

*Wildlife and Hunting Heritage
Conservation Council*

April 22, 2016

The Honorable Sally Jewell
Secretary of the Interior
1849 C Street NW
Washington, D.C. 20240

RE: Comments on Scoping Phase of Recreational Shooting Plan Amendment to the Resource Management Plan for the Sonoran Desert National Monument

Dear Secretary Jewell:

The Wildlife and Hunting Heritage Conservation Council (Council) is taking the opportunity to submit comments for the public record on the scoping phase of the recreational shooting plan amendment for the Sonoran Desert National Monument (SDNM).

The Council has a long-standing interest and concern in the preservation of opportunities for recreational shooting in the SDNM because shooting is a traditional public use of these lands. The Council became involved in this issue when the BLM announced its intent to close the nearly half-million acre SDNM to recreational shooting during the development of the Resource Management Plan (RMP).

Members of the Council visited the SDNM on April 10, 2012 to look at several of the shooting sites and to have a better understanding of the issues and opportunities associated with this activity. Attached is a copy of the Council's May 14, 2012 letter to Director Abbey following that field visit. Of the some 63 sites that the RMP identified as being used by recreational shooters, it was clear from the field visit that there are areas of the SDNM where recreational shooting can continue in a safe setting without conflicting with the purposes for which the monument was established. In its letter, the Council offered a number of recommendations, recognizing the balance that the BLM must strike between protecting the SDNM's objects and values and providing for public recreation.

In September of 2012, the BLM reversed its decision to close the SDNM to shooting and instead adopted a new management alternative identical to the "No Action" alternative with respect to shooting. That decision resulted in a lawsuit and subsequent court ruling that vacated the portions of the Record of Decision, the RMP and the final Environmental Impact Statement associated with shooting. This led to the development of a recreational shooting plan amendment to the RMP.

In its comments and communications with the BLM over these past years, the Council fully recognized that areas of the SDNM would be closed to recreational shooting. The Council never supported allowing this activity to occur anywhere and everywhere in the SDNM. Instead, the Council has all along supported a sound process in identifying appropriate areas where recreational shooting can take place,

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and made a commitment to play an active role in engaging the shooting community to assist the BLM in the management of this activity.

We strongly encourage the BLM to work with the Council, the Arizona Game and Fish Department, and the Federal Lands Hunting and Shooting Sports Roundtable to identify suitable, safe and accessible areas of the SDNM where shooting can take place at a level that meets and anticipates the future needs of the surrounding communities, while ensuring that the agency meets its obligations to protect the objects and values for which the SDNM was established.

The Bureau of Land Management, U.S. Forest Service, Arizona Game and Fish Department, and Tread Lightly! have teamed up with the shooting sports community in Arizona resulting in a strong partnership to promote responsible recreational shooting. This partnership has been invaluable in the encouragement of responsible behaviors on public lands within the recreational shooting community and is providing a more balanced approach between education versus regulating the public. This effort should be recognized in the development of the EIS.

Sincerely,

A handwritten signature in black ink that reads "John Tomke". The signature is written in a cursive, flowing style.

John Tomke, Chair
Wildlife and Hunting Heritage Conservation Council

Enclosure: Council letter of May 14, 2012

Cc:
BLM Director Neil Kornze
BLM Arizona State Director Ray Suazo

Wildlife and Hunting Heritage
Conservation Council

May 14, 2012

Mr. Robert Abbey, Director
Bureau of Land Management
1849 C Street NW
Washington, D.C. 20240

Dear Director Abbey:

In response to the possible closure of the Sonoran Desert National Monument (SDNM) to recreational shooting, a group of the Wildlife and Hunting Heritage Conservation Council (Council) members visited the SDNM on April 10, 2012. Members of that sub-group included Jeff Crane, Bob Model, Steve Sanetti, John Tomke (Chair), and Joshua Winchell (Designated Federal Officer). We were joined by Larry Voyles, the Director of Arizona Game and Fish Department, who represented the Association of Fish and Wildlife Agencies. Our team was ably hosted by Ray Suazo, Arizona State BLM Director and several members of BLM staff, including Emily Garber, June Shoemaker, Rich Hanson, and Melinda Mahoney. The Council members sincerely appreciated the willingness of BLM staff to engage with the members of the Council.

Following the tour, Council members also met with representatives of the Public Lands Foundation and Tread Lightly! who offered valuable input. The comments provided in this letter are the result of the site visit, the subsequent meeting, and a review of relevant background materials.

