

**From:** Williams, Timothy  
**To:** [Bowman, Randal](#); [Howarth, Robert](#)  
**Subject:** Fwd: FW: Comments to DOI on national monuments  
**Date:** Friday, May 26, 2017 12:08:46 PM  
**Attachments:** [Zinke.pdf](#)  
[Canyons of the Ancients National Monument.pdf](#)  
[Ironwood Forest National Monument \(IFNM\).pdf](#)  
[Comments on SDNM recreational shooting plan.docx](#)  
[Comments on Prehistoric Trackways NM.docx](#)

---

----- Forwarded message -----

**From:** Recce, Susan <[SRecce@nrahq.org](mailto:SRecce@nrahq.org)>  
**Date:** Fri, May 26, 2017 at 11:58 AM  
**Subject:** FW: Comments to DOI on national monuments  
**To:** "Williams, Timothy" <[timothy\\_williams@ios.doi.gov](mailto:timothy_williams@ios.doi.gov)>

Hi Tim,

Just as an FYI, attached is the letter of comments I put in the mail today to Secretary Zinke with respect to his review of monuments designated under the Antiquities Act, as well as the 4 documents that support the comments.

I hope you have a very nice holiday.

Susan

--

**Department Of The Interior**

External and Intergovernmental Affairs

Timothy Williams

[timothy\\_williams@ios.doi.gov](mailto:timothy_williams@ios.doi.gov)

Office: (202) 208-6015

Cell: (202) 706-4982

NATIONAL RIFLE ASSOCIATION OF AMERICA  
**INSTITUTE FOR LEGISLATIVE ACTION**  
11250 WAPLES MILL ROAD  
FAIRFAX, VIRGINIA 22030



**NRA**

May 26, 2017

The Honorable Ryan Zinke  
Secretary of the Interior  
18<sup>th</sup> and C Streets, N.W.  
Washington, D.C. 20240

RE: Comments on the Executive Order 13792 Antiquities Act Monuments Review

Dear Secretary Zinke:

The NRA appreciates the opportunity to comment on national monuments that have been designated or expanded under the Antiquities Act (Act) since January 1, 1996, as directed by Executive Order 13792 (EO) of April 26, 2017.

Among other provisions of the EO, Section 1 states that designations under the Act should *"appropriately balance the protection of landmarks, structures and objects against the appropriate use of Federal lands and the effects on surrounding lands and communities."* THE EO lists seven factors for the Secretary's consideration in this review.

One purpose of this letter is to support the application of Factor iii to the review of monument designations or expansions covered by the EO. Under Factor iii, the review should examine the *"effects of a designation on the available uses of designated Federal lands, including consideration of the multiple-use policy of the Federal Land Policy and Management Act, as well as the effects on the available uses of Federal lands beyond the monument boundaries."*

By way of background, the NRA is a signatory to the Federal Lands Hunting, Fishing and Shooting Sports Roundtable Memorandum of Understanding (MOU) of 2014. We signed the MOU with the Bureau of Land Management (BLM), Fish and Wildlife Service, Forest Service, and the Army Corps of Engineers. Forty-three national hunting, wildlife conservation and shooting sports organizations are signatories to the MOU. The NRA and the Forest Service were the first signatories to the original MOU dating back to 1999.

The purpose of the MOU is to:

*Develop and expand a framework of cooperation among the Parties at the national, regional, and local levels for planning and implementing mutually beneficial projects and activities related to hunting, fishing and shooting sports conducted on federal lands. These activities and projects will complement the respective missions of the Parties and serve the mutual interests of the Parties and the public.*

The NRA has a long history of involvement in the development of resource management plans for lands managed by the BLM because of the effects these plans have on sportsmen and women who depend upon public lands for their recreational pursuits, specifically the enjoyment of hunting and recreational shooting. Although hunting has not been significantly affected by monument designation, the same cannot be said for recreational shooting. Time and again we have expressed concern over the use of monument designations by the BLM to justify total closure of a national monument to recreational shooting, an activity that had been a historic, legitimate, and popular use of the public lands before they were designated a national monument.

On the EO list of national monuments under review are Ironwood Forest National Monument and Canyons of the Ancients National Monument. The BLM used the resource management planning process to close both of these monuments to recreational shooting. Attached are the comments we submitted on the draft resource management plans.

Also on the list is the Sonoran Desert National Monument. It encompasses nearly one-half million acres, or eleven times the size of the District of Columbia. The BLM intended to close the entire monument to recreational shooting, but as a result of a series of events that occurred over the last several years, a recreational shooting management plan was prepared. By court order, the BLM is to finalize the plan this fall. Attached are the comments we submitted on the draft plan.

Although it does not meet the criteria for this review (under 100,000 acres and designated by Congress), Prehistoric Trackways National Monument is another example of how the planning process was used to close public lands to recreational shooting after a monument was designated. Attached are the comments we submitted on the draft plan.

