

COMMENTS ON MANAGEMENT PLAN FOR PUBLIC LANDS IN SOUTHWEST COLORADO

September 29, 2016

Bureau of Land Management
Uncompahgre Field Office
2465 South Townsend Avenue
Montrose, CO 81401

Dear Bureau of Land Management (BLM):

The undersigned organizations are signatories, along with the BLM, 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. We appreciate the opportunity to comment on the draft resource management plan (DRMP) for 675,800 acres of public land in southwest Colorado.

Because the DRMP does not appear to affect hunting opportunities on or access to the planning area, our comments focus on the effects on recreational shooting of the DRMP's four management alternatives. Alternatives A and C would maintain closure to recreational shooting of 340 acres around developed recreation sites. We support the rationale for the continued closure of developed recreation sites to recreational shooting for the purposes in the DRMP of public safety and protection of facilities from potential damage.

Alternative B would close nearly 250,000 acres or 37% of the planning area to recreational shooting. We oppose this alternative as being excessive in meeting the BLM's multiple use mandates under the Federal Land Policy and Management Act. While this Alternative would close certain ACECs and SRMAs to recreational shooting, as does Alternative D (the BLM's preferred alternative), it would also close lands in Wilderness Study Areas and lands managed to protect wilderness characteristics. Since the Wilderness Act does not prohibit recreational shooting or hunting, there is no basis for the BLM to preemptively close lands to recreational shooting that are designated as wilderness or are protected for the future possibility of being designated as wilderness, any more than there is a basis to close these lands to hunting.

Recommendation: Remove any and all references to recreational shooting closure proposals that are inconsistent with existing BLM regulations (43 CFR Sec. 8365).

Alternative B would also close lands to recreational shooting where there are prairie dog colonies that have burrowing owls. No supporting data is provided to justify such closures as necessary for the protection of burrowing owls. Closing lands to public activities that have been a historic use requires supporting data to make the case for the loss of public access. That case is not made in the DRMP for Alternative B.

Recommendation: In areas where prairie dog colonies and burrowing owl populations are present as noted in Alternative B, provide analysis and or evidence of existing or predicted impacts to species populations as a result of the presence of recreational shooting prior to restricting the activity.

Alternative D proposes to close 49,370 acres to recreational shooting. It would maintain closure of lands around recreational facilities and, like Alternative B, it would close certain ACECs and SRMAs to recreational shooting. The DRMP explains that the ACEC and SRMA closures are designed to “increase the quality of other recreation opportunities”, or provide for “quiet trail or water-based activities,” or for those “users seeking opportunities for primitive and unconfined recreation.” We appreciate the need to provide well-balanced opportunities for a variety of recreation experiences; however, it is impossible to determine if the BLM will achieve the appropriate balance without data on the impacts, individual and cumulative, that these closures will have on shooters who are the only group of recreationists facing the entire loss of access under Alternative D and Alternative B that is currently open to them. All the DRMP states is that “prohibiting target shooting in certain areas would reduce opportunities for this activity.” To understand the true impact, one needs to know how many shooters will likely be affected, where the alternative locations to recreate are that have similar or better access, and what the effect will be on crowding and safety of driving displaced recreationists to areas used by other shooters.

For example, a person who recreationally shoots in the North Delta SRMA contacted a member of the Roundtable to say that the area would be well suited for target shooting and does not understand why it is proposed for closure. Under Alternative D on page 2-415 it is called the North Delta OHV area, implying that it will be closed to recreational shooting to accommodate off-highway vehicle (OHV) use. He explains that the area is remote and virtually unused except for target shooting and some OHV use. We share his concern because the DRMP does not lend understanding as to why both activities could not be accommodated if the recreational use is sparse and demand for places to shoot is expected to increase (as described below).

Recommendation: Under Alternative D on page 2-415, the BLM should provide further analysis and explanation regarding the inability of the North Delta OHV area to accommodate recreational shooting. Such analysis should provide the public with a description of how the area is currently used and an explanation as to the types of user conflicts that have been observed and what is predicted in the future. The analysis should also include the number and types of recreational users who would be impacted by the restrictions proposed in Alternative D.

The DRMP notes on page 3-178 that requests for dispersed shooting areas are expected to increase and with that, concerns from adjacent landowners are also expected to increase. However, nothing in the DRMP indicates how the BLM will address the expected increase in recreational shooting and resolve anticipated conflicts with landowners. Neither does the DRMP address how the ability of the BLM to respond to the expected shooting demand will be affected by closing additional public lands as proposed in Alternatives B and D.

