NEVADA FIREARMS COALITION

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BLM Nevada State Office
Draft RMP/Draft EIS
1340 Financial Boulevard
Reno, NV 89502

BLM Carson City District Office
Draft RMP/Draft EIS
5665 Morgan Mill Road
Carson City, NV 89701

RE: Public comments: Carson City Draft Resource Management Plan (RMP) and Environmental Impact Statement

The Draft Resource Management Plan (the "Plan") barely mentions recreational shooting areas in its discussion of regulating activities on the approximately 9,000,000 acres (over 14,000 square miles) that will be affected by the Plan. The only indication that the BLM is aware of recreational shooting appears in Table 4-20 on page 4-486, which states: "Shooting restrictions will restrict only target/projectile shooting within the urban interface or where public safety concerns exist. Shooting restrictions will not affect the lawful taking of game." When discussing the effects of Alternatives D and E for Extensive Recreational Management Areas, there are also a few references to restriction of target shooting in times of high fire danger. The Plan, however, neither mentions recreational shooting areas in any of its alternatives nor suggests where they might be located even though it indicates in Alternative E that commercial target shooting will be prohibited in some areas.

The planning area encompasses a huge amount of land. It is larger than Massachusetts, Rhode Island, and Delaware combined, nearly as large as Connecticut and New Jersey together, and 50% larger than Vermont or New Hampshire. It contains vast stretches of remote land, which are neither populated nor near heavily populated areas, that are suitable for both short-range and long-range target shooting. Yet the Plan does not seriously consider any areas for recreational target shooting. Nevertheless, the Plan proposes a host of other outdoor activities for those 9,000,000 acres, namely camping, OHV touring, horseback riding, mountain biking, boating, swimming, picnicking, backpacking, nature observation, water skiing, bird watching, fishing, dog walking, hiking, and photography among others. The fact that other recreational users may wander into designated areas where people are shooting firearms is no reason to not provide for them. Such areas can be prominently posted to warn the public of their use just as wilderness areas are posted.
The Plan does not even define what it considers a recreational shooting area. More important, it offers no analysis of the *amount* of recreational shooting that occurs on public lands or *where* it occurs, an analysis that should be central to any discussion about closures. The only management option expressed is closure,

no other management strategies are presented, and there is no section of the plan which addresses recreational shooting.

The BLM has not sought input from the public regarding potential closures of public land that recreational shooters have used for decades. Indeed, the textual body of the Plan does not set forth factual justifications or specific details that support closing any recreational target shooting area or prohibiting such shooting in areas where it may not have heretofore existed. If the BLM is basing the proposed closures on potential/alleged environmental damage or safety issues, those matters should be addressed and documented with facts.

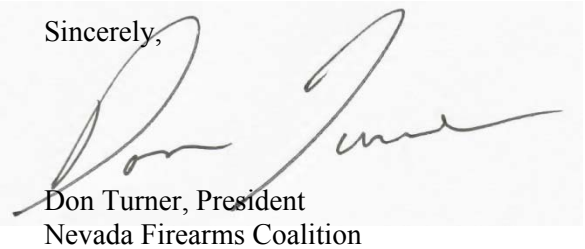
Outdoor shooting on public lands has always been a traditional western activity. It usually involves only an individual or small groups of shooters who are not acting under the auspices of any organization. Although multiple use is a required planning function, recreational shooting invariably has been omitted from land management plans. The present Plan is no different. A revised Plan should include the location and proposed development of recreational shooting sites, *i.e.*, informal designated locations near areas with high shooter activity, after soliciting comments from the public for their designation. Public lands exist for public use, and should accommodate recreational shooters that are a growing part of the recreational public. We are aware that there are some who shoot items that are not paper targets and do not clean up their trash. However, banning recreational shooting on land that the BLM controls is not a responsible solution.

Instead, the Plan should seek the budgeting of funds to establish, regulate, and police designated outdoor areas set aside for recreational shooting in the same manner as areas designated for off-road vehicles, watercraft, etc. even if the areas are not supervised by full-time employees. They should be established with buffers of additional public land around them to prevent encroachment. Recreational shooting is not a sport engaged in by only a small minority of the public. Closing large areas to recreational shooting and not planning for recreational shooting is a draconian action that will punish the larger segment of responsible shooters.

In Summary the Nevada Firearms Coalition finds fault with the proposed document and recommends that the Plan be revised to incorporate the management of recreational shooting on public lands as a significant management responsibility. The BLM is a signatory partner in the Federal Lands Hunting, Fishing, and Shooting Sports Roundtable and has promised to increase the management planning of recreational shooting on its managed lands, yet this document does not reflect that agreement which states in part: "*b. The primary mission of the FS and BLM is multiple-use management of the federal lands they administer. Under the multiple-use mandates of the FS and BLM, hunting, fishing, and shooting sports activities (defined for purposes of this MOU to include activities conducted at target ranges and appropriate dispersed shooting sites) are legitimate uses of those lands, except where specifically prohibited for safety or other reasons."* The omission of recreational shooting from the RMP needs immediate correction.

Thank you for this opportunity to comment,

Sincerely,



Don Turner, President
Nevada Firearms Coalition

cc: Susan Recce, NRA-ILA