In the resource management plans, the BLM constructs the management alternatives to either allow recreational shooting to continue everywhere in a monument or nowhere. The NRA recognizes that the BLM has the responsibility to protect the resources and values for which a monument is designated; thus, we do not advocate an uber alles approach to the management of recreational shooting. However, there are areas within these monuments that should have remained open for shooters. Setting aside these areas would not have diminished BLM's management responsibilities under the monument designation.

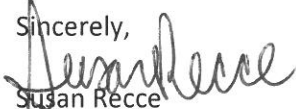
BLM's justification for closure is that there are millions of acres of surrounding Federal lands for people to go shooting. None of the management plans analyzed the impact to these recreationists of closing the national monument to shooting, nor the impact on lands beyond the monument's boundaries. No information was provided on the level of access to non-monument lands; the proximity of those lands to population centers; whether the lands could absorb the displaced recreationists without creating congestion and other problems; whether other areas were safe for shooting; and what the impact of closure would be on non-Federal, adjacent lands.

One remedy to BLM's arbitrary decisions to close a monument to recreational uses that were historic, legitimate and popular before the designation was proclaimed is to have Presidential Proclamations under the Act specifically state that hunting, fishing and recreational shooting are allowable activities within the monument and should be provided for. This would support Executive Order 13443 of August 16, 2007 entitled "Facilitation of Hunting Heritage and Wildlife Conservation."

In closing, the designation of a national monument on BLM lands does not result in an immediate closure of these public lands to recreational shooting. Instead, the impact is felt very decidedly in the resource management planning process that follows. Because of the pattern of monument closures to recreational shooting, the NRA strongly recommends that the Secretary include in the EO review the effects of monument management plans under *"such other factors as the Secretary deems appropriate"* as stated in Factor vii.

Again, the NRA appreciates the opportunity to submit comments and would be pleased to further discuss the management planning process as it relates to national monuments.

Sincerely,



Susan Recce

Director

Conservation, Wildlife and Natural Resources

[srecce@nrahq.org](mailto:srecce@nrahq.org)

703-267-1541

4 attachments

NATIONAL RIFLE ASSOCIATION OF AMERICA  
**INSTITUTE FOR LEGISLATIVE ACTION**  
11250 WAPLES MILL ROAD  
FAIRFAX, VIRGINIA 22030



**NRA**

January 24, 2008

Monument Manager  
Canyons of the Ancients National Monument  
27501 Highway 184  
Dolores, CO 81323

Dear Monument Manager,

The National Rifle Association appreciates the opportunity to comment on the draft resource management plan (RMP) for the Canyons of the Ancients National Monument. Our single concern is that the BLM is proposing to close the Monument to recreational shooting in its preferred alternative. We do recognize that the Monument will not be closed to hunting.

We are as concerned as the BLM about protecting the irreplaceable cultural resources found in the Monument from damage that has occurred because of the thoughtless actions of some visitors, including some who recreationally shoot in the Monument. Vandalism, litter, and safety concerns are examples of problems that prompted the NRA to spearhead the establishment of a working group (roundtable) made up of representatives from the land management agencies and national sporting organizations. The purpose of the roundtable was to identify problems associated with recreational shooting and solve them together. The original roundtable eventually led to the Federal Lands Hunting, Fishing, and Shooting Sports Roundtable MOU signed by the BLM, Fish and Wildlife Service, Forest Service and 40 organizations.

It would have been helpful, in the spirit and framework of the MOU, if we had been advised of these problems long before they were used as reasons to close the Monument to a recognized recreational activity on BLM lands. In the alert that our organizations received about the RMP, it states that *"we look forward to working with you to address any concerns you may have related to recreational shooting activities. Through your participation in this effort, we can move toward a common goal of improved management of public lands administered by the Canyons of the Ancient National Monument."* That would be a laudable objective but for the fact that the BLM has moved ahead with its RMP and preferred alternative to close the Monument to recreational shooting. It is unclear how we as signatories to the MOU can participate with the BLM in this effort.

The plan does not explain how many people recreationally shoot in the Monument and what is available to them outside of the Monument in terms of travel distance and accessibility to alternative sites. The plan states that *"there are currently no organized recreational shooting groups with Special Recreation Permits nor are there BLM-designated areas for recreational*

*shooting in the Monument.*” It is not clear what is meant by that statement. I believe BLM would agree that few recreational shooters on BLM lands are affiliated with a group or club. We are also not aware of any such groups receiving special recreation permits unless those permits are in association with formal shooting facilities. In that case, it is our understanding that BLM’s policy is to use the Recreation and Public Purposes Act to transfer public land to some entity, like a local government body, rather than manage and maintain infrastructure such as a shooting range on its own property. We have also been advised through our participation in the Roundtable that BLM does not designate areas for recreational shooting because of concerns over liability and hazardous materials (a separate issue altogether).

