DEIS, not on any proposal that might be submitted by any group. A formal proposal from the JHLT has not yet been received. The purpose of the RMP EIS is not to analyze any specific proposal, but to establish the broad terms under which land transfers might take place.
60-1	Thank you for your comment. The Proposed Plan does not include this option, as it was determined not to be in the public interest. See also response to comments 41-1 and 52-1.
61-1	See response to comment 3-1.
61-2	The provision of recreation facilities, management of recreation opportunities and use, including camping, will become the new managing entities' responsibility.
61-3	Thank you for your comment.
62-1	See response to comment 59-1. Riparian Proper Functioning Condition (PFC) is not going to be reached on the Snake River while the levee system exists; and removing the levees is impractical, a safety hazard, and not within the power of BLM. A group such as this could be formed under the terms of the Proposed Plan in the interim prior to parcel transfer, to determine river management needs and the most appropriate parcel transfer methods and recipients.

COMMENT NUMBER	RESPONSE
62-2	Landownership of the parcels is a central issue to the RMP because determining the long-term ownership of the parcels plays into the determination of how much management time and money should be invested in the parcels by BLM. We recognize the limitation on evaluating the impacts on the parcels due to future changes in ownership. This in itself is part of the impact analysis; the unknown character of future management and its impacts if BLM does not retain the parcels is an impact of choosing the Proposed Plan.
62-3	See response to comment 39-1 and 62-2.
62-4	It is true that management of scattered parcels has difficulties no matter who is managing them. BLM's opinion is that management of these parcels would be more efficient if carried out by an agency with a management presence in Jackson Hole.
62-5	See response to comment 54-1.
62-6	See response to comment 59-4 and 59-13.
62-7	While it is true that the Snake River is in less than Proper Functioning Condition (PFC) because it cannot access its floodplain to dissipate stream energy and maintain streamside plant communities, BLM disagrees that this should be a central issue to the RMP. This EIS and RMP address issues identified through our public participation and scoping process, including cooperative management of lands under differing ownerships, recreation management, development of construction materials, and land ownership.
62-8	Environmental protection underlies all of the alternatives except, perhaps, Alternative D. Each alternative seeks to resolve the planning issues while minimizing impacts; where impacts would occur, they are revealed in Chapter 4. See also response to comment 62-7.
62-9	Landownership adjustment is a planning issue because BLM has received many proposals from private landowners to acquire parcels. Because of the value of land in Jackson Hole, the desire of landowners to acquire the parcels, and their value as a recreational resource to the public in Teton County, a decision specifically regarding whether the parcels can be transferred or sold, and under what conditions, is very necessary and a central issue to the plan.

COMMENT NUMBER	RESPONSE
62-10	It is important to understand the relatively small size and positions of the BLM parcels in relation to the Snake River system. Extensive levee systems bound both banks of the river along the reach where the parcels are located. This results in a highly confined river system and the creation of two different types of BLM parcels, those within the levee system and those outside. Within the Levees Given the small size of the BLM parcels in relation to the Snake River system and the continued presence of the levee system on both sides of the river, management of the BLM parcels within the levee system would have little if any affect on the large scale hydrologic functioning of the river within the levees. The presence of the levees has resulted in a general erosion of the channel between the levees with areas of localized deposition at points of constriction, such as Wilson Bridge. The existing system of levees will most likely remain or even expand during the life of this plan. The BLM parcels must be managed with this condition in mind. In fact, the presence of the levee system has most likely resulted in the loss of the land surface of parcel 5 and the active erosion of several other parcels. Given the results of past flow events on parcels that are as vegetatively stable and close to natural conditions as possible, maintaining or improving vegetative conditions on the parcels within the levees can slow but not prevent the erosive process. The COE is pursuing several actions to stabilize the channel between the levees that the BLM has cooperated with. Under all alternatives, BLM would continue to cooperate with the COE channel stabilization efforts and maintain and improve vegetation. Stipulations that would continue these policies would be applied as conditions of transfer if management responsibilities were transferred to other entities. So, everything that can be done on the BLM parcels to improve hydrologic functions within the levees has been done and will continue to be done, even if the surface management of the parcels changes as a result of this plan. Outside the Levees The existence of the levees has changed the potential of several of the wetlands associated with the Snake River from a lotic riverine floodplain to a lentic sub-irrigated meadow and forest. Because the levees will most likely exist throughout the life of this plan this results in the need to manage such areas for their new levee induced potentials. Because of their locations on the lower energy side of the levees, such systems have shown and will most likely continue to show a greater degree of vegetative cover and surface stability than the parcels located within the levee system. Under all alternatives, the BLM parcels would be managed to maintain or improve existing vegetative cover. The parcels have been and will be maintained to provide the greatest benefit to the public but will most likely have only limited local effects. Given the relative size of the BLM parcels to the Snake River system, the BLM parcels have much less effect on the landscape scale hydrology than the dams and levees. What can be done to maintain and improve the hydrologic functions of the Snake River from the BLM parcels has been done and will continue to be done under all alternatives, but the overall hydrologic condition of the area will be determined by actions taken by other agencies and individuals.