When then Secretary Bruce Babbitt recommended BLM keep management of the SDNM it was understood that these special landscapes would remain open to the traditional recreational activities that had taken place for decades. Recreational shooting is one of those traditional activities. Dispersed recreational shooting is a valued recreational activity unto itself and is also a gateway into more formal shooting sports and hunting. Recreational shooting is a critical element in the process of becoming a hunter and shooting sports enthusiast, and given the importance of hunting and recreational shooting in the funding of wildlife conservation in America it is imperative that we do all we can to further recruitment and retention of hunters and recreational shooters.

We recognize that BLM has a vital mandate to protect the objects of the SDNM and we agree that you must take that responsibility seriously. Like you, we abhor irresponsible behavior on public lands whether it involves recreational shooters, off-highway vehicle (OHV) users, hikers, or those who practice illegal dumping. Unethical behavior, however, is not limited to recreational shooters. As a Council, we stand ready to assist in providing recommendations to reduce illegal and irresponsible activity on BLM lands.

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The impact of a total closure of the SDNM to recreational shooters would have been exacerbated by recent actions by other governmental organizations. The U.S. Forest Service has recently closed 800,000 acres of the Tonto National Forest. Two new county parks have been created, both of which are closed to recreational shooting. A closure of SDNM would have added another 480,000 acres to that tally. These actions beg all these agencies, along with Arizona Game and Fish, to set clear objectives for how much land they wish to maintain for dispersed recreational shooting near the rapidly growing Phoenix metro area.

Research conducted by Responsive Management indicates that shooters are willing to drive 30-45 minutes to participate in their sport but sixty minutes presents a clear barrier. Of the **1,809,559 acres** of public land within a 30 mile ring around Phoenix, less than 10% of that is open to recreational shooting (see map, enclosed). Only 38,473 acres of the lands that remain open are BLM managed lands. With more than four million residents in the Greater Phoenix area, there is a need for better coordination amongst all public land managers.

Finally, BLM staff during the site visit raised an issue about recreational shooting and potential liability issues. We heard that backstop berms for concentrated recreational shooting areas could not be created on the SDNM because of liability concerns and BLM policy. Yet BLM staff referred to ongoing infrastructure improvements for OHV usage. However, the safety and litigation history for OHV users is *significantly* more active than that for recreational shooters. During the site visit, BLM staff acknowledged they were unaware of safety incidents associated with shooting or harm to desert tortoises as a result of recreational shooting.

On our visit we were shown areas that seemed well suited to concentrated recreational shooting on BLM lands both on and off the monument itself. Recognizing the challenges that BLM faces at the SDNM, we offer some recommendations. This program should be based upon a process that considers the following:

1. Access to a site from a road.
2. Ability to clean up and keep sites clean (i.e. can a dumpster be brought in on a volunteer cleanup day?).
3. Presence of cultural sites and special habitats.
4. Proximity of other recreational activities or uses.
5. Improvements that could make a site suitable for recreational shooting.
6. Level of shooter use of the sites and projected use during the life of the RMP.

BLM staff raised a small number of concerns about recreational shooting on public lands, concerns we believe can easily be addressed:

1. Perceived liability that BLM says prevents them from identifying/designating shooting sites.
2. Unwritten policy of not allowing improvements such as berms to be made to shooting sites.
3. Resistance of BLM to modify other recreational activities (like rerouting a hiking trail), if it would make a site suitable for target shooting.

If a sound process is developed for decision making regarding recreational shooting on BLM lands, *it can be used on other monuments or any other public lands.*


Under such a process some of the most sensitive areas would be closed to recreational shooting, with other areas remaining open to dispersed recreational shooting. The process would also identify areas suitable for concentrated recreational shooting. The Council offers to help BLM develop programs to identify and secure volunteer groups to serve as "site stewards" for those areas. Tread Lightly!, for example, has a long history of facilitating partnerships with the hunting and recreational shooting community including development of the "Respected Access is Open Access" outdoor ethics education campaign. This campaign uses messages tailored to recreational shooting that can be made available to

monument staff for posting and distribution. It is the objective of the Council to play an active role in engaging the shooting community to assist BLM in the management of recreational shooting on these Sonoran Desert lands.

We suggest evaluations of the impacts on the natural objects in all of these SDNM areas at three year intervals. The Arizona Game and Fish Department are likely partners to assist in evaluating impacts on species like the desert tortoise. A comprehensive assessment at the end of the pilot program could lead to further refinements of the program.

We stand ready to meet with you and Secretary Salazar to help develop a pilot program for the Sonoran Desert National Monument that protects that treasured landscape as well as the peoples' ability to enjoy it.

Sincerely,

A handwritten signature in black ink that reads "John Tomke". The signature is written in a cursive, flowing style.

John Tomke, Chair
Wildlife and Hunting Heritage Conservation Council

Enclosure: Recreational Shooting Map

Cc: Secretary Ken Salazar, Department of the Interior