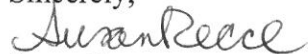
The MOU Roundtable offers technical assistance to public land managers and one of the elements of that assistance is to have an area examined for its suitability for recreational shooting. Both BLM and Forest Service managers have taken advantage of this service. Such expertise provides support to management in making decisions about the suitability of sites or areas, such as an entire monument, for recreational shooting. To unilaterally close the Monument without such a site review raises concerns about how BLM is addressing recreational shooting across the landscape. If the Monument by its terrain, by encroaching development, or other factors cannot provide properly for recreational shooting, then that should have been clearly articulated in the plan. To use vandalism, litter, and safety as the reasons to close the Monument bespeaks of BLM’s disinterest in working with its MOU partners to help solve these problems and raises significant concerns because the reasons used here for closure could easily be used for BLM lands elsewhere.

We have found that the BLM’s general approach to resolving issues related to recreational shooting is to close a problem area. The MOU was and is designed to identify approaches that resolve management issues and ensure the future of recreational shooting, which in many areas of the country is largely dependent upon access to federal lands. It would seem that in an area encompassing nearly 165,000 acres, some of those acres could be made available for recreational shooting, but again there is no way to assess that without some acknowledged professionals conducting a site visit. It is apparent that it was not BLM’s plan to do so.

The NRA recommends that the preferred alternative be amended to require a professional site visit and report before any final decision is made about recreational shooting in the Monument. The NRA and other MOU partners would be pleased to provide the BLM with a list of people who have experience in the field of recreational shooting to assist in this effort. That action would give credence to the statement above about working with your MOU partners to move toward a common goal of improved management for the Monument.

Again, thank you for the opportunity to comment on the RMP.

Sincerely,



Susan Recce

Director

Conservation, Wildlife and Natural Resources

NATIONAL RIFLE ASSOCIATION OF AMERICA

**INSTITUTE FOR LEGISLATIVE ACTION**

11250 WAPLES MILL ROAD

FAIRFAX, VIRGINIA 22030



**NRA**

May 30, 2007

Mr. Mark Lambert  
Planning and Environmental Coordinator  
Bureau of Land Management  
Tucson Field Office  
12661 East Broadway Boulevard  
Tucson, AZ 85748-7200

Dear Mr. Lambert:

The National Rifle Association (NRA) appreciates the opportunity to comment on the draft resource management plan (DRMP) for the Ironwood Forest National Monument (IFNM), the availability of which was announced in the Federal Register March 2, 2007. Our comments are singularly focused on the future of recreational shooting in Ironwood.

The DRMP sets out four management alternatives, two of which would allow dispersed recreational shooting throughout IFNM and the other two would completely close IFNM to dispersed recreational shooting. The manner in which these alternatives have been arrayed clearly reflects BLM's intent, regardless of public comment, to close IFNM to recreational shooting. As a result, BLM has failed to provide a responsive and responsible management approach to providing for an activity that has long been a historic use of these public lands.

Clearly, BLM is not going to select Alternative A, the no-action alternative. It reflects the status quo and is used as a basis of comparison in order to understand how IFNM will change under each of the other alternatives. Alternative D is the least restrictive, emphasizing continued human uses. However, the manner in which it treats recreational shooting makes it an unrealistic alternative in light of the management mandates that accompanied the designation of these public lands as a national monument. In our estimation, Alternative A and Alternative D are simply throw-away alternatives. The remaining two alternatives, including BLM's preferred Alternative C, close all 128,000 acres of IFNM to recreational shooting.

The DRMP recognized a variety of legitimate recreational uses that were being made of the area, including shooting. BLM explained that Alternative C strikes a balance between long-term conservation and allowing uses that have traditionally taken place on IFNM, but ironically closes it to one of the most historic and popular public uses, recreational shooting.

In the DRMP, there is no middle ground for recreational shooting. IFNM is either opened



everywhere or closed everywhere to recreational shooting. BLM has made no attempt to accommodate recreational shooting within IFNM in any management alternative is deserving of serious consideration. The DRMP by the way it is structured is a pre-decisional document with respect to its treatment of recreational shooting. That decision was underscored by Field Manager Patrick Madigan in an opinion letter he wrote for the Arizona Daily Star that clearly was designed to manipulate public opinion to oppose recreational shooting in IFNM. He described the closure of IFNM as "an appropriate management choice."

The DRMP should be revised to include in a new preferred alternative identification of areas within IFNM where dispersed recreational shooting can take place. As we have from the beginning of the planning process for IFNM, the NRA would be pleased to assist BLM in identifying sites that would provide safe shooting venues and identifying ways in which safe and responsible recreational shooting can be fostered.

