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 Martin,

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 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. 1

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. 2

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.

Some suggestions for the parcels are listed below: 3

PARCEL	PREFERRED 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

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

"lexey wauters"
<bllarson@hotmail.com>

05/13/03 05:41 PM

To: pinedale_wymail@blm.gov
cc:
Subject: Snake River RMP/Kellie Roadifer and Prill Mecham

Dear Ms.Roadifer and Ms. Mecham:

Thank you for this oppurtunity 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 River Management Plans (RMP). I would like to foward 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 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 oppurtunity 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.

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. An 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 aggreement 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 managment by that agency or management by a subsidiary group,

3.A teired 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 NE of the Wilson Bridge (Parcels 9 and 10), Fish and Game would own/manage parcels adjacent to the Elk 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.

Lexey Wauters
PO 124
Teton Village, WY 83025
bllarson@hotmail.com

"Ian Levenson"
<ilevenson@phenogenex.com>
05/14/03 07:16 PM

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

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 as 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 Levenson
Home Phone: 307-690-5893
Work Phone: 307-739-8990 ext. 2
Fax: 307-739-8992

Carolkjh@aol.com
05/14/03 10:36 PM

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

Dear Team Leader:

1 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 26 at 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 52, that the BLM parcel is "better for landing 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 land "offers 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 workshops 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 ranches, there would be little open space left on the valley floor.

2 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 2576
Jackson, WY. 83001
307-733-2161

"Mike Varilone"
<mvarilone@hotmail.com>

05/15/03 09:49 AM

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

Dear sirs,

I am a Jackson Hole Valley resident of 13 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 1 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 here.

2 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 them 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

cwauters
<cwauters@onewest.net>

05/15/03 10:44 AM

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

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.

1 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 Wauters
POBox 85
Teton Village, WY 83025

"Jon"
<jonw@livewaterproperties.com>
05/15/03 10:52 AM

To: <pinedale_wymail@blm.gov>
cc: "'Brenda Wylie'" <BWylie@crouchfirm.com>, <mjasin@mail.hockaday.edu>, <Alex@livewaterproperties.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 on 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 2 be preserved, and possibly even allow for spots that can be reserved for overnight camping. The historic public access (between the dikes) along the Snake has worked. I am concerned that placing these lands in the hands of private parties could lead to significant conflict over access in the future. Moreover, the 3 fact that these lands will be beyond the public's control, is of even more concern. This property has been effectively policed 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 Wylie
Live Water Properties
PO Box 9240
460 S. Cache St.
Jackson, Wyoming 83002
jonw@livewaterproperties.com
307-734-6100 (office)
307-690-9790 (cell)
307-734-6102 (fax)

"Guy Turck"
<gturck@wyom.net>
05/15/03 02:25 PM

To: <pinedale_wymail@blm.gov>
cc:
Subject: Proposed BLM land sale of 1073 acres along the Snake River, Jackson Hole, WY

May 15, 2003

Re. Proposed BLM land sale of 1073 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 1073 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 in 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 Turck
PO Box 10760
Jackson, WY
gturck@wyom.net

"Gregg Dean"
<deanhouse@rmisp.com>

05/15/03 08:44 PM

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

Dear Sirs,

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 corrider and its riparian lands. Public land should remain public and 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
And Dick Ream box 472 Wilson, Wyoming 83014

"tetontrout"
<tetontrout@onewest.net>

05/14/03 08:36 AM

To: "BLM Snake R. RMP team leader BLM" <pinedale_wymail@blm.gov>
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 in Teton Co,Wy.

2 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 536,Wilson,Wy 83014

"Alex Maher" <alex@livewaterproperties.com>

05/14/03 05:18 PM
Please respond to "Alex Maher"

To: "Tim Lindstrom" <tim@jhlandtrust.org>, <pinedale_wymail@blm.gov>
cc: "John Holland" <jholefisher@yahoo.com>, "Shane Hollingsworth" <tormack@onewest.net>, "Jon Wylie" <jonw@livewaterproperties.com>, "Jay Buchner" <jbuchner@wyoming.com>, "Jim Broderick" <JimmyBro@aol.com>, "Macye Lavinder K. Maher" <macye@livewaterproperties.com>
Subject: 1073 acres on Snake River

Dear Mr. Lindstrom and Snake River RMP Team Leader,

I am very interested in seeing a map of the 1073 acres in question for sale to the Land Trust and resale 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 parcels.

