

**United States Department of the Interior  
Bureau of Land Management**

**SCOPING REPORT  
for the  
Sonoran Desert National Monument  
Resource Management Plan Amendment  
and  
Environmental Impact Statement**



**April 20, 2016**

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## **Introduction**

President William J. Clinton issued Presidential Proclamation 7397 on January 17, 2001 (*Refer to Appendix A, Sonoran Desert National Monument Presidential Proclamation*) creating the Sonoran Desert National Monument (SDNM). The Monument was created to protect an array of scientific, biological, archaeological, geological, cultural, and historical objects. These objects, both individually and collectively in the context of the natural environments that support and protect them, are referred to as “Monument objects.” Located within the Bureau of Land Management’s (BLM) Lower Sonoran Field Office (LSFO), the BLM is responsible for the management of public lands within the SDNM in a manner that is consistent with management guidance outlined in the proclamation. The LSFO completed a Resource Management Plan (RMP) and Record of Decision (ROD) for the SDNM in 2012 to direct management of the area in accordance with the proclamation.

This Plan Amendment is being prepared to address recreational target shooting within the boundaries of the SDNM. The decisions related to management of recreational target shooting in the SDNM RMP/Final Environmental Impact Statement and ROD were deemed inadequate, vacated, and remanded back to BLM for reconsideration by a March 27, 2015, U.S. District Court-District of Arizona ruling. Through this Plan Amendment and EIS, the BLM will address areas available for recreational target shooting, if any, and associated management prescriptions, public safety concerns, cultural and natural resource protection, and damage to Monument Objects. This Plan Amendment is also necessary due to changing circumstances involving increasing physical damage to the Monument Objects, including significant amounts of associated “trigger trash”, which are shell casings and materials used as targets and left behind, as well as hazardous waste left on public lands as a result of target shooting. This amendment will focus only on reconsideration of recreation management decisions for recreational target shooting and the resources and uses affected by such in the Sonoran Desert National Monument ROD.

## **Purpose and Need**

The Federal Land Policy and Management Act (FLPMA) directs the BLM to manage the public lands and their various resource values for multiple use and sustained yield to ensure they are utilized in a manner that will best meet the present and future needs of the American people. As required by FLPMA and current BLM policy, the BLM prepared the SDNM RMP to establish management directions for the balanced use of such renewable and non-renewable resources as rangeland, wildlife, wilderness, recreation, cultural resources, and other natural, scenic, scientific, and historical values within the Monument planning area.

The purpose of this Plan Amendment is to develop a range of reasonable alternatives for recreational target shooting and to re-analyze and disclose the environmental consequences on the Monument, while addressing necessary actions to protect the objects identified in the Proclamation.

The need for this planning effort is to cure deficiencies identified by the District Court. The Court found that BLM violated FLPMA and the Proclamation by failing to protect Monument objects, and violated NEPA by containing an inadequate analysis of mitigation measures and an inadequate analysis of the cumulative effects of recreational target shooting in conjunction with other activities and Monument objects.

## **Planning Area**

The Planning Area, identified on Map 1, covers nearly 496,400 acres of south-central Arizona and includes approximately 440,622 acres of Maricopa County, as well as approximately 55,733 acres of Pima County. Population centers adjacent to the Planning Area include metropolitan Phoenix and the communities of Ajo, Goodyear, Buckeye, Gila Bend, Mobile, and Maricopa. The Planning Area encompasses federal- and state-administered lands as well as private lands, the BLM manages 486,400 surface acres of public lands within the Planning Area, as well as 461,000 acres of (sub surface) mineral estate. The State of Arizona manages 3,900 acres in the Planning Area, with the remaining 6,100 acres being privately-owned land. In accordance with Presidential Proclamation 7397, the Sonoran Desert National Monument was designed to protect “a magnificent array of untrammelled Sonoran Desert landscape” with an “extraordinary array of biological, scientific, and historic resources” (Appendix A).

The entire Monument features 496,337 acres of Sonoran Desert landscape identified as the most biologically diverse of the North American deserts. The most striking aspect of the plant community within the monument is the extensive saguaro cactus forest. The monument contains three distinct mountain ranges, the Maricopa, Sand Tank and Table Top Mountains, as well as the Booth and White Hills, all separated by wide valleys. The monument is also home to three congressionally designated wilderness areas: the North Maricopa Mountains Wilderness, the South Maricopa Mountains Wilderness, and the Table Top Wilderness, many significant archaeological and historic sites, and remnants of several important historic trails. The North Maricopa Mountains Wilderness has two hiking and equestrian trails, the 9-mile Margie’s Cove Trail and the 6-mile Brittlebush Trail. The Table Top Wilderness also has two hiking and equestrian trails, the 7-mile Lava Flow Trail and the 3-mile Table Top Trail. A section of the Juan Bautista de Anza National Historic Trail crosses the national monument. This congressionally designated trail parallels the Butterfield Overland Stage Route, the Mormon Battalion Trail, and the Gila Trail.

Vegetation in the Monument is unique, with the saguaro cactus being a signature plant of the Sonoran Desert. Individual saguaro plants are magnificent, but a forest of these plants, together with the wide variety of trees, shrubs and herbaceous plants that make up the forest community in the Monument, is an impressive site. The saguaro cactus forests within the monument are a national treasure, rivaling even those within the Saguaro National Park.

