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

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 85% 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

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

3

RECEIVED
MAY 19 2003
PINEDALE RESOURCE
AREA OFFICE

"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 inequities that Teton County could charge the public. Some rivers in California and on the east coast have counties that change over $6/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.

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 to 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 spare condominiums as 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 no

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 its becomes completely unmanageable on the river, and current negative impacts continue to the point of serious damage that nobody can any longer ignore. Each year 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 further away. The proposed "cut and run" 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 meal 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

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 noises 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 office 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 these 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 rash decisions about absolving yourself of being land managers in Teton County, WY. Please extend your comment period to allow 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.

14

Sincerely,

Kip Worthington

Kip Worthington

JACKSON HOLE
LAND TRUST

555 EAST BROADWAY
POST OFFICE BOX 2897
JACKSON, WY 83001
TEL 307-733-4707
FAX 307-733-4144

web site
www.jhlandtrust.org

e-mail
info@jhlandtrust.org

BOARD OF DIRECTORS
Tony Brooks
Bill Campbell
Michael Cardoso
Derek Craighead
Peggy Duncker
Mark Feldman
Ann Frame
Ron Harrison
Paul Lowham
Jack Nunn
Julie Ohrring
Gil Ordway
Scott Pierson
Reynolds Pomeroy
Mimi Slaughter
Clarence Stearns
Pam Swift
Stan Trachtenberg
Richard VanGytenbeek
Terry Whitaker

ADVISORY COUNCIL
Peter Barker
Susanna Colloredo
Harrison Ford
Mike Haffin
Ann Harvey
Jean Hocker
Brand Hort
Bedell Ladd
Dave Larson
Bill Malokey
George McClelland
Charlotte Oliver
Stan Resor
Brian Taylor

EMERITUS DIRECTORS
Vince Lee
Gil Ordway
Tom Rossetter
Allan Tessler
Mike Wardell

CAMPAIGN FOR OUR VALLEY CO-CHAIRS
Allan Tessler
Mike Wardell

EXECUTIVE DIRECTOR
Leslie Mattson

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 provision 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.

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 reserved conservation easements insuring public access and the preservation of natural resources. The JHLT recognizes that not all of the BLM parcels should be managed in this fashion; however, allowing some private ownership as described offers important opportunities for public benefits with minimal

RECEIVED
MAY 19 2003
PINEDALE RESOURCE AREA OFFICE

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

jimmystanford@earthlink.net
05/20/03 06:05 PM

To: pinedale_wymail@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 snakes 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 at Wilson and South Park, and perhaps an overnight camping site or two are needed. The

3 proposal to relocate the South 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.

Printed on Recycled Paper

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) ensures 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

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

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 on-ground presence 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/arkansas/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 in 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 restoring 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 resource use. Because of this, maintenance and improvement of the environmental conditions should be considered as a separate planning issue.

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

9 3. **Planning Issues, Landownership Adjustment, Page 5:** 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 a '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 could increase the future demand for construction of additional levees or movement of existing levees inward, 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, characteristic plant communities, aquatic invertebrate food webs, and vertebrate habitats; and flood plain interspersion 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/trel02-21.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

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) should include system effects that impact the dynamic sustainability of the habitat 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.

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 help add or improve habitat areas. 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 provides uncertainty for determining environmental impacts. Attempts should be made to determine future wildlife habitat decisions to better understand the environmental consequences.

20 13. **Page 71, 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 effect 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 unconnected backwaters, side channels, and oxbows. Once this information is included, the alternatives could be developed to improve the condition and maximize system functions that maintain or create (within the constraints of the levee system impacts) these resources.

22 15. **Table 4-2, Page 99:** 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.

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 Map #1, 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 should be evaluated differently. 2) This paragraph seems to

25 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.

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.