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 raises 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.

Besides the access that these lands provide to the fishing public, they constitute one of a very few places in 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.

Alex Maher - Broker/Owner
Live Water Properties, LLC
Box 9240
Jackson, WY 83002
www.livewaterproperties.com
307.734.6100
307.734-6102 fax
307.690-9515 cell

"peter freymann"
<pfreymann@hotmail.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 Pruzan and the Conservation Alliance. The sale 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

Lee Riddell
<lriddell@wyoming.com>

05/16/03 12:12 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 1428
Wilson, WY 83014
307-733-8093, x10

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.

I The wildlife corridors map clearly points to the RMP areas 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 intents regarding the RMP.

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

Sincerely,

Stu Levit

RECEIVED
MAY 19 2003
PINEDALE RESOURCE
AREA OFFICE

P.O. Box 6669 • 40 East Main Street, Suite 2 • Bozeman, Montana 59771 • Tel. 406-586-8175 • Fax 406-586-8272
P.O. Box 1524 • Sandpoint, Idaho 83864 • Tel/Fax 208-263-5082
Email info@wildlands.org • 100% Post-consumer Recycled Fiber • 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 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.

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 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

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

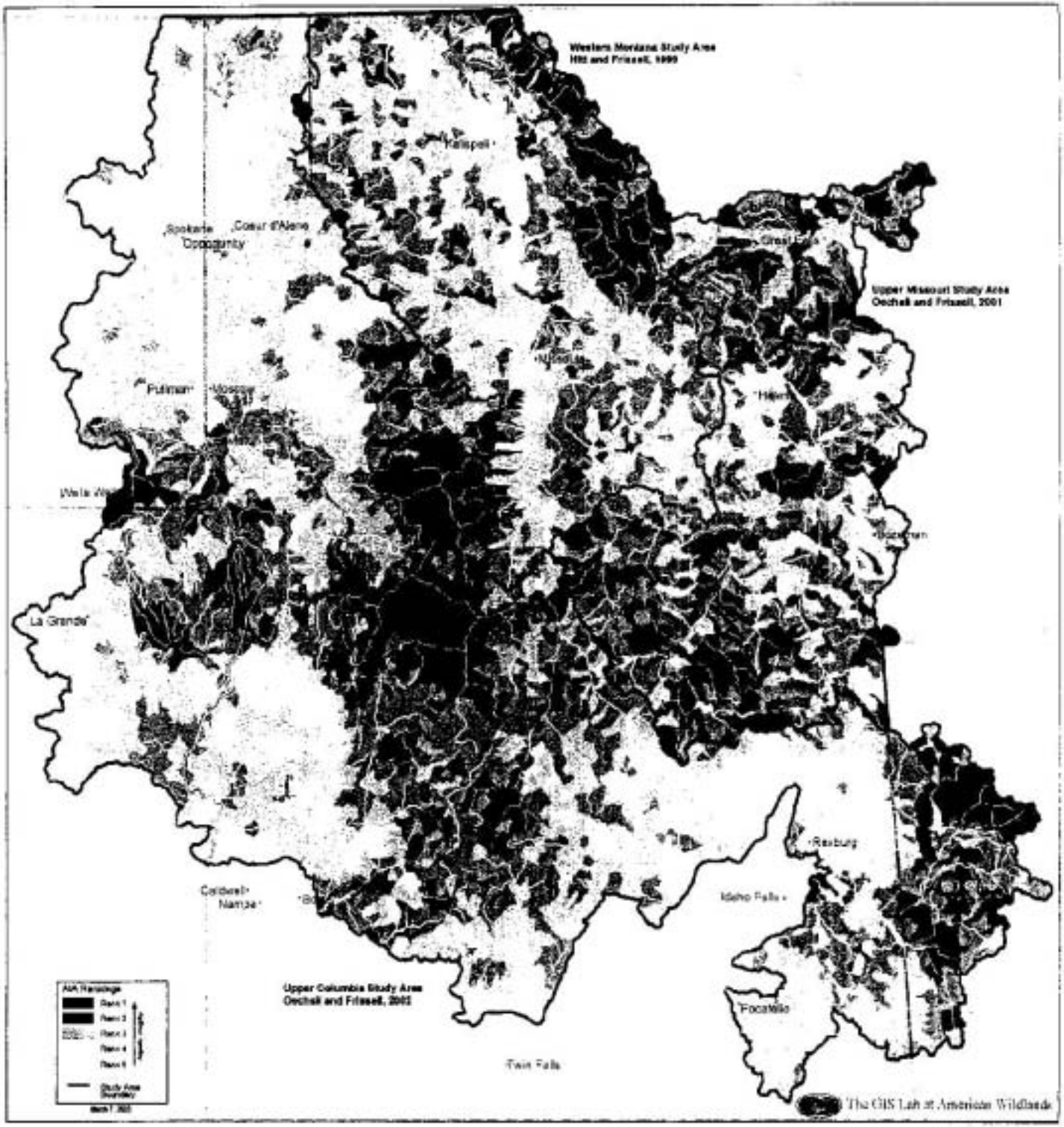
In conclusion, we support the BLM's general direction in the draft Snake River RMP – which is to place a high priority on preserving fish and wildlife, low-impact recreation, and visual resources, and to prohibit activities such as mining, oil and gas development, and expanded grazing and OHV use that 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.