The rich diversity, density, and distribution of plants in the Sand Tank Mountains area of the monument is especially striking and can be attributed to the management regime in place since the area was withdrawn for military purposes in 1941. To extend the extraordinary diversity and overall ecological health of the Sand Tanks Mountains area, land adjacent and with biological

resources similar to the area withdrawn for military purposes should be subject to a similar management regime to the fullest extent possible.

Scientific analysis shows that the area received far more precipitation 20,000 years ago, and slowly became more arid. Vegetation for the area changed from juniper-oak-pinion pine woodland to the vegetation found today in the Sonoran Desert, although a few plants from the more mesic period, including the Kofa Mountain barberry, Arizona rosewood, and junipers, remain on higher elevations and north-facing slopes.

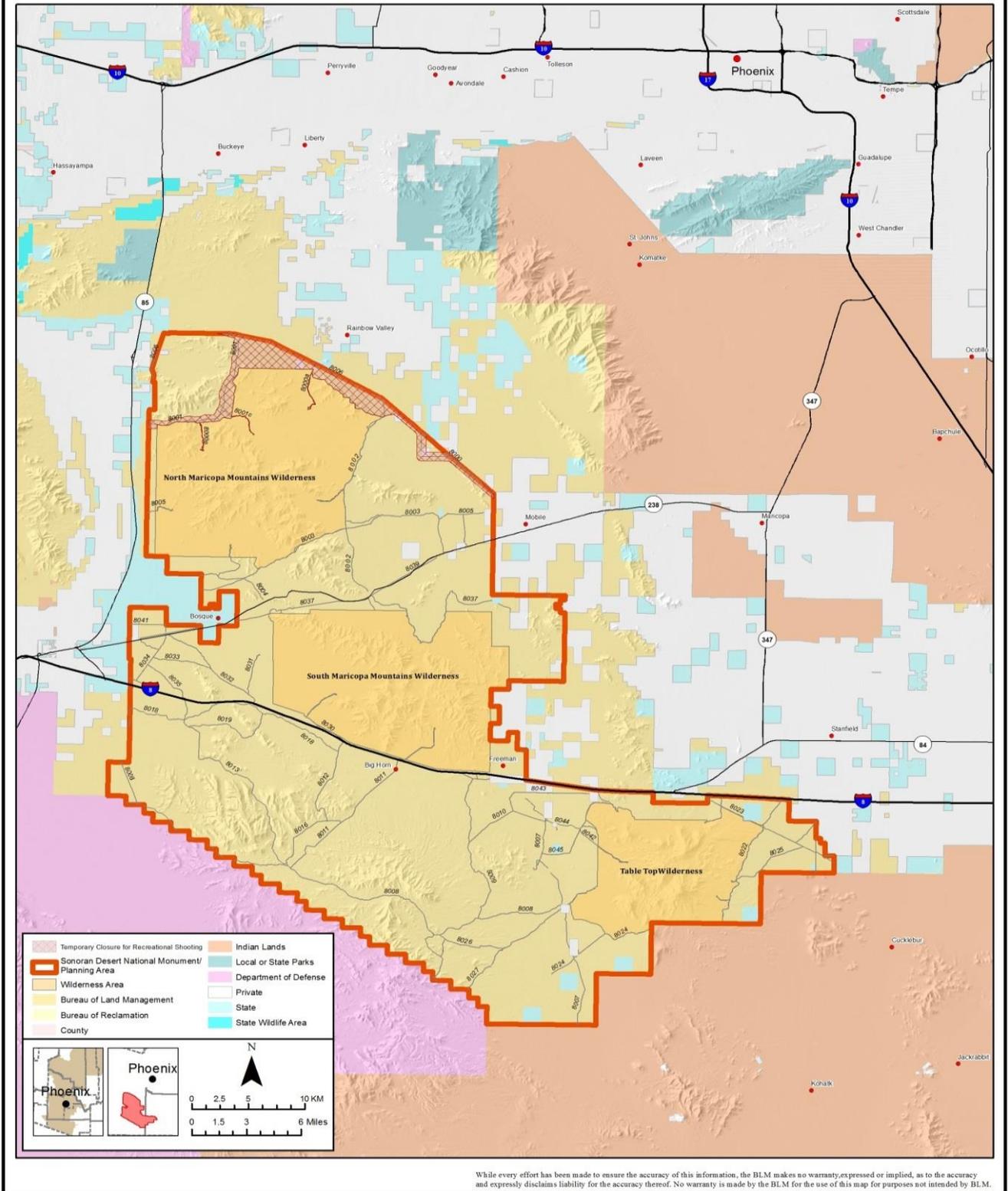
The lower, flatter areas of the monument contain the creosote-bursage plant community. This plant community occurs over the open expanses between the mountain ranges, and connects the other plant communities together. Rare patches of desert grassland also occur in the Sand Tank Mountains area. The washes in the area support a much denser vegetation community than the surrounding desert, including mesquite, ironwood, paloverde, desert honeysuckle, chuperosa, and desert willow, as well as a variety of herbaceous plants. This vegetation offers the dense cover bird species need for successful nesting, foraging, and escape, and birds heavily use this plant community during migration.