COMMENT NUMBER	RESPONSE
62-11	BLM's power to affect riverine function or other environmental conditions in the Jackson Hole valley is extremely limited by the small size and detached nature of our parcels. BLM feels that the criteria for selecting the Preferred Alternative are appropriate as listed in the DEIS. See also response to comment 62-10.
62-12	See response to comment 62-1, 62-10, and 62-11; BLM feels that the approach used in formulating the alternatives for the DEIS was appropriate. It should be recognized that, due to the levee system, the lotic riparian system is now clearly lacking some functional properties, particularly in relation to floodplain access. The levee system is not under the jurisdiction of BLM management. Between the levees BLM does not believe that the river can be restored to a state of PFC. The levees create a different kind of potential for the riparian system behind them. We now consider these areas more of a lentic wetland or sub-irrigated riparian area, with the exception of the small streams/canals that cross a couple of parcels. BLM intends to manage them as such in at least proper functioning condition for their new potential. There is no proposal to return the river to an un-leveed system with an active floodplain and that is beyond the scope of this document. However, the plan does put in place the guidelines for management of the parcels that will allow for site-specific actions for restoration, recovery, enhancement or preservation of aquatic, riparian and wetland habitats to occur.
62-13	There are no specific projects developed concerning aquatic resources in the RMP. This level of planning and analysis would be more appropriate in the Activity or Project level of planning and implementation. The RMP level of planning is by and large broad by nature. It sets in place the guidelines that will allow for site-specific actions for restoration, recovery, enhancement or preservation of aquatic, riparian and wetland habitats to occur. Some of these parcels are already identified as important in restoring or enhancing fish habitat and are part of a multi-agency/group project in site specific planning. Most of the parcels have similar potentials but there is not a current proposal for parcel-by-parcel projects. More in-depth inventory and analysis would be needed at that time.
62-14	These statements are not inconsistent. While we feel that conservation easements would not be necessary under the Proposed Plan, the plan leaves open the option of using them if they were to become necessary to implement some land transfer option that might be proposed.
62-15	Thank you for your comment. The option of creating a Special Project Area for use of LWCF funds is included in some alternatives and not in others in order to provide a range of alternatives for analysis.
62-16	Management objectives are to maintain or improve ecological conditions and the diversity of plant communities for the benefit of wildlife habitat, watershed protection, and riparian areas. The remaining cottonwood stands that have the proper natural conditions remaining for reproduction after the levee construction are important elements of the Snake River Corridor and are considered in all management decisions. Our livestock grazing management decision allowing for adjustment in the level of livestock grazing and the terms of grazing leases (provided for in the grazing regulations) provides for this type of management for cottonwood regeneration.
62-17	See response to comment 39-1 and 62-2.