National monument designation did not prohibit recreational shooting in IFNM, yet BLM treats the designation as if it did. In fact, you have commented that one of the reasons BLM is considering a prohibition of target shooting within IFNM "is because of the greater level of protection that BLM must provide for a National Monument." The NRA is in agreement that public land resources need to be protected from destruction or degradation and irrespective of the designation that the public land carries. These resources must be protected in order that present and future generations have them to enjoy.

However, BLM uses the actions of irresponsible shooters as the reasons to close IFNM to all recreational shooters. But the real reason for the closure is that BLM is unwilling or incapable of providing the necessary management oversight so that shooting can take place in a safe and responsible manner. In justifying closure of IFNM, a BLM spokesperson said that the agency's desire is to promote a safe environment for all visitors. Recreational shooters would also like to have a safe environment as visitors to their public lands. However, no environment can be safe for any visitor unless BLM chooses to become pro-active in its management of the public's lands entrusted to it. BLM has simply chosen not to step up to the plate when it comes to managing recreational shooting. It is choosing to take the easy way out by letting the responsible recreational shooters suffer the consequences because of the irresponsible who are allowed to conduct their activities in an unsafe manner and who abuse the land and its resources because there is no authoritative presence and no management structure.

It appeared some years ago, that BLM struck off with the objective of improving recreational shooting on public lands and finding ways to resolve problems associated with it. Our understanding is that the process began four years ago when the BLM contracted the US Institute for Conflict Resolution to address recreational shooting in the Tucson Basin. Meetings were held, sportsmen were invited to participate, working groups were established, and a website was created. BLM acknowledged at these meetings that "shooting is a legitimate use of the public lands." It would appear that since that time and the release of the DRMP, a strong anti-gun, anti-shooting bias crept into the planning process and overshadowed early efforts to address recreational shooting as a "legitimate use of the public lands."

As you know, Arizona is largely a public lands state. There are very limited areas where



recreational shooting can take place other than on BLM lands. You have acknowledged how popular recreational shooting is by stating that "While the monument is located in a somewhat rural area, its proximity to Tucson and other growing communities makes it attractive to an increasing number of shooters, to the point where the resources may not be able to support the activity." So rather than finding ways to accommodate a historic use of these lands, a use that is growing in popularity with few places available on private land, BLM proposes to close IFNM. This approach simply exacerbates the problem of finding places to shoot and it will concentrate large numbers of shooters in smaller areas, increasing the problems that BLM has given as its reasons for closing 128,000 acres to recreational shooting.

Who should actually be blamed for "resource destruction caused by unregulated shooting" as Mr. Madigan characterized the situation. "Unregulated" shooting can also be called "unmanaged" shooting and this "unmanagement" is the fault of BLM. Responsible shooters, like any other recreational user of BLM lands, cannot be expected to take on the management responsibilities of the agency.

There are resources to support recreational shooting. It is a matter of whether BLM wishes to tap into those resources. One such resource is private sector partnerships. Nearly a decade ago, in the face of increasing loss of access and opportunity on public lands for target shooting, national hunting and wildlife conservation organizations formed a partnership with BLM and other federal land management agencies called the Public Lands Shooting Sports Roundtable. The objective of the Roundtable was to protect the future of the shooting sports on public lands by working together to resolve the kinds of issues that BLM cites as its reasons for closing IFNM to recreational shooting.

The NRA offered assistance to BLM representatives to the Roundtable and to IFNM but it was never accepted. Instead, BLM chose to engage in a public facilitated process to look at recreational shooting. However, as Patrick Madigan stated in his opinion letter, the process did not result in any clear decisions for IFNM, but did reveal that other public lands could be available as alternative sites for shooting. Mr. Madigan also stated that "I am convinced we can find a better location for shooting activity outside of the monument boundaries, one that will protect the public and the monument's important natural resources." You have also commented that there is BLM land outside of IFNM where recreational shooting would be allowed. To our knowledge, no such lands have not been identified.

There has been no study to determine if such lands would meet the needs of the recreational shooters who will be displaced from IFNM, as well as the needs of the public coming into the sport. If these areas are so well known, why were they not addressed in the DRMP? Even if these areas were made available, what guarantee is there that they will not fall victim to the same ills that have beset the shooting areas in IFNM and, at some point in the future, suffer the same fate? Problems do not go away and neither do irresponsible people by moving them from one location to another. It is time for BLM to actively manage recreational shooting and it can begin in IFNM.

As noted above, most people living in western states are dependent upon access to public land to enjoy the benefits of recreational shooting, to practice safety and marksmanship skills, and to introduce their family members to the shooting sports. It has been NRA's experience that when public land is closed to recreational shooting, no alternative sites are opened, meaning a net loss in recreational opportunities.