These diverse plant communities present in the monument support a wide variety of wildlife, a robust population of desert bighorn sheep, especially in the Maricopa Mountains area, and other mammalian species such as mule deer, javelina, mountain lion, gray fox, and bobcat. Bat species within the monument include the endangered lesser long nosed bat, the California leaf-nosed bat, and the cave myotis. Over 200 species of birds are found in the monument. Numerous species of raptors and owls inhabit the monument including the elf owl and the western screech owl. The monument also supports a diverse array of reptiles and amphibians, including the Sonoran desert tortoise and the red-backed whiptail. The desert tortoise occupies approximately 25,000 acres of habitat in the Maricopa Mountains.

## **Decision Area**

While the planning area encompasses approximately 496,000 acres spanning two counties and areas of private land, BLM management applies only to public lands, meaning those lands where BLM has management responsibility for either the surface or the subsurface estate. Therefore, the Decision Area encompasses 486,400 surface acres of public lands and 461,000 acres of subsurface land.

# Sonoran Desert National Monument Resource Management Plan Amendment Planning Area



While every effort has been made to ensure the accuracy of this information, the BLM makes no warranty, expressed or implied, as to the accuracy and expressly disclaims liability for the accuracy thereof. No warranty is made by the BLM for the use of this map for purposes not intended by BLM.

Map 1

## Scoping Process

The formal scoping period began with publication of the Notice of Intent (NOI) in the *Federal Register* on January 21, 2016. The NOI was provided for public consideration at three (3) scoping open houses and was posted at: <https://federalregister.gov/a/2016-01187>. The scoping period for receipt of public comments ended March 21, 2016. Notice of the proposed Plan Amendment was posted on the NEPA Register (e-planning) and Project websites on January 21, 2016.

**Congressional:** The Monument falls in both Reps. Raul Grijalva and Kyrsten Sinema's Congressional districts. Personal calls were placed to their offices, as well as those of Senators John McCain and Jeff Flake.

**State Government:** The BLM Arizona State Director called the Arizona Game & Fish Director.

**RAC:** The BLM Arizona State Director called the RAC chairman and requested his assistance in ensuring their represented interests receive factual information about the project.

**Key Stakeholders:** BLM Arizona reached out to Tread Lightly!; U.S. Forest Service; Federal Lands Hunting, Fishing and Shooting Sports Roundtable; U.S. Fish and Wildlife Service's Wildlife, Hunting, Heritage Conservation Council (WHHCC) and other partners in the Sonoran Landscape Project ensuring they understood BLM's next steps and to ensuring their stakeholders received factual information.

**Media:** BLM Arizona proactively reached out to *E&E News*, the *Arizona Republic*, *Arizona Daily Star*, *KJZZ (Public Radio)*, local TV stations and the *Associated Press* providing the opportunity for interviews/backgrounders, emphasizing that the plan amendment is court-ordered and highlighting the proactive work the BLM has done to form partnerships across the state in an effort to find long-term solutions to the recreational target shooting issue on public lands.

**Video:** BLM Arizona updated the video used to announce the target shooting closure announcing the start of public scoping.

**Social Media:** Following notification of the key stakeholders listed above, BLM Arizona posted an updated video and shared the statement below on Facebook, Twitter and other social media and also highlight the significant education, outreach and stewardship activities of the Sonoran Desert Project partnership.

**Public Website:** Following the notification of key stakeholders, BLM Arizona posted the initial statement on the public website and linked to that statement in Twitter.

**Press Releases:** On January 22, 2016 a press release was issued notifying the public that the NOI was published and indicating the start of the public comment period. On February 2, 2016 a press release was issued announcing the times and locations of the public scoping meetings.

**Public Meetings:** Three public scoping meetings were held in the vicinity of the planning area in February 2016 as follows:

February 24<sup>th</sup> from 5:30pm – 9:30pm  
Arizona Game & Fish Department  
5000 West Carefree Highway  
Phoenix, Arizona 85086

February 25<sup>th</sup> from 4:00pm – 8:00pm  
Gila Bend Community Center  
202 North Euclid Avenue  
Gila Bend, Arizona 85337

February 26<sup>th</sup> from 4:00pm – 8:00pm  
Estrella Mountain Regional Park  
14805 West Vineyard Avenue  
Goodyear, Arizona 85338

The format of the scoping meetings was informal, one-on-one discussions between BLM representatives and members of the public.

Approximately 910 scoping letters were mailed and an additional 1,387 emailed to interested parties in January 2016. The postcard informed the recipients of the scoping meetings and purpose, as well as the dates and locations. Recipients included congressional representatives; state and local government officials and agencies; tribal leadership; national, state and local organizations; local business owners; private landowners; and interested individuals. The BLM compiled the mailing list, from individuals, agencies and organizations that have participated in past BLM projects, those requesting to be on the mailing list, and those who have an interest. E-mails were also sent to 1,387 members of the public, agencies and organizations on January 21 2016.

The scoping process included discussions and reviews from the Interdisciplinary Team (IDT), meetings with the Consulting Parties and Cooperating Agencies, three public open houses, websites (<http://1.usa.gov/1ZPyFSA>), and an invitation for the public to provide written comments.

