



NRA-ILA

The logo for Safari Club International (SCI), featuring a globe icon above the letters "SCI" and the tagline "FIRST FOR HUNTERS" below it.

SCI

FIRST FOR HUNTERS

November 10, 2011

BLM, Phoenix District Office
ATTN: LS-SDNM RMP
21605 North 7th Avenue
Phoenix, Arizona 85027

RE: Comments on the Draft Resource Management Plan for the Sonoran Desert National Monument.

Dear BLM:

The Draft Resource Management Plan (DRMP) addresses the management of nearly a million acres of public land managed by the Lower Sonoran Field Office, as well as management of the 486,400-acre Sonoran Desert National Monument (SDNM). The following comments are being submitted jointly by the National Rifle Association (NRA) and Safari Club International (SCI). Our comments focus on the alternative management approaches to recreational shooting in the SDNM. The management alternatives for recreational shooting for the SDNM are the following:

Alternative A (current practice – “no action” alternative): no restrictions

Alternative B (greatest human use): shooting allowed on 96,441 acres or 19.8% of SDNM

Alternative C (balancing resource protection and human use): shooting allowed on 1,136 acres or 0.2% of SDNM

Alternative D (focus on preservation/conservation): no shooting allowed on SDNM

Alternative E (BLM's balanced approach): no shooting allowed on SDNM

The NRA defends the Constitutional right of American citizens to possess and use firearms; promotes hunter safety and advocates and defends hunting as a viable and necessary wildlife conservation tool; and fosters and promotes the shooting sports. The NRA provides funding and expertise for the development of shooting ranges to promote safe gun handling and interest in hunting and the shooting sports.

SCI is a nonprofit IRC Section 501 (c)(4) corporation with approximately 53,000 members worldwide. SCI's mission is to protect the freedom to hunt and to promote wildlife conservation worldwide. Three of its chapters are in Arizona and SCI members actively shoot at both public and private ranges throughout the state.

Our position is that Alternative E (the BLM's preferred alternative) be amended to identify specific areas within the SDNM where target shooting can continue. We recommend that the BLM apply resources, as it does for other recreational activities, to ensure that these areas provide for a safe shooting experience. Further, we recommend that BLM step up enforcement of illegal dumping and work with national hunting and shooting sports organizations to address issues created by a small minority of unethical and irresponsible recreationists. And, finally, that the BLM implement the education outreach campaign designed by Tread Lightly! called “Respected Access is Open Access.”

The DRMP has failed to identify an acceptable and responsible management plan for the closure of recreational shooting in the SDNM; an activity which the DRMP acknowledges is a traditional and historic use of the area. The DRMP is deficient because:

1. It fails to provide sound justification for closing the SDNM to recreational shooting activities as proposed in Alternatives D and F (the BLM's preferred alternative);
2. It fails to frame recreational shooting in Alternatives B and C as viable and realistic proposals for the public's consideration;
3. It fails to provide a reasoned analysis for areas opened for shooting in Alternatives B and C, suggesting that the sites are an arbitrary decision;
4. BLM has preconditioned the outcome of the NEPA process by stating that recreational shooting is not an appropriate public use in the SDNM;
5. It has ignored the need for access and opportunity by the surrounding community for safe places to shoot; and,
6. It proposes closure as the only response to solving problems associated with recreational shooting and dismisses measures that would effectively reduce and/or eliminate the vast majority of resource impacts.

The DRMP makes a strong case for the need keep some number of shooting sites open in the SDNM. The document states that the interest in and need for places to shoot is growing in the state, that demand for this type of recreation in the SDNM has been increasing for the last five years, and that urban encroachment on private lands and population growth in Phoenix has driven recreational shooters to increasingly use the SDNM because people are finding it difficult to find places to target shoot. It amplifies this further by noting that the population growth and subsequent urbanization of the American West has caused edges of property to become closer, the outskirts of communities more crowded, remote areas fewer, and closures to recreational shooting more common.