Hunters are also affected by the closure, even though the notice states that it does not apply to hunting. Hunting is more than the act of hunting game. Hunting is also about the preparations that lead up to opening season; that is, being a safe and humane hunter. Closing access to public lands for target shooting has an adverse effect on hunting in that the opportunity to hunt safely and enjoyably is restricted to the seasoned hunter, to those who belong to private gun clubs, and those who live elsewhere in the state or country. Hunters are not separate and distinct from target shooters. Hunters also need a place to practice, and to sight in their hunting guns.

As one final note, the Notice that appeared in the Federal Register stated that "Oral comments will be accepted and recorded at public meetings held during the 90-day review and comment period." It is our understanding, that BLM did not take oral comments from the public at its first five meetings, but instead broke the audience up into informal groups so that they could ask questions of individual BLM staff members. Those conversations were not recorded for the public comment record. Why did BLM not follow the procedure it stated in the Federal Register Notice? In the end, it resulted in a sixth meeting was allowed for oral comment on the record.

In summary, the NRA urges BLM to withdraw the DRMP in order to revise its preferred Alternative C to include the designation of areas within IFNM for dispersed recreational shooting. The NRA has the technical expertise to assist the BLM in resolving recreational use conflicts in a manner that promotes continued use of public lands for the traditional public land users, protects the natural and cultural resources of the land, accommodates other users of the public land, and protects private property.

Sincerely,

  
Susan Recce

Director

Conservation, Wildlife and Natural Resources  
National Rifle Association

## Comments on SDNM Draft Target Shooting Plan

February 14, 2017

Wayne Monger, Project Manager  
Lower Sonoran Field Office  
Bureau of Land Management  
21605 North 7<sup>th</sup> Avenue  
Phoenix, AZ 85027

Dear Mr. Monger:

The undersigned organizations appreciate the opportunity to submit comments on the Draft Target Shooting Plan for the Sonoran Desert National Monument (Draft Plan). We have a long-standing and vested interest in access and opportunities on the Sonoran Desert National Monument (SDNM) for recreational shooting as evidenced by comments that several of our organizations have submitted in the past on various phases of the Monument planning process related to the future of recreational shooting in the Monument.

We support Alternative C, the BLM's preferred alternative, but strongly recommend that it be modified as explained further below. The Draft Plan offers five alternative planning scenarios and our comments are in order of the alternatives presented.

Alternative A would continue the 1988 Lower Gila South Resource Management Plan without change. It is an attractive option for shooting enthusiasts because it would allow recreational shooting to take place throughout the SDNM. However, our organizations, along with many sportsmen and women who recreate on public lands within the SDNM, recognize that there are areas within the Monument that must be closed to shooting in order for BLM to fulfill the mandates of monument designation, to balance other recreational activities, and to ensure that shooting takes place in safe venues for shooters and other visitors of the SDNM. We, therefore, oppose Alternative A.

Alternative B reflects the court order closure of 10,599 acres as a temporary measure until the Draft Plan is completed. Although the closure was based on BLM's recommendation, we believe it was ill conceived in that the area is the most popular and accessible area of the SDNM for recreational shooting and it does not contain the important values for which the SDNM was designated. Further, it fails to recognize the importance and potential use of the Juan Bautista de Anza National Historical Trail (NHT). Thus, we oppose adoption of Alternative B.

Alternative C would allow recreational shooting in the Desert Back Country Recreation Management Zone (RMZ) only and partially lift the court ordered closure as addressed in Alternative B. The effect is that 54,817 acres or 11% of the SDNM would be closed to recreational shooting. Our issue with Alternative C is that it includes lands within the NHT Recreation Management Zone (NHT RMZ) that lie alongside the El Paso Natural Gas Company pipeline road and Highway 238. This is where much of the accessible, popular and historic shooting sites are located. We question even why these lands were included in the NHT RMZ, let alone in the SDNM boundary.

Their inclusion seems to be based on the fact that the pipeline road is an identifiable and likely more practical boundary than one drawn across mountainous features or flat land. Irrespective of the reason, in drawing the boundary of the NHT RMZ, the BLM essentially created an arbitrary northwesterly boundary. This finger of land encompasses an area most used and most suitable for recreational shooting. The entire “finger” is outside of the NHT view shed and its lower end is approximately eight air miles from the NHT. Its southeasterly end is nearly five miles from the most northerly boundary of the HNT corridor; eight miles from the trail. The most northwesterly boundary is 12 miles from the NHT. This portion of the SDNM, as well as most of its northeasterly boundary (largely defined by the Pipeline Road), is atypical of the cultural and natural values for which the SDNM was created. There is no identifiable rationale for this area to be closed to shooting. The Draft Plan does not explain what values for which the SDNM was designated that these lands along the pipeline road hold that demand closure to continued use by recreational shooters.