DAVE FREUDENTHAL
GOVERNOR

THE STATE OF WYOMING

STATE CAPITOL
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

Tracy J. Williams
Policy Analyst

TJW
Enclosures: (3)

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

TTY: 777-7860 PHONE: (307) 777-7434 FAX: (307) 632-3909

WYOMING
GAME AND FISH DEPARTMENT

"Conserving Wildlife - Serving People"

May 5, 2003

WER 9611
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 crucial 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, hunting, 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

for ... wildlife habitat" (page 2). On page 134 under Cumulative Impacts of 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 tiered 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 those 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 138-153. 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

Resource Management Plan. Within Zone 1 (400 meter radius of an occupied nest), 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 comment 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:as

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

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

(307) 777-7697
FAX (307) 777-6421

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 # 0100RLC005)

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. 13, 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 0100RLC005 in future communications dealing with this project. If you have questions, please do not hesitate to contact Robert York of our staff at 307-742-3054, or me at 307-777-6311.

Sincerely,

Judy K. Wolf
Review and Compliance Program Manager

Wyoming
Department of Agriculture

Dave Freudenthal, Governor
John Etchepare, Director

2219 Carey Ave., Cheyenne, WY 82002 ■ Phone: 307-777-7321 ■ Fax: 307-777-6593
[illegible]@state.wy.us ■ Website: wyagric.state.wy.us

May 12, 2005

District 1
Lee Otto
[illegible]
District 3
Reed Gardner
District 4
Helen Jones
District 5
Spencer Ellis
District 6
[illegible]
District 7
Arlene Brown

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

Dear Lynn Simons:

Following are our comments on the Draft Environmental Impact Statement on the Snake River 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 stewards 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 option of actual land surface being retained by the BLM if partners 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 retain 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 used throughout this 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 25 notes "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 37 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."

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 those 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 exclosures 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, rest, technology, and living organisms are used. Livestock can be moved on a periodic basis to those lands needing attention. Their early seasonal use can be beneficial to increase palatability, restrict 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 composition and encourage desirable plant growth. They can aid fire management with the removal of fine fuels. They can be intensely 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 publics." 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.

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 in the preferred alternative on page 23 where they state, "Adjustments in 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 irreplaceable 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 restrict 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 Walton Ranch would continue to be upheld.

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

Sand and gravel mining wouldn't be affected, as those operations would be occurring after the grazing season had ended and the mining would be occurring between the levees. Also, because of the existence and extent of the levee system, the DEIS notes on page 138 that action taken on public lands will most likely have only minor impacts on the channel condition and non-point source related quality.

The environmental and social values of livestock grazing are gathering growing significance. Those values of critical winter habitat for wildlife, the scenic vistas and the open spaces are becoming increasingly valuable as developments destroy those 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 allow 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 entities acquiring the BLM parcels or taking over management responsibility would be obligated under the terms of the transaction to maintain them 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 this project.

Sincerely,

John Etchepare
Director

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
MAY 19 2010
BUREAU OF LAND MANAGEMENT
BOISE DISTRICT OFFICE

kaho@montana.edu
(Ken A Aho)

05/13/03 09:38 AM

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

Kellie 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 DEIS for the Snake River Resource Management Plan.

The 1,073 acres of surface lands and 15,123 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
1 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 Aho
3519 Sourdough
Bozeman, MT 59715
kaho@montana.edu

Dmaynard@surfside.net (Richard P. Maynard)

04/15/03 11:31 PM

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

Kellie 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 existing unspoiled fish and wildlife habitat. Man's history repeatedly destroys that which he yearns to own and use. Please
1 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
331 Ogle St. #D
Costa Mesa, Ca 92627
Dmaynard@surfside.net

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 16, 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 entails a lengthy process.

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 Hamelton

CAROLE 'KNIFFY' HAMILTON
Forest Supervisor

"Eric K. Simpson"
<eks@simpsonfinancial.com>
05/26/03 07:22 AM
Please respond to "Eric K. Simpson"

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

Monday, 26th May 2003 P&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 community 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 those 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.

Per the web site map, your 'in the river bottom piece' is about 400 + 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 this 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

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 reply on how we might help and work together.

I am scheduled to be at the ranch in mid-June. Telephone: 307 733 0188.

I could visit your offices say on Thursday or Friday, 19th or 20th June 2003 at 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
4012 Jarvis Lane
Wilson, WY 83014

TSR Limited, 11 Pollock's Path, House B, The Peak, Hong Kong

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

eks/es