

## Wildlife and Hunting Heritage Conservation Council

November 6, 2012

The Honorable Ken Salazar, Secretary  
Department of the Interior  
1849 C Street NW  
Washington, D.C. 20240

Dear Secretary Salazar:

The release of the Sonoran Desert National Monument Record of Decision and Approved Resource Management Plan (RMP) provides the opportunity for the Wildlife and Hunting Heritage Conservation Council (Council) to formally express its appreciation to the Bureau of Land Management (BLM) for its decision to keep areas of the Monument open to recreational shooting.

We have read the list of Administrative Actions that the BLM is planning to undertake for recreational activities in the Monument, including recreational shooting. We are pleased that one of those actions is BLM's commitment to *collaborate with the Wildlife and Hunting Heritage Conservation Council, other interested stakeholders, and the public to implement management of recreational shooting in the future.* The Council looks forward to that future collaboration.

The hunting and shooting sports interests that we represent have expertise in this field, as well as ties to individuals, clubs and organizations that can assist the BLM in meeting its objectives of providing recreation use and access in a manner compatible with protecting the Monument's values and objectives. As stated in the Council's letter of May 14<sup>th</sup> and in the BLM's response of July 3<sup>rd</sup>, the Council will take an active role in engaging the shooting community to volunteer as site stewards for shooting areas.

Also under the Administrative Actions are listed seven restrictions or prohibitions associated with recreational shooting. The BLM states that these may be included in a future supplementary rule to promote safe and responsible shooting. Most of these appear to be reasonable and supportable requests of the public land users, and the Council would appreciate being consulted on the draft contents of the supplemental rule before it is released for public review and comment.

The Council is pleased that the Arizona Game and Fish Department (Department), in its June 28<sup>th</sup> letter addressed to you (attached), pledged continued and collaborative partnership with the BLM in the development of the supplemental rule, activity level planning, and implementation efforts for recreational shooting. The Department has a long history of working collaboratively with the BLM and the other Federal land management agencies in Arizona, and has experience and expertise in managing dispersed recreation as well as more concentrated recreational use. The Council looks forward to working with the Department through its fellow Council member, Jon Gassett of the Association of Fish and Wildlife Agencies.

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*U.S. Fish and Wildlife Service*  
*Farm Service Agency*  
*U.S. Forest Service*  
*Natural Resources Conservation Service*

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The BLM's letter of July 3<sup>rd</sup> also references the Council's commitment to work with Tread Lightly! in the promotion of outdoor ethics education. With that said, we note that one of the Administrative Actions is to *develop educational materials and signage to inform the public about how to conduct target shooting activities in ways that avoid impacts on natural resources and monument objects*. However, the Administrative Actions speak only to "Leave No Trace" principles, whereas the BLM's standard operating procedures for recreation call for encouraging "Tread Lightly" and "Leave No Trace" travel and camping techniques.

The Council encourages the BLM to include Tread Lightly! in its Administrative Actions plan. In concert with national hunting and shooting sports organizations, Tread Lightly! developed and launched the "Respected Access is Open Access" campaign through which brochures, PSAs and other materials have been developed to encourage safe and responsible shooting. The campaign was launched three years ago and has since been tailored to include other recreational activities such as camping and OHV use. Thus it would seem there would be no need to develop additional educational materials to meet the BLM's objective of *informing the public about how to conduct target shooting activities in ways that avoid impacts on natural resources and monument objects*. It would remain, then, for the BLM to post appropriate signage and widely distribute these educational materials.

In closing, the Council appreciates BLM's recognition via the RMP of the importance to our community of recreational shooting as a historic, legitimate and popular public activity on public lands, including national monuments. We support the general approach that the BLM has outlined in its Administrative Actions to balance the needs of the hunter and shooter with places to shoot on public lands and the safety of visitors and protection of public land values.

Sincerely,

A handwritten signature in black ink that reads "John Tomke". The signature is written in a cursive, flowing style.

John Tomke, Chair  
Wildlife and Hunting Heritage Conservation Council

Cc:  
Mike Pool, Director (acting) Bureau of Land Management

Attachment



COPY

THE STATE OF ARIZONA  
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June 28, 2012

Mr. Mike Pool  
Acting Director  
Bureau of Land Management  
1849 C Street, NW  
Washington D.C. 20240

RE: Recreational Shooting - Lower Sonoran and Sonoran Desert National Monument Proposed Resource Management Plan and Final Environmental Impact Statement

Dear Director Pool:

The Arizona Game and Fish Department (Department) fully supports the Bureau of Land Management's (BLM) proposed alternative (Alternative E) regarding 'Recreational Target Shooting Areas' in the Lower Sonoran and Sonoran Desert National Monument (SDNM) Proposed Resource Management Plan (RMP) and Final Environmental Impact Statement (EIS). The Federal Land Policy and Management Act of 1976 (FLPMA) establishes a multiple-use mission for public lands under the jurisdiction of Bureau of Land Management. Recreational target shooting is a traditional recreational use of BLM lands, and we are encouraged that the Bureau has endorsed its multiple-use mission by embracing dispersed recreational shooting in its RMP.

Recreational shooting is recognized as a legitimate and important recreational resource valued by the public. Dispersed recreational shooting on BLM public lands provides an important opportunity (especially for urban youth) to get outdoors and develop a personal connection with nature. Dispersed recreational shooting continues to provide a safe and informal gateway to formal shooting sports and hunting. The Department recognizes hunters as not only supporters of the multiple-use mission, but supporters and principal funders of wildlife conservation. Further, the importance of hunting and recreational shooting as a gateway to hunting is recognized in the 2006 Executive Order 13443 (EO), "Facilitation of Hunting Heritage and Wildlife Conservation." This EO called for the development of a "Recreational Hunting and Wildlife Resource Conservation Plan" and a 10-year implementation plan. One of the resulting implementation plan recommendations is to: "Increase structured hunting programs and recreational shooting opportunities as a means of achieving a net increase in federal land hunting."

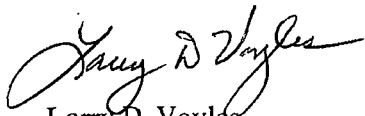
The Department understands and respects BLM's mandate to avoid and minimize impacts to Monument objects and protect the public's safety. We recognize the need to proactively manage recreational activities, including dispersed recreational shooting, on SDNM. For these reasons,

Director Abbey  
Recreational Shooting Support – SDNM/LS RMP

the Department wishes to continue our collaborative partnership with BLM in the development of the supplemental rule, activity level planning and implementation efforts for recreational shooting described in the Resource Management Plan.

Once again, the Department fully supports the BLM's decision to continue to allow responsible, dispersed recreational shooting on the Lower Sonoran and SDNM. We look forward to working with the BLM to encourage shooters to practice the best management practices outlined in Appendix H in the RMP for safe dispersed recreational shooting.

Sincerely,

A handwritten signature in cursive script that reads "Larry D. Voyles".

Larry D. Voyles  
Director

Cc: Ray Suazo, Arizona State Director BLM