With respect to the NHT itself, on page 3-69, the Draft Plan states that *“Certain segments of the NHT that traverse the planning area are considered to be among the best preserved corridor segments and most representative of the historic trail corridor conditions.”* Yet in other places in the Draft Plan, it says that there are no known physical remains or surviving trail signature in the SDNM (page 3-7). Thus, it makes no sense to close the most northwesterly boundary of the NHT RMZ to recreational shooting. The only effect of closing the lands within the NHT RMZ is to close accessible and traditional sites that have been used for decades by recreational shooters. Keeping those lands open would not compromise protection of the NHT given the distance of the shooting sites from the most northerly boundary of the NHT RMZ.

As a final note, the map on page 3-12 shows that there is desert tortoise habitat within the boundary we have described as arbitrary. From what we can assess, it appears that the tortoise habitat acreage that may be involved in this desirable recreational shooting areas is a fraction of a percent of the Category I habitat, and represents an infinitesimal amount of the total tortoise habitat in the SDNM.

**Recommendation: That Alternative C be amended to open for recreational shooting that area described as the northwesterly finger of the NHT RMZ and that the amended Alternative C be adopted as the Target Shooting Plan for the SDNM.**

Alternative D would close designated wilderness lands, lands managed to protect wilderness characteristics, and the RMZ. The closure is sweeping in nature resulting in 320,317 acres or 66% of the SDNM that would be closed to recreational shooting. There is nothing in the Wilderness Act or in the BLM Manual 6340 – Management of BLM Wilderness that prohibits recreational shooting from taking place in designated wilderness and lands managed to protect wilderness characteristics. Because recreational shooting generally takes place in areas accessible by roads, it is unlikely that this activity will have a measureable impact. In fact, in the section titled “Environmental Consequences - Analytical Assumptions”, page 4-2, the Draft Plan references the furthest shooters will travel for their activity (one hour) and their dependency on vehicular access to shooting areas. This underscores the fact that the majority of recreational shooting is site dependent and is relatively uncommon in wilderness areas where it has minimal impact.

Absent significant, definable impacts and an inability to mitigate those impacts, there is no justification to support Alternative D. Our comments regarding the RMZ are noted above in Alternative C. Therefore, we strongly oppose Alternative D.

Alternative E would close the entire SDNM to recreational shooting. The BLM has used monument designation in other areas of the state to close lands designated as national monuments to recreational shooting where this activity has been a historic use of those lands. Rather than allowing recreational shooting to continue at a few sites that had been traditionally used by shooters that had good access and provided, or could have provided with improvements, safe shooting experiences, the BLM chose to close those monuments entirely, and nearly did the same with the SDNM. We were very pleased that the BLM took the public comments received on the SDNM draft resource management plan (RMP) to reevaluate its intent to close the SDNM to recreational shooting.

However, swinging the pendulum in the complete opposite direction by leaving the SDNM entirely open to recreational shooting was not supported by our organizations who are participants with the BLM in the Federal Lands Hunting, Fishing and Shooting Sports Roundtable (Roundtable). As noted in our comments regarding Alternative A, we fully understand the balance that has to be made in any planning area for the management of diverse recreational pursuits, visitor safety, and protection of resources and facilities. Alternative E would again reverse course and support the direction of the original RMP and is not supported by the facts and analyses in the Draft Plan. We strongly oppose Alternative E.

There are other aspects of the Draft Plan that we would like to briefly comment on.

Appendix B Monitoring and Mitigation attempts to develop an impact identification protocol to determine the acreage of permissible cumulative impacts. It is our understanding that this protocol had not been tested prior to the development of the Draft Plan and its release. Because this is a new concept in our planning lexicon it is difficult to determine how this information could be used or abused and whether these measures are designed to affect the closure of lands open to recreational shooting.

As you may be aware, non-governmental participants on the Roundtable have worked over the years with the BLM in promoting stewardship of our public lands. We implemented, in partnership with Tread Lightly! the Respected Access is Open Access outdoor ethic education campaign. We fully support the objectives of the Education and Outreach section of Appendix B that seeks to expand the Respected Access campaign, and we fully support its component parts. Many of our organizations have and continue to support volunteer clean up events that the BLM sponsors and we look forward to working with the BLM in a partnership to keep important sites for recreational shooting in the SDNM open and accessible, and that all recreationists respect their public lands by exercising good judgment, behavior and stewardship.

