

## Comments on Permanent Closure of Hyalite Drainage to Target Shooting

September 9, 2016

Ms. Lisa Stoeffler  
Bozeman District Ranger  
Custer Gallatin National Forest  
P.O. Box 130  
Bozeman, MT 59771

Dear Ms. Stoeffler:

The undersigned organizations are signatories with the US Forest Service (USFS) to the Federal Lands Hunting, Fishing, and Shooting Sports Roundtable Memorandum of Understanding (MOU). We share a long-standing and vested interest in access and opportunities on federal public lands for people to enjoy hunting and recreational shooting. As such, we have concerns with the proposed permanent closure of the 34,000-acre area of the Custer Gallatin National Forest (CGNF) called the Hyalite drainage. We oppose the permanent closure as being premature in the face of potential future decisions for shooting opportunities in the Hyalite drainage.

Like the temporary closure implemented in April of this year, the USFS justifies making the closure permanent on the basis of increased recreational use in a narrow valley with a large number of developed and dispersed recreational sites, and a sizeable system of roads and trails. There was no explanation in April, nor one now in August, as to why one or more sites that had been used for target shooting within the 34,000 acres could not have remained opened. The rise in user conflicts does not provide a solid basis for a complete closure. Rather, the closure appears designed to simplify recreation management. No information was provided on the number of sites that were used by shooters in the Hyalite drainage, nor the number of people who engaged in recreational shooting there. To our knowledge, there has been no examination in the public light as to why none of the preexisting shooting sites could not have remained opened.

An article about the interim closure (provided at the end of this letter) quotes a CGNF spokesperson as saying that the CGNF would entertain a proposal to create a designated shooting area. We are not aware of any outreach by the CGNF to local shooting groups or to the MOU non-governmental signatories between April, when the temporary closure was implemented, and in August when CGNF announced its proposal to make the closure permanent.

In fact, the statements by the CGNF in the article appear contradictory. On one hand, CGNF is looking to create a designated shooting area, but then the spokesperson states that people can shoot elsewhere and that "it's really hard to pair target shooting with our high use numbers." Could it be that entertaining a proposal to create a designated shooting area was not a legitimate objective of the CGNF?

The press release on the proposed permanent closure states that:

*“A broader, county-wide planning effort for target shooting may occur in the future and is not part of this proposal. Alternatives that address target shooting opportunities and/or restrictions on other national forest lands are not being considered at this time.”*

If there is a county-wide effort on the horizon to address shooting issues holistically, why would CGNF move now to a permanent closure, rather than keeping the temporary closure in place until the county-wide process has been completed?

It is apparent that the CGNF has identified its de-facto preferred alternative prior to scoping, inasmuch as the press release states that “The Forest Service is now proposing to make this prohibition permanent and is seeking public comments.” It suggests that the CGNF is conducting a perfunctory public comment process, since it has announced its intent to impose a permanent closure without considering a full range of alternatives.

We oppose this action on the basis that it precedes a county-wide planning effort that can take into account the need for providing safe and accessible places for people to recreationally shoot. Further, this action ignores a stated intent of the CGNF to create a designate shooting area, which given the context in the article below, would suggest a site in the Hyalite drainage.

Sincerely,

Boone and Crockett Club  
Congressional Sportsmen’s Foundation  
Council for Advancement of Hunting and the Shooting Sports  
National Rifle Association  
National Shooting Sports Association  
Wildlife Management Institute

## Hyalite drainage to be closed to target shooting

An interim target shooting closure will go into effect on April 20 in the Hyalite drainage south of Bozeman.

The closure of about 34,000 acres of the Custer Gallatin National Forest is being enforced to reduce the chances of injury to the 40,000 summer visitors and 20,000 people who use the area in the winter. The drainage is the most heavily used forest area in Montana.

The closure would not apply to hunting and does not deny citizens the right to possess or carry firearms.

“We’ve had numerous close calls reported to us,” said Marna Daley, forest spokeswoman. “There’s lots of opportunity for folks to shoot elsewhere.”

In the past, some of the target shooters visiting Hyalite have used high-powered semi-automatic firearms to shoot down trees and left trash behind that's been hauled out by other user groups.

Sometime this summer the forest plans to launch an environmental review of its closure order to allow public comment. Daley said the forest would also entertain a proposal from a shooting group to create a designated shooting area.

The Forest Service had enacted a half-mile safety zone along both sides of the Hyalite Canyon Road in 2013 that was an initial attempt to address safety concerns.

"But with the increase in use, safety issues have continued to grow and grow," Daley said. "People need to feel safe while they are recreating on national forest lands. It's really hard to pair target shooting with our high use numbers."

The forest has other shooting closures but never of this size, including along the Boundary Trail north of West Yellowstone and on a small section of property across from Beatty Gulch, north of Gardiner.