

Comments on Eastern Colorado Preliminary Alternatives Report

May 1, 2017

Mr. John Smeins
Bureau of Land Management
Royal Gorge Field Office
3028 E. Main Street
Canon City, CO 81212

Dear Mr. Smeins:

The undersigned organizations appreciate the opportunity to comment on the Preliminary Alternatives Report/Draft Basis for Analysis (the documents) which will lead to the development of a resource management plan (RMP) that will guide the future management of more than 658,000 acres of surface land in eastern Colorado within the BLM's Royal Gorge Field Office. Although we are not supporting a specific Alternative, our comments address the documents as a whole relative to the effects that future management decisions will have on recreational shooting in the planning area.

Our organizations have a long-standing history of involvement in BLM's development of land management plans because of the effects of the Agency's decisions on sportsmen and women who depend upon these public lands for their recreational pursuits. We are signatories to the Federal Lands Hunting, Fishing and Shooting Sports Roundtable Memorandum of Understanding (MOU) with the BLM, Fish and Wildlife Service, Forest Service and the Army Corps of Engineers. The purpose of the MOU is to:

Develop and expand a framework of cooperation among the Parties at the national, regional, and local levels for planning and implementing mutually beneficial projects and activities related to hunting, fishing and shooting sports conducted on federal lands. These activities and projects will complement the respective missions of the Parties and serve the mutual interests of the Parties and the public.

We fully support the Resource Specific Management Actions Statement for Alternatives B, C, and D which states that the BLM will *work to provide access to public land for hunting, fishing, and other dispersed recreation activities in balance with other resource considerations*. We note, in particular, that an objective for Dinosaur Flats Resource Management Zone (RMZ) is to provide opportunities for recreational shooting because of the proximity of Dinosaur Flats to the community of Canon City where most people who enjoy this recreational pursuit are likely to live and the demand would be the highest. Visitors in the population center would want good access to their public lands.

We believe that the recreational shooting management strategies employed by the BLM Grand Junction Field Office and included in the Grand Junction RMP, which was approved in August 2015, can provide insight into the development and implementation of alternatives for the Eastern Colorado RMP that appropriately manage recreational shooting in a balanced manner. Specifically, the approved Grand Junction RMP:

- Used the Extensive Recreation Management Area (ERMA) designation to provide visitors with opportunities to participate in recreational shooting at developed shooting ranges in close proximity to populated areas where demand for shooting opportunity is the highest.
- Used the ERMA designation to manage recreation in this area to ensure a balance between protecting targeted recreation activities and settings with other resource uses.
- Physically delineated the boundaries of the ERMA using signage, fencing and other appropriate markers/barriers.
- Increased safety by designating recreational shooting-focused ERMAs as Right-of-Way avoidance areas.
- Developed a framework for BLM to work with stakeholders to maintain adequate access to shooting range facilities, consistent with ERMA objectives.
- Balances activities such as mountain biking, hiking, trail running, motorcycle riding, ATV riding and 4x4 vehicle driving and recreational shooting by utilizing Recreation Management Zones (RMZs) that call for targeted management of geographically defined areas within an ERMA.

Based on the preliminary alternatives presented in the Eastern Colorado document, particularly the inclusion of the proposed Dinosaur Flats Dispersed Area RMZ, it appears that the BLM is considering using similar strategies as the Grand Junction RMP. Where feasible, we support these proactive management approaches in areas that feature a high demand for diverse types of recreational opportunity, including recreational shooting, that otherwise may result in an increased likelihood of user conflicts or the need for intervention to address resource impacts.

On page 340 in the chart related to the Garden Park Area of Critical Environmental Concern (ACEC), Alternative B would close the ACEC to recreational shooting once an area suitable for shooting has been determined. No similar action is recommended in the other alternatives. It appears that the source of this proposed action in Alternative B are comments outlined on page 609 of the Scoping Summary Report for the RMP:

It is also our understanding that there is an existing target shooting area in this area that has grown in popularity significantly in recent years. It is highly questionable whether the Dinosaur Flats shooting area supports the goals and objectives for the Garden Fossil Park National Natural Landmark and the Garden Park ACEC. The noise from this high density target shooting, particularly in the fall months, is just one of many impacts that significantly degrade the visitor experience in a nationally-recognized paleontological site. Evidently, The Gold Belt TMP asserts that target shooting in the Dinosaur Flats portion of the Garden Park sub-unit would be phased out upon identification of a suitable replacement. BLM Royal Gorge Gold Belt TMP EA at 10. BLM should conduct a safety and management compatibility review for the Dinosaur Flats shooting area prior to releasing its preliminary draft alternatives report.

With the Garden Park ACEC and the proposed Dinosaur Flats RMZ in close proximity to one another, it is unclear how the proposed Alternative B action would affect the RMZ proposal given that the Resource Specific Management Actions Statement for Alternatives B, C, and D is to provide opportunities for recreational shooting. However, if the RMZ is not affected, but the action intends to close the ACEC to

recreational shooting “upon identification of a suitable replacement”, then it needs to be made clear that any replacement site must be operational, and not just identified, prior to restricting shooting in or around the ACEC, particularly the popular Red Canyon and Dinosaur Flats areas to the west of the Garden Park Road. If the recreational shooting opportunities facilitated by the establishment of the RMZ are intended to offset lost opportunity associated with closure of the ACEC, the BLM should provide an analysis that compares and contrasts the management of recreational shooting as a primary activity in the RMZ with the target shooting experience that would be lost as a result of closing the ACEC.

In closing, we appreciate having the opportunity to comment on the documents in this early stage of developing a RMP.

Sincerely,

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