### **Cooperating Agencies**

On March 23, 2016 Cooperating agency letters were sent out to the following:

#### **Tribes:**

##### **Ak-Chin Indian Community**

Tribal Chair  
Mr. Louis Manual, Jr., Chairman  
42507 W. Peters and Nall Road  
Maricopa, Arizona 85239

Cultural Resources Manager  
Ms. Carol Antone  
42507 W. Peters and Nall Road  
Maricopa, AZ 85239

Cultural Resource Specialist – Land Management  
Mary Anna Soliz  
42507 W. Peters and Nall Road  
Maricopa, AZ 85139

The Hopi Tribe

Tribal Chair  
Mr. Herman Honanie, Chairman  
The Hopi Tribe  
P.O. Box 123  
Kykotsmovi, AZ 86039

Cultural Preservation Office  
Mr. Leigh Kuwanwisiwma, Director  
P. O. Box 123  
Kykotsmovi, AZ 86039

Mr. Terry Morgart  
P. O. Box 123  
Kykotsmovi, AZ 86039

Salt River Pima-Maricopa Indian Community

President  
Mr. Delbert Ray, Sr.  
10005 E. Osborn Road  
Scottsdale, AZ 85256

Cultural Preservation Department  
Mr. Shane Anton, Manager  
10005 E. Osborn Road  
Scottsdale, AZ 85256

Mr. Matthew Garza  
10005 E. Osborn Road  
Scottsdale, AZ 85256

Gila River Indian Community

Governor  
Mr. Stephen R. Lewis  
P.O. Box 97  
Sacaton, AZ 85147

Tribal Historic Preservation Officer  
Mr. Barnaby V. Lewis  
P.O. Box 2140  
Sacaton, AZ 85147

Archaeological Compliance Specialist  
Mr. Larry Benallie, Jr.  
P.O. Box 2140  
Sacaton, AZ 85147

Tohono O'odham Nation

Tribal Chair  
Mr. Edward Manuel, Chairman  
P.O. Box 837  
Sells, AZ 85634

Tribal Historic Preservation Officer  
Mr. Peter Steere  
P.O. Box 837  
Sells, AZ 85634

Wildlife and Vegetation Management  
Holly Barton  
P.O. Box 837  
Sells, AZ 85634

**Federal Agencies:**

United States Fish and Wildlife Service  
Steve Spangle, Field Supervisor  
2321 West Royal Palm Road Suite 103  
Phoenix, AZ 85021

National Park Service  
Naomi Torres, Superintendent

Juan Bautista de Anza National Historic Trail  
333 Bush Street, Suite 500  
San Francisco, CA 94104

United States Air Force, Luke Air Force Base  
BMGR Luke Air Force Base  
56th Fighter Wing Public Affairs  
Luke Air Force Base, AZ 85309

Tonto National Forest  
Tonto National Forest Supervisor's Office  
2324 E. McDowell Rd.  
Phoenix, Arizona 85006

Prescott National Forest  
Supervisor Teresa Chase  
Prescott National Forest Supervisor's Office  
2971 Willow Creek Road, Bldg. 4  
Prescott, AZ 86301

**State Agencies:**

Arizona Game and Fish Department  
Arizona Desert Bighorn Sheep Society  
5000 W. Carefree Highway  
Phoenix, AZ 85086

Arizona Game and Fish Department  
Region 4  
9140 E. 28th Street  
Yuma, AZ 85365

Arizona Game and Fish Department  
Region 6  
7200 E. University Drive  
Mesa, AZ 85207

**State Historic Preservation Office (SHPO):**

James Garrison  
State Historic Preservation Office  
Arizona State Parks  
1100 W Washington Street  
Phoenix, AZ 85007

## **Local Governments:**

Arizona Governor's Office  
The Honorable Doug Ducey  
Governor of Arizona  
1700 West Washington Street  
Phoenix, AZ 85007

Maricopa County  
Tom Manos Maricopa County Manager  
301 W. Jefferson, 10th Floor  
Phoenix, AZ 85003

Pinal County  
Mr. Greg Stanley, Pinal County Manager  
31 N Pinal Street  
Florence AZ, 85132

Town of Gila Bend  
Mayor Chuck Turner  
644 W. Pima St.  
Gila Bend, AZ 85337

City of Maricopa  
Mayor Christian Price  
39700 W. Civic Center Plaza S.  
Maricopa AZ 85138

City of Goodyear  
Mayor Georgia Lord  
190 N Litchfield Rd  
Goodyear AZ 85338

## **Collaboration and Consultation with Tribes**

On February 16, 2016 Tribal consultation letters were sent out to the following tribes:  
Ak-Chin Indian Community

Tribal Chair  
Mr. Louis Manual, Jr., Chairman  
42507 W. Peters and Nall Road  
Maricopa, Arizona 85239

Cultural Resources Manager  
Ms. Carol Antone  
42507 W. Peters and Nall Road

Maricopa, AZ 85239

Cultural Resource Specialist – Land Management  
Mary Anna Soliz  
42507 W. Peters and Nall Road  
Maricopa, AZ 85139

The Hopi Tribe

Tribal Chair  
Mr. Herman Honanie, Chairman  
The Hopi Tribe  
P.O. Box 123  
Kykotsmovi, AZ 86039

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Mr. Leigh Kuwanwisiwma, Director  
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Mr. Terry Morgart  
P. O. Box 123  
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Salt River Pima-Maricopa Indian Community

President  
Mr. Delbert Ray, Sr.  
10005 E. Osborn Road  
Scottsdale, AZ 85256

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Mr. Shane Anton, Manager  
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Scottsdale, AZ 85256

