

Comments on NOI for Eastern Lake Mountains Area

July 22, 2015

BLM-SLFO
2370 South Decker Lake Boulevard
West Valley City, Utah 84110

Dear BLM:

The undersigned organizations have a long-standing and vested interest in access and opportunities on federal public lands for our members to enjoy hunting and recreational shooting. This vested interest led our organizations to sign a memorandum of understanding (MOU) in 2006 with the BLM. The Federal Lands Hunting, Fishing and Shooting Sports Roundtable MOU was renewed in 2014 between four federal agencies and 43 hunting, fishing, wildlife conservation and shooting sports organizations. The purpose of the MOU is to build a partnership “for planning and implementing mutually beneficial projects and activities related to hunting, fishing, and shooting sports conducted on federal lands.”

We appreciate the opportunity to comment during the scoping phase of the BLM’s plan to amend the Pony Express Resource Management Plan (RMP) and to prepare an environmental assessment for the Eastern Lake Mountains area. The focus of our comments is on the preliminary planning criteria specific to potential closure or restrictions of target shooting and the desired future conditions and uses of the 8,124 acres of the planning area.

The BLM has already closed 900 acres through a temporary closure order due to public safety concerns because the topography is flat with no natural backstops and there are a highway and homes in the vicinity. We understand that the closure will be included in the RMP amendment and that the BLM may propose to close additional areas where cultural resource damage has occurred. We understand the importance of protecting cultural resources from vandalism, but note that other acts of vandalism and theft do not result in the closure of public lands to other recreational activities. We encourage the BLM to base any additional shooting closures on sound justification, including determining whether such closures will protect the cultural resources from abuse by other public land visitors.

We have been advised by the Salt Lake Field Office of the proposed transfer of 160 acres of public land to Utah County under the Recreation and Public Purposes Act for the establishment of a shooting range, the proposed Soldier Pass Shooting Range. We strongly encourage the BLM to move as expeditiously as possible with the County on this initiative. If the transfer is not achieved, we recommend that the Field Office look to the RMP for Grand Junction, Colorado for an alternative approach. In that situation, the BLM office dedicated a Special Recreation Management Area to recreational shooting as a way to balance recreational needs of the public with the responsibility of providing for public safety and protection of cultural resources, two of the issues identified by BLM personnel as stated in the Notice of Intent.

We encourage the BLM to use the plan amendment as an opportunity to improve the quality of the recreational shooting experience by identifying areas particularly suitable for dispersed shooting. These areas should promote public safety, protect cultural resources, and reduce recreational use conflicts.

Our organizations have requested many times over the years that the BLM manage recreational shooting as it does other activities like camping and hiking. Such management will reduce recreational use conflicts and allow shooting to be conducted in safe and accessible environments where there are natural or manmade back stops. Further, we have also advocated for the construction of unsupervised “micro” ranges that would feature modest improvements like berms, target holders and shooting benches.

Much of the land in western states, including Utah, is managed in federal ownership, which means these lands play a key role in providing access and opportunity for people to participate in recreational shooting. Encroaching development and the increase in recreational participation are challenges that require a thoughtful, balanced and fair treatment of recreational shooting as a traditional and legitimate activity to be managed into the future. We have witnessed too often that closure to recreational shooting is the federal response when land managers are faced with the need to proactively manage for recreational shooting within the mix of other recreational activities.

We also encourage the BLM to include the “Respected Access is Open Access” outdoor ethics education campaign in the plan amendment. The Roundtable launched the campaign in 2009 with the full support of the BLM. The campaign assists land managers in addressing issues that can arise with recreational shooting, as well as with other recreational activities. The Roundtable has partnered with Tread Lightly! to manage this campaign. The Roundtable is trying to promote a consistent and visible message to shooters that promotes good stewardship of the lands and safe shooting. The BLM should include this important element in its management direction for recreational shooting.

We appreciate the opportunity to comment during the scoping phase and are open to any thoughts on how we and the community of shooters and hunters we represent can best help the BLM develop goals, objectives and desired conditions for recreational shooting. We would like to thank Rebecca Hotze, Field Office Manager, for the time she took to discuss and answer questions associated with recreational shooting in the Eastern Lake Mountains area.

Sincerely,

Boone and Crockett Club
Campfire Club of America
Congressional Sportsmen’s Foundation
North American Bear Foundation
National Rifle Association
National Shooting Sports Foundation
Safari Club International
Wildlife Management Institute