**Recommendation: That the Draft Plan include information about the Roundtable partnership and its efforts to assist BLM and its state partners and other stakeholders in keeping public lands open for traditional and long-standing recreational activities of hunting and shooting.**

The Draft Plan states on page 2-19 in discussing “Alternatives Considered but Eliminated from Further Study” that the BLM rejected the opportunity to designate target shooting areas “because designated recreational target shooting areas are inconsistent with the Monument proclamation and conflict with current BLM policy.” A thorough review of the proclamation does not reveal any statement that specifically precludes the BLM from designating shooting areas. Rather, it is the BLM’s unwritten policy executed in recent years agency-wide that prohibits designating shooting areas on any public lands, monument designated or not, even if such designation or identification would assist in promoting safe

and responsible shooting and reducing user conflicts. In fact, we believe it fair to say that not designating such areas actually exacerbates conflict with other uses and poses a barrier to constructive working relationships that could result in proactive and positive management of recreational shooting to everyone's benefit.

**Recommendation: That the BLM restate that the reason for not considering designating shooting areas as an alternative is because of BLM policy, not monument proclamation.**

In the section on "Hazardous Materials and Public Safety; Recreational Target Shooting" pages 3-73, the Draft Plan notes that alkaline soil conditions typical of the SDNM generally prevent any subsurface migration of metals. This is consistent with EPA's statements about lead migration in its document entitled *Best Management Practices for Lead at Outdoor Shooting Ranges* (EPA-902-B-01-001). Reference is made to sampling soils at 15 shooting sites in the SDNM and the fact that lead and arsenic were found exceeding threshold levels in some samples. Without knowing the location of the 15 sites and where the thresholds were exceeded, we have no ability to assess the information relative to the purpose of the draft environmental impact statement (DEIS). We also do not know if benchmark samples were taken of nearby similar soils undisturbed by bullets.

**Recommendation: That more explicit information is provided about the soil samples taken.**

In closing, the undersigned support the BLM's preferred alternative, Alternative C, ONLY if it is amended to exclude the northwesterly section of the NHT RMZ that contains accessible and popular shooting sites that have existed for years. We believe that retaining these sites not only allows continued use of an already impacted area, and maintains the all-important access necessary to make recreational enjoyment of safe shooting attainable in the SDNM, and it will not impact the NHT, or any of the other objects and values for which the SDNM was created.

Thank you for the opportunity to comment.

Arizona Chapter of the Public Lands Foundation

Boone and Crockett Club

Congressional Sportsmen's Foundation

Council to Advance Hunting and the Shooting Sports

Mule Deer Foundation

National Rifle Association

National Shooting Sports Foundation

Safari Club International

Wildlife Management Institute



## Comments on Draft RMP/EIS for Prehistoric Trackways National Monument

May 31, 2013

1. The RMP identifies shooting as a popular recreational activity in the Prehistoric Trackways National Monument (PTNM) and yet the preferred alternative closes the entire monument to recreational shooting.
2. The RMP is an “all-or-nothing” approach for recreational shooting. Under Alternatives A and B, there are “no restrictions on the discharge of firearms” and under Alternatives C and D “target shooting would be prohibited.” The RMP implies a pre-decision by the agency on the outcome of recreational shooting. Logically, recreational shooting would not be permitted throughout the monument, but the RMP provides no other option except closure. There is no middle ground where certain currently used sites by shooters would remain opened.
3. The BLM accommodates OHV users, particularly those engaged in extreme off-roading and rock crawling, with a special trail system. At the same time, the BLM abrogates any duty or responsibility to accommodate a traditional and equally popular recreational activity like recreational shooting.
4. The BLM has created a method to “scientifically” support closing the PTNM to shooting by applying industry tables on travel distance of bullets to create a ½ mile buffer around paleontological resources and OHV trails. The buffer application conveniently concludes that “there are no areas in the Monument that are more than ½-mile from areas of high public use where recreational shooting could take place safely.”

The RMP does not state that this standard of applying a buffer is supported by law or agency regulation or policy. It sets a dangerous precedent for future RMPs by implying that shooting is unsafe and inappropriate within ½ mile of OHV trails or paleontological resources, irrespective of unique or even common circumstances.

Implying that it is impossible to safely and responsibly shoot within ½ mile of existing trails would significantly impact shooting opportunities not only on the PTNM, but throughout federal lands managed by the BLM and other agencies. It is also unclear whether this standard is being applied because the PTNM is part of the National Landscape Conservation System or whether any site within the projected ammunition capabilities listed in Appendix G from a trail is candidate for closure.

5. The RMP did not consider designating some area(s) for shooting which could include a minimum amount of infrastructure to provide a safe shooting venue (backstops, target holders) that would also resolve the concern over user conflicts. The lack of proactive management for recreational shooting can be compared with the 32 miles of designated OHV trails in the PTNM.

The enacting statute for the PTNM states that the Secretary shall manage the monument in a manner that conserves protects and enhances the resources, including recreational resources, and values of the designated public land. By declaring in the RMP that “the area is known and used frequently for target shooting” and that the “Monument is often used by locals for recreational target practice”, the BLM acknowledges that shooting is an important recreational activity and that the recreational resources of the PTNM provide a value that should be conserved, protected and

enhanced. Conversely, the BLM's preferred alternative proposes to completely close the PTNM to this legitimate and traditional activity. This is at odds with Congress' declared intent to preserve and conserve recreational resources and values within the PTNM's identified boundaries. Further, enhancing recreational shooting by building backstops and installing target holders would be consistent with the legislative intent of the designating Act.