Mr. Matthew Garza  
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Governor  
Mr. Stephen R. Lewis  
P.O. Box 97  
Sacaton, AZ 85147

Tribal Historic Preservation Officer  
Mr. Barnaby V. Lewis  
P.O. Box 2140  
Sacaton, AZ 85147

Archaeological Compliance Specialist  
Mr. Larry Benallie, Jr.  
P.O. Box 2140  
Sacaton, AZ 85147

Tohono O'odham Nation

Tribal Chair  
Mr. Edward Manuel, Chairman  
P.O. Box 837  
Sells, AZ 85634

Tribal Historic Preservation Officer  
Mr. Peter Steere  
P.O. Box 837  
Sells, AZ 85634

Wildlife and Vegetation Management  
Holly Barton  
P.O. Box 837  
Sells, AZ 85634

**Issue Summary**

Preliminary Issues identified during scoping:

1. Proclamation
2. Public Safety
3. Socioeconomic
4. Partnerships and Community Involvement
5. Impacts to Natural Resources
6. Impacts to Wildlife
7. Impacts to Cultural Resources / NHPA Section 106
8. Monument Objects
9. Noise/Solitude
10. Hazmat/Chemicals
11. Alternative Areas for Target Shooting
12. Enforcement / Supplementary Rules
13. Other Impacts to the Monument (other than Target Shooting)
14. Scientific Data/Analysis

15. Limited Accessibility / Zoned Areas
16. Positive Contributions
17. FLPMA/Multiple Use Mandate / Public Lands Access Rights
18. Cumulative Impacts
19. Mitigation
20. Federal Jurisdiction

The BLM received 376 scoping comment letters. Of these, 325 were submitted electronically via email, and 10 were submitted electronically via the BLM's ePlanning system. In addition, 29 were submitted on BLM comment forms at the public information meetings held in February 2016, 10 were mailed letters, and 2 were received via fax.

Some comments were received more than once. For example, a small number of comment letters were faxed and emailed or emailed and mailed. Where possible, duplications were paired up and counted as only one comment letter; however, only a few were duplications. Comment letters that were addendums to previous submissions or represented additional comments were counted as a second letter.

All scoping comments were read and reviewed. Of the 376 total comments received, 113 were coded as opinion only and did not contain a specific theme. The remaining 263 scoping comments were coded into 20 subject categories, as specified above. All 263 comments were entered into a tracking spreadsheet and organized by category and sub-category.

Following is a summary of the scoping comments by category. For this scoping report, and because of ecological or behavioral relations, some issues apply to more than a single category for sorting or analysis purposes. As a result and for ease of reading, some resources have been grouped in order to simplify the format of the analysis.

### **Presidential Proclamation / Monument Objects**

A number of comments centered on the importance of the Monument's Presidential Proclamation and the importance of protection of Monument Objects. Some commenters specifically indicated that allowing recreational target shooting on any areas of the SDNM goes against the reasons National Monuments are set aside for the public's enjoyment. A significant number of these commenters specifically mentioned damage and vandalism to the Saguaro Cactus. Commenters also mentioned that there are other adequate areas designated for target shooting on BLM lands around the perimeter and outside the Monument, while others recognized that if more Federal lands for recreational target shooting are needed, they should be in areas with broad multiple use management policies and not in designated Monuments.

### **Public Safety**

Safety related to target shooting on the Monument was a main theme in the majority of comments, both in negative as well as with associated mitigation actions that could eliminate or

significantly reduce unsafe situations. Comments on safety ranged anywhere from completely disallowing target shooting, to allowing it with appropriate safety measures. A great deal of concern was expressed by some members of the public about feeling safe in areas where target shooting is allowed, a select few have personally experienced shooting in their direction by others engaging in the activity, and even others expressed that allowing shooting then essentially disallows other activities due to safety issues. Some comments from shooting enthusiasts stated that although shooting sports are an important recreation pastime in Arizona, due to population increases and the number of suitable places for shooting being smaller, an increase in the number of recreationists, usage conflicts and accidents are possible. Last, a significant number of commenters stated that they would like to see some target shooting allowed, but only in a very safe manner, far away from residences, highways, roads, parking lots, and where other recreationalists frequent. Safety measures that include berms and hills as safe backstops were also seen as necessary. A few other comments included thoughts that a permanent closure to target shooting would simply shift shooting and its associated problems to new areas within or adjacent to the planning area, making it just as undesirable and/or unsafe.

### **Socio-economic**

The Monument designation and management can impact economic and social opportunities and/or circumstances for the local community through recreational opportunities and tourism. A number of commenters emphasized contributions to the local economy from target shooters who use local services such as hotels and restaurants, specifically hunters who utilize the area for practice prior to hunting, and campers who incorporate recreational target shooting into their hiking and camping trips to the Monument. One commenter mentioned that sportsmen and women use Federal lands for target shooting to practice and sight-in rifles, and by purchasing hunting tags, they contribute taxes to support the land and wildlife. Other socioeconomic benefits were quality and ways of life for Arizona residents, family traditions that have always included shooting in their activities, and teaching children how to shoot responsibly in an outdoor environment at a relaxed pace rather than in a stressful and loud shooting range environment. A number of comments simply indicated that target shooting has always been an enjoyable activity for them, and that most responsible shooters clean the areas in which they shoot, resulting in less money needing to be spent on Federal clean-up. Last, a few comments mentioned that by providing too many target shooting opportunities on public lands, the private shooting range market will actually be suppressed.