On page 3-176, the DRMP states that there are no designated target shooting areas within the planning area, and that the “planning area has several unofficial shooting areas in old borrow pits, gravel pits and other disturbed areas where there is a history of such use.” These popular shooting sites are not identified in the DRMP as being within or outside the areas being proposed for closure in Alternatives B and D.

Recommendation: Identify existing “unofficial shooting areas in old borrow pits, gravel pits and other disturbed areas where there is a history of such use” in the DRMP and provide further explanation as to how these individual areas would be impacted by the various alternatives proposed in the DRMP.

On page 4-311, under Alternative C, the DRMP states that “Designated target shooting areas and ranges would be allowed, which could increase recreational opportunities by providing managed, accessible and designated areas for shooting.” A similar statement appears on page 4-316 under Alternative D. We question whether these are valid statements in light of BLM’s established policy of not allowing ranges to be built on public lands, including the addition of small improvements such as berms and target holders, as well as a separate policy that terminated the leasing of public lands for range development.

With rare exception, the BLM has steadfastly refused to identify or designate areas for recreational shooting, even if such designations would reduce user conflicts and increase public safety. The “disturbed areas” that the DRMP speaks of seem ideal sites to study for their potential to accommodate more concentrated recreational use as shooting participation increases, as well as their potential to mitigate the proposed closures, reduce user conflicts and positively respond to adjacent homeowner concerns. But we question whether this is a realistic expectation that the DRMP offers the public, when it appears to be diametrically opposed to agency policy.

Needless to say, we would very much support a reversal of these policies which would allow field offices such as the Uncompahgre to pursue these options in a quest to enhance recreational opportunities for all visitors, and to be proactive in addressing the projected increase of those who are looking to these public lands for recreational shooting opportunities. The DRMP would have provided the ideal opportunity to address proactive management of recreational shooting especially if, as noted, pressure for more places to shoot is likely to increase. At the very least, the closures proposed in both Alternatives B and D would exacerbate a set of condition that the BLM has described for the future, a future that the DRMP is supposed to address throughout the next 15 years. Therefore, we strongly encourage the BLM to incorporate the following recommendation.

Recommendation: Incorporate language in the final RMP that would allow the BLM to determine the feasibility of establishing “unofficial shooting areas” (noted above) as managed or unmanaged designated target shooting areas and/or ranges as an implementation level activity. In addition, retain language in the final RMP stating that “designated target shooting areas and ranges would be allowed, which could increase recreational opportunities by providing managed, accessible and designated areas for shooting.”

On page 5.2.7 of the DRMP, it states that

Staff from BLM UFO met with representatives of the local Rod and Gun Club and other interested firearm shooters on March 13 and April 10, 2013. The purpose of the meeting was to discuss potential management alternatives in the RMP, including areas with limits on or closure to target shooting. As a result of the meetings, the alternatives were further developed and refined. The attendees of the meetings indicated that they are generally agreeable with the actions that are carried forward in the preferred alternative.

Upon inquiring about those two meetings, we were provided with a list of the attendees. The only participants representing recreational shooting interests appeared to be representatives of the local rod and gun club; the other participants were largely representing OHV interests. For such important meetings, it is unfortunate that the private organizations that are signatory to the MOU were not contacted at the time and asked to assist in inviting recreational shooters to participate, especially those

shooters who are not affiliated with a gun club and may have no other place to shoot than in this planning area. It would appear that recreational shooting interests were very much underrepresented at the meetings. Further, we question whether those attending who represented recreational shooting interests agreed with BLM's preferred alternative, Alternative D. We were advised by one of the participants that support was not given for Alternative D, but that it was believed the alternative was a fait accompli.

In summary, we appreciate the fact that additional public lands beyond the closures to recreational shooting as embodied in Alternatives A and C may need to be made in order to provide for a variety of recreational experiences and for the protection of particularly sensitive natural and cultural resources. As noted above, we oppose Alternative B as being excessive in its closures to recreational shooting, as well as for other recreational users who also depend on motorized and mechanized access to these public lands. We also believe that Alternative D does not present a solid case for the closures of the areas identified that would result in nearly 50,000 acres being closed to recreational shooting, particularly in light of the fact that recreational shooting demand is expected to increase. And, importantly, the BLM's mitigation for the closures in light of increased demand is to designate shooting areas and allow ranges, both of which are against BLM's policies that exist today.

Thank you for the opportunity to comment on the DRMP.

Sincerely,

Boone and Crockett Club

Congressional Sportsmen's Foundation

National Rifle Association

National Shooting Sports Foundation

Safari Club International