

Comments on SDNM Draft Target Shooting Plan

February 14, 2017

Wayne Monger, Project Manager
Lower Sonoran Field Office
Bureau of Land Management
21605 North 7th 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