6. There is no consideration in the RMP for setting aside an area of current OHV use for recreational shooting. The RMP could suggest, as it did for recreational shooters, that there are over a million acres outside of the NM for OHV users who might be displaced because of accommodation to shooters. The point here is not to create an argument with OHV users, but rather to underscore how seemingly easy it is to write off one class of recreation use by suggesting that millions of acres remain open outside the planning area for that use.

Recreational shooting while recognized as a popular recreational activity in the NM is evidentially not recognized by the BLM as a legitimate and traditional activity in the planned area, and thus must yield to OHV users.

7. The Federal Lands Hunting, Fishing and Shooting Sports Roundtable Memorandum of Understanding (MOU) signed by the BLM, FWS, and USFS in 2006 pledges a partnership with hunting, wildlife conservation and shooting sports organizations to address issues and opportunities associated with hunting, fishing and recreational shooting on Federal Lands. The Roundtable, in partnership with Tread Lightly! Inc., launched an education outreach campaign "Respected Access is Open Access" to address issues of debris, vandalism, and other negative behaviors. While these issues are identified as a reason to close the NM to shooting, there is no indication that the BLM ever reached out to the local shooters and organizations or to its MOU partners to assist in resolving problems.
8. In most every instance, the BLM justifies closing areas by saying there are millions of surrounding public land that remains open to shooters. But, there is no discussion of whether this land has access, how far displaced shooters will have to travel, and whether the displaced shooters will create new impacts by concentrating use in these other areas. The reality is that concentrated recreational shooting, by definition, is site specific and cannot be picked up and placed just anywhere on the millions of acres that BLM manages.
9. The RMP includes several inflammatory statements about recreational shooting that could be interpreted as setting the stage for the BLM to slowly, but steadily close public lands, and not just monuments, to shooters. One notable example is the opening sentence in Appendix G which states that "Recreational target shooting contains many hazards based on predictable projectile physics and unpredictable human behavior." This speaks to an agency mindset about recreational shooting, irrespective of BLM statements to the contrary. Millions of acres of public land outside of national monuments may be open to shooting today, but it appears that it is only a matter of time before closures catch up to them.

The BLM through this RMP is holding recreational shooting to a different standard than other recreational activities in spite of the fact that shooting has one of the lowest accidental injury and death statistics of recreational activities. One can certainly claim that OHV use and mountain biking, for example, have "predictable projective physics and unpredictable human behavior" which can result in human injuries and death and destruction of resources. Yet, the BLM encourages and even sets aside areas for these uses, charging user fees in some cases.

10. The RMP justifies monument closure by stating that “Prohibiting target shooting would eliminate trash and litter left by target shooters, reduce the opportunity for user conflicts and increase visitor and BLM staff safety by reducing risks associated with stray bullets.” Further in the same paragraph, the RMP states that “Closing the Monument to target practice shooting would create a safer environment for researchers, visitors, and BLM staff and volunteers.”

The problems that the RMP identifies fall squarely at the feet of the BLM for not managing recreational shooting, as it does OHV use, camping, hiking and other pursuits, as a legitimate recreational activity in a national monument. The BLM can take these statements and overlay them on any public land and draw its conclusion that the lands should be closed. And, as noted in #7, the BLM evidences no effort to work with shooters and local, state, or national organizations to resolve issues.

11. In summary, the RMP for the PTNM is as alarming as have been the RMPs for Ironwood Forest NM and the Sonoran Desert NM where no effort on the part of the BLM was made to continue opportunities for an activity that has had a legitimate and historic use of the land. The opportunities for recreational shooting under these RMPs are illusory.
12. The undersigned organizations appreciate the opportunity to comment on the RMP and are open to continued discussion with the BLM, under the umbrella of our MOU, on how we as partners can work together to promote and enhance safe and responsible recreational shooting on our federal public lands.

Archery Trade Association  
Association of Fish and Wildlife Agencies  
Boone and Crockett Club  
Campfire Club of America  
Catch-A-Dream Foundation  
Congressional Sportsmen’s Foundation  
Dallas Safari Club  
Masters of Foxhounds Association  
Mule Deer Foundation  
National Rifle Association  
National Shooting Sports Foundation  
North American Bear Foundation  
Orion, The Hunter’s Institute  
Pope and Young Club  
Quality Deer Management Association  
Rocky Mountain Elk Foundation  
Ruffed Grouse Society  
Theodore Roosevelt Conservation Partnership  
Wildlife Forever  
Wildlife Management Institute