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 native aquatic diversity in the Northern Rockies. The project utilizes a computer-based Geographic Information Systems (GIS) model to analyze the current condition 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,
- -- native/non-native fish ratio and genetically pure natives, 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 Green. The analysis yields a relative ranking of predicted integrity and conservation value of subwatersheds. The results identify the range from high ecological integrity, where native aquatic communities are still relatively intact, to low ecological integrity, where aquatic communities are either naturally depressed or have been degraded.



Yellowstone to Yukon Conservation Initiative

American Wildlands

Pacific Rivers Council

Potential Movement Corridors for Large Carnivores
Teton County, WY

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

May 16, 2003

Prill 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.

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 parcels as they relate to the various values identified above, it would be premature in the extreme to even consider a change in ownership.

From a management perspective, there are undoubtedly several practical, efficient and even 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

Post Office Box 2062
Jackson Hole, Wyoming 83001

phone - 307-733-4534
fax - 307-733-9562

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 Bute and connecting to Spring Gulch Road as a possible additions 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 Vandenberg
Executive Director, Friends of pathways

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The Snake River Fund
PO Box 574
Jackson, WY 83001
(307) 739-5417
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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 /s/ *Frank Ewing* /s/

Aaron Pruzan, President
(307)-733-2471

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.

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Sava Malachowski.

MR. MALACHOWSKI: Yes. Do I need to go somewhere?

MR. MURPHY: Yes, come up here, Sava, please.

MR. MALACHOWSKI: Do I need to spell my name?

THE REPORTER: Yes.

MR. MALACHOWSKI: The last name is M, like Mary, A-L-A-C-H-O-W-S-K-I. First name is Sava, S-A-V-A, address?

THE REPORTER: Yes, please.

MR. MALACHOWSKI: P.O. Box 836, Wilson, Wyoming, 83014. Phone number?

THE REPORTER: Okay.

MR. MALACHOWSKI: 307-739-2256.

THE REPORTER: Thank you.

MR. MALACHOWSKI: I'm a little confused with the sake because I was expecting there would be more of the public here, but I think most of you guys are the government people. Right?

I would just like to say that I'm really happy that this process is open and I would like to personally see that whatever is the outcome of this process will insure that these lands remain in the public hands. Either they will stay with the BLM and will be managed for -- left along the way they've always been or they will be transferred to the responsible local agency which will manage them for the

benefit of -- especially wildlife. That's one of the resources threatened the most in Teton County. And then there is a reasonable and safe way of doing it, I would like to see the public access allowed on these lands.

One thing that I would not like to see, and I would like to stress this very strongly, is a transfer of this land to public -- to private ownership, which would then allow any kind of real estate involvement, any kind of build up of housing, mansions, whatever type of buildings which would impede the survival of wildlife on those lands.

That's all I have to say. Thank you.

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
4000 Airport Parkway
Cheyenne, Wyoming 82001

In Reply Refer To:
ES-61411/W.02/WY6913

May 14, 2003

Memorandum

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

From: Jodi L. Bush, 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 action, or RMP amendment where appropriate.

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2 Chapter 4, Page 155, Lines 11-13. 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 Schubert 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)