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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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