COMMENT NUMBER	RESPONSE
62-18	The improvement of floodplain function may be moot with the levee system in place. 'Irrigating' the riparian area behind the levees is one possible project to maintain the riparian plants and wetlands. There may be many such projects that could be devised, but these types of things would be more appropriately addressed at a more specific and detailed project planning stage. The RMP land use level of planning should just set the stage for such future actions.
62-19	See response to comment 62-2.
62-20	We use all available information in analyzing and determining how various management decisions affect vegetative condition. These data are extensive and available for review in our files.
62-21	Though the exact type of wetland or riparian function is not calculated by acreage for each parcel, they are generally the same (i.e. cottonwood/willow/sedge-rush/and other riparian shrubs). Restoring floodplain characteristics may be a moot point considering the existing levee system and is not a goal of this plan. What is a goal is to maintain or enhance the riparian/wetland system behind the levees considering their new potential as a sub-irrigated riparian/wetland site. Also, there are some streams/canals that provide some habitat that will also be maintained or enhanced. The land use plan sets in place the guidelines that will allow that to occur. Specific projects for enhancement would be more appropriately addressed at the Activity or Project level planning stage.
62-22	Table 4-2 is intended to list the impacts to each land use or resource category. Thank you for your comment.
62-23	See response to comment 62-2.
62-24	10% was an underestimate of the proportion of the length of the Snake River occupied by BLM public land surface. Public lands actually occur along 29% of the Snake River between Grand Teton National Park and the South Park bridge. However, the parcels occur randomly spaced along a very narrow corridor, and this number overestimates the total amount of the river's riparian area or former floodplain that is managed by BLM.
62-25	While BLM feels that the majority of the parcels are inappropriate as building sites, we have added some language on the potential development of the parcels under Alternative D to the narrative.
62-26	We have tried to clarify the cumulative impact analysis section. However, since an RMP is a broad-based document and most specific impacts are determined at the activity planning level, impacts in this section tend to be somewhat general in nature.
63-1	Thank you for your comment.
63-2	See response to comment 62-2. While BLM intends the parcels to be managed for wildlife habitat and for future owners to cooperate with the Wyoming Game and Fish Department, you are correct in noting that it is impossible to predict how the effects of ownership transfer will actually play out. However, before transfer of any particular parcel could occur, a public process would take place.
63-3	This is an interesting proposal. However, creating a rating system for each parcel would be more appropriate at the activity planning level. It would be a good idea to inventory each parcel prior to transfer for habitat quality, diversity, potential and need. As far as fisheries are concerned, some of these parcels are already identified as important in restoring or enhancing fish habitat and are part of a multi-agency/group project. Future restoration, enhancement, or even preservation work for fisheries would benefit from a future classification by parcel. See also response to comments 27-2 and 39-1.

COMMENT NUMBER	RESPONSE
63-4	The information in Table 4-2 presents the impacts to wildlife habitat from each individual management action. Cumulative impacts are presented at the end of Chapter 4. Complicating the impact analysis for the Proposed Plan, it is impossible to determine exactly the impacts on wildlife habitat that would occur due to actions taken by future parcel owners. For fisheries it is not necessary to distinguish between parcels. Though there are some minor variations between parcels, splitting them out individually would not be useful at this level of plan.
63-5	While the WGFD may designate the entire stretch of the Snake River from Moose south as trumpeter swan wintering habitat, the data provided by the WGFD and those referenced from the USFWS, COE, and the NPS do not support the assertion that this entire reach of the Snake River is either used by or essential to the sustainability of the trumpeter swan population. Protection of wildlife habitats is a major objective of the Proposed Plan. Those areas where trumpeter swans have an identified presence would be protected by the appropriate land use restriction or management prescription.
63-6	The final protective measures for bald eagles will be determined as defined by the Statewide Programmatic Bald Eagle Biological Assessment (BA), which is currently being finalized jointly with the U.S. Fish and Wildlife Service. The use of seasonal restrictions for various activities in bald eagle habitats will be identified in the BA. Under the Endangered Species Act (ESA), the U.S. Fish and Wildlife Service is the regulating authority for all species covered by the protection of ESA. While bald eagle nesting may in fact be present on or near BLM parcels, it is a concern of WGFD and BLM that the specific locations of these nesting areas not be identified in public documents so as to provide a level of anonymity for their protection from inappropriate human disturbance.
63-7	Thank you for your comment.
63-8	This is a good idea and will be included in the document. As always, the actual dates to be used for spawning and egg incubation, will be determined through coordination with WGFD as needed for the species in question.
63-9	This change has been made in the Final EIS.
63-10	Thank you for the information on the ownership of Boyles Hill and Abercrombie warm springs. The Final EIS has been updated with this information.
63-11	“Bonneville” has been dropped from the text to reflect current taxonomic nomenclature.
63-12	Thank you for your comment.
63-13	Thank you for your comment.
63-14	Preservation of livestock grazing did not emerge as a central issue during the public participation in the planning process. BLM will not require of future parcel owners that they allow livestock grazing on the parcels. This decision would be up to the future owners. See also response to comment 39-1.
63-15	Thank you for your comment.
64-1	See response to comment 3-1.
64-2	See response to comment 4-2.
65-1	See response to comment 3-1.
65-2	See response to comment 4-3.
65-3	See response to comment 16-3.
66-1	See response to comment 3-1.
66-2	See response to comment 4-3; also, the interdisciplinary planning team did not identify any parcels in the planning area to be eligible or suitable for wilderness designation.

COMMENT NUMBER	RESPONSE
67-1	See comment 3-1 and 56-4.
67-2	The BLM would be interested in further discussing the concept of the Forest Service managing some or all of the parcels, with or without a change in actual parcel ownership.
68-1	The road you see on the website map is part of the information on the USGS topographic map, which was used as a base map for Draft EIS mapping. It may have been a road at one time. We do not have the authority to remove this information from the USGS maps.