### **Partnerships, Outreach and Education**

Many commenters expressed their ideas relating to enhancing current partnerships and forming new ones with outside agencies and groups to provide outreach and education to the public on gun safety and responsible shooting. They ask BLM to consider on- and off-site outreach and education of target shooters and other users of the SDNM. A significant number of commenters asked BLM to consider partnering with gun stores, gun show exhibitors, and the shooting community to help resolve user conflicts, decrease resource degradation, and provide accurate

education and information about areas that are open and closed to target shooting. Many are members of these groups themselves, and have offered their assistance. Even others suggested regularly-scheduled clean up events they would help advertise. A number of commenters who belong to the shooting community recommended utilizing the assistance of these groups, perhaps creating Memorandums of Agreement and adding that because they are the ones using the lands for this purpose, they can make a direct impact.

### **Impacts to Natural Resources, Habitat and Its Uses**

#### *Vegetation*

Vegetation on the SDNM includes saguaro cactus forests, rosewoods and junipers, as well as much denser vegetation community in the wash areas, including mesquite, ironwood, paloverde, desert honeysuckle, chuperosa, and desert willow, as well as a variety of herbaceous plants. It was recognized that this vegetation provides dense cover for bird species necessary for nesting, foraging and escaping. Commenters expressed concern that not only can target shooting vandalize the diverse vegetation of the SDNM, it can be permanent, the vegetation is considered a Monument Object, and this damage would negatively impact habitat.

#### *Wildlife and Special Status Species*

Prominent wildlife on the SDNM includes the grey fox, mountain lion, desert bighorn sheep, mule deer, javelina and bobcat. Special status species include the endangered Sonoran pronghorn and lesser long-nosed bat. In addition, over 200 species of birds, including raptors and owls, have been observed on the monument, as well as a diverse array of reptiles. These are protected species on the Monument. There was significant concern amongst commenters as to how these species will be managed if target shooting was allowed, and how fragmentation of wildlife would be avoided with the presence of target shooting. Would the BLM restrict activities in certain areas during certain times of year to avoid negative impacts to breeding or nesting birds or wintering populations of big game? Could specific areas be set aside so as to not negatively affect wildlife? Does wildlife need protection from target shooting activities, and if so, how can this be done? Other concerns centered entirely on garbage and trash that could consume the area, resulting in damage of the habitat and possible consumption of the trash by wildlife, mistaking it as food.

### **Impacts to Cultural Resources and Historic Properties**

Regarding safe access to rock art sites by tribes wishing to visit for religious and/or cultural reasons and for protecting the auditory, visual and physical integrity of these sites, a few commenters suggested that BLM address the issue of Native American religious freedom rules. A few archaeologist-related groups and individuals are very concerned that increased access for any purpose, particularly target shooting activities, will definitely put fragile cultural and environmental resources at great risk. Their belief is that once access is granted for target

shooting, other activities such as illegal excavation of archaeological sites and the driving of vehicles in unauthorized areas will take place.

Concern amongst a significant group centered on both cultural and historical resources that can be seen as well as those that cannot or have not yet been discovered. Environmental resources are very delicate and could suffer gravely from increased traffic in this area.

The two Tribes who commented have requested interest in being cooperating agencies and continuing consultation with BLM during the Amendment/EIS process. The Gila River Indian Community was overwhelmingly against any recreational target shooting on the Monument and was in favor of closing it completely, while the Hopi Tribe expressed concern with any activity that has the potential to adversely affect cultural resources on the Monument.

In their comment letters, the American Rock Art Research Association asked if the priority is to provide a public-lands shooting range or to protect irreplaceable historic resources. They asked BLM to consider other places for recreational target shooting rather than in and around the unique and impressive rock art of the Monument. This rock art, once damaged, will never be repaired. In addition, they commented that while other areas can be set aside for target shooting, this rock art can only be studied and enjoyed in the place where it was made and protected by generations of Native Americans.

Some commenters wrote in with their support of target shooting in specific areas once an inventory was completed for any cultural resources. They understand the need to zone areas that do not contain these artifacts, while other groups are simply in favor of target shooting anywhere on public lands.

### **Noise**

Noise was a significant theme amongst many of the comments received. All of these understand that BLM's Monuments are Presidential Proclamations set aside for specific conservation efforts, over and above regular multiple use management principles on BLM lands. As such, these comments were received from a number of groups and individuals who are deeply concerned about noise pollution and the negative impact it has on enjoying quiet recreational opportunities and the solitude expected in a National Conservation Lands area, but also the negative impacts noise can have on wildlife over time.

All comments received on the subject of noise determined it to be a negative issue. Overall, these commenters desire to recreate on designated wilderness areas while enjoying the solitude indicative of these areas. Some ask that, at the very least, wilderness areas of the Monument be spared any recreational target shooting, with others asking for full closure of the Monument to target shooting, stating that there are other areas to shoot on federal lands, and that BLM should designate areas outside of the Monument or in alternate areas, to allow shooting activities. A few indicated that a balance could be found if BLM set aside concentrated zones for shooting, allowing the remainder of the Monument to provide solitude for recreationists. Last, a few

commented that in their own experience, noise from target shooting greatly detracted from their enjoyment of the land until they had covered over two miles.