Specifically, the DRMP states that "Arizona's broad public demand for places to shoot is being shifted to public lands managed by the BLM. Continued demographic changes in Arizona are straining the limits of where and how recreational target shooting can be accommodated." Elsewhere the DRMP states that "target shooters are being pushed farther out from metropolitan areas seeking lands (private, State, and Federal) for target shooting. Urban growth and development has made it increasingly difficult for target shooters to find unstructured areas without affecting other users or natural resources." The DRMP then lists the number of state and federal lands that have been closed because of encroaching development and notes that expanding communities no longer allow target shooting within incorporated limits.

In the face of a documented need to find safe places for the public to shoot in a state in which public lands are largely in federal ownership, BLM's response is to be an advocate for more closures by proposing in Alternatives D and E (preferred alternative) to close 1/2 million acres of public land to recreational shooting. With that, BLM casts adrift its management responsibility for providing areas that people can engage in target shooting. The BLM states that it will not lease land for the development and management of shooting ranges, it will not provide any infrastructure that would promote safe shooting, and it will not spend any effort to manage recreational shooting. The only engagement that BLM intends to take regarding recreational shooting is to use its authority under the Federal Lands Policy Management Act to sell land or through its authority under the Recreation and Public Purposes Act to patent land. However, the BLM says that in neither case can this be done because it would not be "compliant with the provisions provided under the Monument proclamation or management goals and objectives identified in the DRMP." Thus BLM did not present or analyze these as alternatives in developing the DRMP.

The designation of national monuments does not preclude hunting or recreational shooting, including the designation of SDNM. However, the BLM is creating its own policy that national monuments should be closed to recreational shooting. It is evident in a statement that BLM made to the press regarding the

DRMP. The SDNM manager stated that "The monument's not an appropriate place to have a target shooting" in an article published October 14, 2011 by Judson Berger for FoxNews.com titled *Gun Groups Decry 'Unacceptable' Proposal to Ban Target Shooting on Western Parkland*. SDNM DRMP_100052

A similar statement was made by BLM staff at the time the DRMP for Ironwood was released for public comment. The recently released final DRMP for Ironwood recommends the total closure of the monument to recreational shooting. This comes as no surprise. These public statements by BLM prejudice not only the development of sound and responsible management proposals for the national monuments, but also prejudice the public review process. The BLM's statement that national monuments are not appropriate for recreational shooting lacks grounding in agency policy or in statutory authority.

It is clear that the BLM is conflicted by the obvious need to provide for recreational shooting opportunities and its unwritten policy that national monuments should be closed to shooters. Not only is it evident in two of the four alternatives that would close the SDNM to shooters, but it is clear that the treatment of recreational shooting in Alternatives B and C is nothing more than a throw away proposal which is designed to recognize the long history of recreational shooting on these public lands and the need for places to shoot, but provides no analysis that supports either management proposal. Alternative B would allow shooting on over 96,000 acres, but the BLM's GIS analysis eliminated all but two sites as highly suitable for recreational shooting because of the presence of monument objects, desert tortoise habitat, the Anza Historic trail, and unsuitable terrain. Thus, Alternative B has limited to no serious viability as an alternative for public consideration as it pertains to shooting.

Alternative C winnows the areas potentially suitable for recreational shooting down from 63 sites used by shooters as stated in the DRMP to six sites totaling slightly over 1000 acres. But the analysis debunks this as a viable alternative by stating that the BLM does not compromise on the safety of its visitors and that improving user and visitor safety at one of the locations would require direct management, funding and development and then goes on to explain why it cannot sell or patent some land for recreational shooting. In essence the BLM says that Alternative C is not viable because the BLM will not accept any management responsibility for recreational shooting sites. This DRMP sets the stage for what the BLM wants to have as the only course of action: closure of the SDNM to shooters.

