



NEVADA FIREARMS COALITION

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BLM Southern Nevada District Office
Las Vegas/Pahrump Field Offices
Draft RMP/Draft EIS
4701 N. Torrey Pines Drive
Las Vegas, NV 89130

RE: Public comments: Revision of the 1988 Las Vegas Resource Management Plan (RMP)
Clark and Nye County Draft Resource Management Plan and Environmental Impact Statement

In 1988, the demand for recreational shooting on BLM lands was not as significant as it is now due to the tremendous increase in southern Nevada population in Clark and Nye County. The National Shooting Sports Foundation estimates that over 49% of the residents of Clark County own firearms.

Since 1988, large areas of BLM land have been closed to recreational shooting. In addition, a \$65 million dollar recreational shooting complex was built on 2,500 acres of transferred BLM lands while using Southern Nevada Public Lands Management Act funding. Despite this significant increase in use and demand for public lands for recreational shooting, the only indication that the BLM is even aware of recreational shooting appears in the Appendix Q Maps for the Las Vegas and Pahrump Field Offices RMP. Maps 30, 31, and 32 which addresses three alternatives for "Recreational Target Shooting Closures." 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.

Clark County encompasses a huge area. It is eight times the size of Rhode Island, more than three times the size of Delaware, one-third larger than Connecticut, and nearly as large as New Jersey, Vermont, and 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 they are apparently being designated for closure despite shooters posing no documented, serious risk in those areas to the general population. The fact that other recreational users may wander into those areas when people are shooting firearms is no reason to close them. The areas can be prominently posted to warn the public

of their use just as wilderness areas are posted. Clark County residents mainly inhabit the Las Vegas Valley where recreational shooting rarely occurs on public land except in established, pay-for-use ranges such as the Clark County Shooting Complex. The current proposed closures will make it onerous for urban residents to find a place to shoot without paying a fee to a private or public range. In addition, no other alternatives except closures are presented.

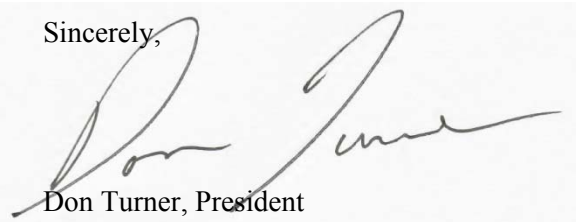
Outdoor shooting on public lands has always been a traditional western activity. It usually involves only an individual or small groups of shooters who are not acting under the auspices of any organization. Although multiple use is a required planning function, recreational shooting invariably has been 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. Clark County residents should not have to drive to a very distant area, including another county, to practice their sport. 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,

A handwritten signature in black ink, appearing to read "Don Turner", is written over a light gray rectangular background.

Don Turner, President
Nevada Firearms Coalition

cc: Susan Recce, NRA-ILA