### **Hazardous Materials and Trash**

Recreational target shooting can result in an abundance of trash and many are concerned that some of this trash could be hazardous to humans, wildlife, and the surrounding environment. In addition, many comments were directly related to the amount of “trigger trash”, or metals/bullet casings resulting from shooting that can be found at shooting sites on Federal lands. Even those who are avid shooters and have frequented the SDNM for this purpose, admit this is the one issue they wish could be resolved and are disappointed about. Many shooters indicated in their comment letters that they bring their own bags and clean up not only their residual trash, but others’ trash, as well. How can the BLM reduce trigger trash and environmental degradation?

It is supposed by commenters that a great deal of the trash on the SDNM is attributed to illegal dumping and illegal trespassing by way of the border, and shooting enthusiasts feel negative and have expressed their displeasure at being the prime targets of trash and litter on the Monument. Many comments on this also tie into the Education/Partnership Issue in that they provide ideas as to how trigger trash and dumping might be prevented and/or managed in the long-term. They suggest clean up days, monitoring, and additional enforcement, which ties into the enforcement issue, but also temporary closures as needed for mitigation purposes. Would a closure simply shift the trigger trash, illegal dumping, environmental risks and lead contamination to new areas/locations? Commenters tend to disagree on how much trigger trash is considered hazardous waste, but they do suggest BLM uses its own data analysis to make these decisions.

Approximately 10 commenters specifically mentioned contamination from lead shot onto the landscape and in the habitat, possibly having negative cumulative effects on the wildlife that comes into contact with these areas. One commenter specifically mentioned cumulative costs that could result in environmental damage clean-up.

### **Enforcement, Application of Supplementary Rules & Mitigation**

Enforcement of current BLM supplementary rules and policy was a common theme for the majority of commenters with identified issues. Many comments centered on BLM enforcing rules on those users who litter and vandalize the SDNM rather than fully closing the Monument, which punishes everyone. Questions were asked about law enforcement practices that would be more effective and/or economical than closure, such as increased patrols, and while some believe that these supplementary rules can be enforced to some extent in if target shooting was concentrated to specific areas, most who commented on this issue agreed that it is impossible to successfully monitor and enforce rules in if the entire area, or even the majority, of the Monument was completely open to target shooting. Some comments were submitted by the public who agreed that the only way to enforce would be to either keep the entire monument open with no management actions, or close it altogether.

There was concern that BLM cannot address and fully monitor violations. Some commented that the BLM should add penalties in the form of fines to shooters who leave trash and others who dump on public lands, as well as those who shoot in closed areas. Others had ideas about a possible permit system to use zoned areas that may prove effective. Some added that perhaps implementing a fee for permits or for access could be used toward necessary and periodic clean-up of these areas. Some users admit that they witness a great deal of litter and trash in areas in which target shooting is taking place, they have seen vandalism of some cultural resources in the form of rock art, and clearly understand the limitations that are being considered due to the fact that enforcement is almost impossible.

Commenters who belong to shooting and sportsmen's and women's clubs indicated that these groups would be willing to assist the BLM with enforcement of areas open to target shooting. They indicate that since they understand shooting rules and are on the ground anyway, they could offer assistance. Some also added that without the support of outside groups, there is no way that target shooting on the Monument would provide successful without damage to Monument Objects. Others claim to be committed to partnering with the BLM and other shooting groups to assist with the management of target shooting areas and recommend that a plan be put in place to proceed with this.

### **Scientific Data and Analysis**

About 12 commenters mentioned BLM's data and analysis related to target shooting areas. Out of these, most recommended that BLM use the data and science that they gathered during the formation of the original Resource Management Plan; that if they were to follow that and make the decision using those results that would be sufficient. A few believe the analysis was sound and thorough and interpreted it to read that target shooting should be allowed in accordance with it, while other groups interpreted it to illustrate that target shooting would not be feasible on the Monument. Some commenters emphasized the necessity of a complete survey of rock art within the planning area, conducted by professional archaeologists, if the decision is made to allow shooting in the Monument.

### **Zoned Areas and Limitations of Accessibility / Alternate Areas**

The majority of the comments received discussed zoned areas to some extent. Many are in favor of setting aside specific areas for target shooting, understanding BLM's multiple use mandate as well as the conservation decisions they must manage.

Some were in favor of very concentrated, easily accessible areas that could be used and enforced, and that were safe with natural backstops, while others were in favor of zoning a much larger area (or a number of areas) on the Monument. Most of the comments understood and recommended that the BLM find, at the very least, a few safe areas for target shooting that could create a balance of resources usable for all. A number of these comments came from individuals, but also from some wildlife groups and support partners such as the Public Lands Foundation.

A significant number of commenters asked the BLM to designate alternate areas outside of the Monument for target shooting. The State of Arizona wrote in as well, notifying BLM that it is planning a recreational park outside of, but in close proximity to, the Monument. It asked BLM to partner with them in an agreement to create a shooting park.

Other commenters are unhappy that an increasing amount of public lands are being closed to shooting due to designation of specific lands and the encroachment of the urban interface. These commenters have a desire for places to shoot; many indicated they did not care where they could practice this activity as long as they were out on the lands, while others do not understand why the Monument would be zoned off or closed entirely. This theme was one of the most popular, whether it was for zoning or against it altogether.