The DRMP states that challenges for BLM's management of recreational shooting are related to urbanization, the need for public safety, and the protection of Monument objects and natural resources. There is no argument that suburban expansion of numerous cities in the west has put increasing pressure on our public lands to respond to greater numbers of people looking for places to recreate and that the need to provide for public safety and resource protection are responsibilities expected of the federal land manager. But unlike management of other public uses, the BLM's response to challenges to provide for recreational shooting is simply to walk away from the challenge. The DRMP states that issues arising from recreational shooting are concern for health and safety of visitors, abandoned household refuse, damage to natural resources, and vandalism. Although the DRMP acknowledges that recreational shooting in its history within the SDNM has not caused specific harm to shooters or non-shooters, setting aside specific areas for recreational shooting and providing infrastructure like berms and target holders will keep shooting safe and reduce visitor conflict. Illegal dumping is a plague upon the land scape and something that cannot be placed on the shoulders of the shooters. Closure of public land to recreational shooting does not prevent people from illegally dumping.

As regards damage to property and natural or cultural resources, this challenge was incorporated in a Memorandum of Understanding (MOU) signed by the BLM and 40 national hunting, fishing, sport shooting and wildlife conservation organizations in 2006. Under the Federal Lands Hunting, Fishing, and Shooting Sports Roundtable MOU, the parties pledged to work together to increase access and opportunities for hunting, fishing, and recreational shooting and to resolve issues associated with these activities. The non-governmental organizations have responded in every instance when a federal land manager has requested assistance in getting sites cleaned up, in reaching out to the local shooting community, and in seeking volunteers to assist the land manager in encouraging safe and responsible shooting by the public. There is no record that a manager of the SDNM ever contacted the BLM's MOU partners and asked for assistance. It is apparent that the intent was not to address and solve issues so as

to keep areas open for recreational shooting, but to let areas be degraded and allow conflicts to develop. In order to build a case for closing the SDNM.

The MOU lists resources that are available for responding to issues and opportunities associated with hunting and shooting. But MOU partners took a step further by funding research in advance of developing an education outreach campaign in partnership with Tread Lightly! The campaign was launched as the *Respected Access Is Open Access* campaign. Today it is being used by recreational interests beyond hunting and shooting. Materials created by Tread Lightly! are available free of charge for downloading for placement in kiosks, visitor centers and other public places. In fact, the BLM has a link to Tread Lightly! on a page devoted to target shooting on BLM Arizona lands. The non-governmental organizations have stepped up to the commitments they pledged by signing the MOU, but they have not seen a similar level of commitment from the BLM. If it were otherwise, the BLM would have reached out to its national partners to address recreational shooting in the SDNM.

The DRMP says that the public land surrounding the SDNM remains open to shooting as if that were was an acceptable justification to drive recreational shooting out of the SDNM. The DRMP does not provide any information as to the effect of closure of the 63 areas within the SDNM on access (travel distance) and opportunities available to those displaced shooters on the other public lands. It does not analyze the impact of forcing shooters from SDNM onto other public land, nor how the increase in shooters will affect the safe use of sites elsewhere. Neither does the DRMP address how BLM will manage those sites to ensure that the condition of those sites will not be grounds for future closures. It is clear that the BLM is using the designation of national monument to eliminate a recreational activity it does not choose to manage. The BLM is simply keeping other areas open to recreational shooting until such time as it can find an opportunity to close those areas. This is not management. Instead, the BLM is thrusting its management responsibilities upon neighboring state and other federal lands to respond to what the DRMP so pointedly stated as the need to find places to accommodate the growing numbers of people who enjoy target shooting.

In summary, none of the Alternatives is acceptable as they relate to recreational shooting. The BLM needs to take a proactive position of finding suitable sites from the 63 sites that have been used by shooters and commit resources to create safe shooting venues, as well as working with the local community of shooters to keep sites clean and promote responsible shooting. In addition the BLM should call upon its MOU partners to assist in identifying suitable sites and implementing the *Respected Access Is Open Access* outreach campaign to shooters, as well as all recreationists, on BLM lands.

Sincerely,



Susan Recce
Director
Conservation, Wildlife & Natural Resources
National Rifle Association
11250 Waples Mill Road
Fairfax, VA 22030



Kevin Anderson
President
Safari Club International
501 7th Street, NE
Washington, D.C. 20002