



September 23, 2022

*Submitted via email:* [BLM\\_AZ\\_SDNMtargetshooting@blm.gov](mailto:BLM_AZ_SDNMtargetshooting@blm.gov)

Katie White Bull  
Acting Field Manager  
Bureau of Land Management, Sonoran Desert National Monument  
Attn.: RMPA EA  
2020 E. Bell Road  
Phoenix AZ 85022

**RE: Notice of Intent to Amend the Resource Management Plan for the Sonoran Desert National Monument, Arizona**

Arizona Sportsmen for Wildlife Conservation (AZSFWC) appreciates the opportunity to comment on the Bureau of Land Management's (BLM) Notice of Intent to amend the Resource Management Plan (RMP) for the Sonoran Desert National Monument (Monument) and prepare an associated Environmental Assessment (EA).

AZSFWC is a 501c-3 organization dedicated to wildlife conservation, habitat improvement, youth recruitment and retention, as well as educating outdoor enthusiasts on issues important to their passions. AZSFWC member organizations reach across the spectrum of wildlife conservation, hunting, angling, shooting sports, outdoor recreation groups and businesses from across Arizona, representing more than 25,000 people. Many of our members regularly visit the Monument in order to target shoot, hunt, and enjoy other outdoor recreation activities.

We understand that the amended RMP and EA are being prepared in response to an April 2022 settlement agreement to resolve litigation over the 2018 Record of Decision and Approved Resource Management Plan Amendment for the Monument. AZSFWC believes recreational shooting is a traditional and appropriate activity on federal public lands in Arizona and one that plays an important economic and social role. We have outlined that position in previous comments to the BLM concerning recreational shooting on the Monument (attached).

AZSFWC agrees that this activity must be managed in a way that protects public safety and resources at risk. That said, in preparing this RMP amendment and EA, the BLM must adhere to requirements in Section 4103 of the 2019 John D. Dingell Jr. Conservation, Management, and Recreation Act (Dingell Act). We appreciate that the public notification element of the Dingell Act has been addressed through the Federal Register Announcement on August 24, 2022. However, we noted that other elements of the Act, which pertain directly to this planning process were omitted. These include provisions requiring that:

AZSFWC comments to BLM on RMP for Sonoran Desert NM – 9-23-22

Arizona Sportsmen for Wildlife Conservation  
PO Box 75731 New River, AZ 85087

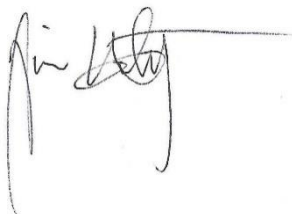
- BLM "*facilitate the expansion and enhancement of hunting, fishing, and recreational shooting opportunities on Federal land.*" 16 U.S.C. § 7901(a)(1).
- BLM must consult with the state wildlife agency prior to permanently or temporarily closing any Federal land to hunting, fishing, or recreational shooting. 16 U.S.C. § 7913(b)(1)(A).
- BLM may only close areas to hunting, fishing and recreational shooting (beyond lands already closed or authorized for closure in the No Action Alternative) for reasons of public safety, administration, or compliance with applicable laws. 16 U.S.C. § 7913(a)(1).
- If BLM closes areas to recreational target shooting (beyond lands already closed or authorized for closure in the No Action Alternative), BLM must "*designate the smallest area for the least amount of time that is required for public safety, administration, or compliance with applicable laws.*" 16 U.S.C. § 7913(a)(2).

These omissions are arguably inconsistent with the NEPA process and represent a lack of transparency to the public. AZSFWC therefore requests that BLM issue a revised public notice that includes these planning sideboards, with an appropriate extension of the comment period.

As this planning process moves forward, it is important that language in the RMP and EA make a clear distinction between legal, safe target shooting versus illegal or irresponsible actions that compromise public safety and resource values. These two behaviors should not be conflated. Finally, we ask that the Arizona Game and Fish Department continue to serve as a Cooperating Agency for this RMP and EA, as they bring to bear a breadth of on-the-ground knowledge to support the planning process.

AZSFWC and 22 of our member organizations (list attached) appreciate your consideration of our input and comments.

Thank you!



Jim Unmacht  
Executive Director

CC: Ray Suazo, State Director  
Jerry Davis, Deputy State Director, Resources and Planning  
Ty Gray, Director, Arizona Game and Fish Department



**AZSFWC Member Organizations Supporting Comments  
to Amend the RMP for the Sonoran Desert National Monument**

Anglers United  
AZ Antelope Foundation  
AZ Bass Nation  
AZ Big Game Super Raffle  
AZ Chapter of National Wildlife Turkey Federation  
AZ Deer Association  
AZ Desert Bighorn Sheep Society  
AZ Elk Society  
AZ Houndsmen's Association  
AZ Outdoor Sports  
AZ Predator Callers  
Ben Avery Clay Busters  
Christian Hunters of America  
Diablo Trust  
Outdoor Experience 4 All  
Southern AZ Quail Forever  
Southwest Wildlife Foundation  
SRT Outdoors  
The Bass Federation  
Theodore Roosevelt Conservation Partnership  
Valley of the Sun Quail Forever  
Yuma Valley Rod & Gun Club