### **Cumulative Impacts**

Comments about cumulative impacts centered on the idea that closures to target shooting concentrate the activity. One outlook is positive in that concentration of the activity allows for easier enforcement and mitigation in the form of clean up because allowed areas are so small, while the other outlook is that because the activity is concentrated, it receives more dense usage, and may necessitate clean up and mitigation measures more often than the BLM could enforce, handle, or fund.

Almost all of the comments received on this issue, that showed concern for any natural and cultural resource, also mentioned cumulative impacts to these resources. Specifically mentioned was that negative impacts of target shooting, over time, proves especially detrimental to Monument Objects such as specific vegetation (i.e., the saguaro cactus) as well as cultural resources (i.e., rock art), because damage to these resources is irreversible.

### **Anticipated Decision to be Made**

The BLM Arizona State Director is the deciding official responsible for approving this Land Use Plan Amendment. Given the purpose and need for the action, the deciding official will review the proposed action, the alternatives, and the environmental consequences in order to make the decision of whether and how to amend the Sonoran Desert National Monument Resource Management Plan in such a way as to comply with the Court's March 27, 2015 order.

### **Issues that Will Not be Addressed in the EIS**

Certain types of comments do not warrant analysis in the EIS because they do not provide information that is helpful or relevant to make a reasoned choice among alternatives. Comments that are not helpful or relevant include personal opinion with no supporting reason(s), discussion of other projects or project areas unrelated to recreational target shooting (beyond the scope of

the plan amendment), statements of disagreement with BLM or Proclamation policies, and/or simple statements of agreement or opposition to the project.

Issues beyond the scope of the plan amendment include all items not related to decisions that would occur as a result of this planning process. In short, they include decisions that are not under the jurisdiction of the SDNM or are beyond the capability of the SDNM to resolve as part of this target shooting plan amendment.

Issues identified in this category are as follows:

1. Federal Jurisdiction and Second Amendment Rights

Comments regarding target shooters rights and if a target shooting closure or restriction constitutes an infringement on second amendment rights.

BLM Response: Public lands are open to target shooting, except in areas that are closed for public safety or in areas closed under planning decisions. A discussion about the second amendment which grants the right to bear arms is not directly linked to the act of target shooting. Citizens can carry weapons throughout the Planning Area as provided under State and County ordinances.

2. Impacts to Monument Objects by Items Other than Target Shooting

Comments claiming that other recreational and non-recreational activities other than target shooting negatively affect Monument Objects and areas within the Monument and that more attention should be paid to those sources.

BLM Response: In general, locations where target shooting takes place is, in certain degrees, full of trash...much of which has been shot up. Whether this trash was already in these areas, or brought in by non-target shooters or target shooters and then used as a target is outside the scope of this document. In addition, while other recreational activities do contribute to ecosystem damage in the planning area, this plan amendment focuses on the damage and public safety issues created by target shooting within the area. For this plan amendment, the ecosystem damage created by other recreational activities is outside the scope of this document.

3. Overarching (Multiple Use Mandate / Public Lands Access)

Comments that claim all land users have a right to access all public lands in accordance with FLMPA and BLM's multiple use policy, and, in addition, the freedom to perform any activity with no restrictions.

BLM Response: While all BLM lands are to be managed under BLM's multiple use mandate, designated lands part of the National Conservation Lands are managed with a dominant conservation mission. Established in 2000 through a Secretarial Order signed by the Secretary of the Interior, the mission of the National Conservation Lands was to create a special system of BLM-managed lands managed to protect the values for which they were designated, including, where appropriate, prohibiting uses that are found to be inconsistent with those values. In 2009, through OPLMA, Congress permanently

established the National Conservation Lands “to conserve, protect, and restore nationally significant landscapes” (Secretarial Order 3308, November 15, 2010). Presidential Proclamation 7397, which was signed on January 17, 2001, identifies the values for the SDNM (see introduction).

In addition to this list, other program-specific issues were identified during the public scoping process beyond the scope of this plan amendment. The following issues are out-of-scope for this plan amendment for the stated reasons. The scope of the plan amendment was limited to target-shooting only.

### Valid and Existing Management to be Carried Forward

Desired future conditions, management goals, and management actions that are not directly related to recreational target shooting management in the Sonoran Desert National Monument will be unchanged.

### Participants and Their Views

#### **Individuals**

*Comments received by individuals spanned between allowing recreational target shooting entirely, closing the Monument from recreational target shooting entirely, and creating special areas or “zones” to allow recreational target shooting while not allowing it in the rest of the Monument.*

#### **Shooting Interests**

National Rifle Association  
Wildlife and Hunting Heritage Conservation Council

*Comments received from shooting interest groups were overwhelmingly in favor of keeping lands open to recreational target shooting on the Monument. A few individual NRA members expressed their understanding that trash was a significant issue, that keeping the entire Monument open to recreational target shooting would not be realistic, and recommended specific zones for target shooting.*

#### **Wildlife and Hunting/Outdoor Groups**

Arizona Wildlife Federation  
Desert Christian Archers, Inc.  
Wildlife and Hunting Heritage Council

- Ducks Unlimited
- University of Wisconsin – Stevens Point
- Congressional Sportsmen’s Foundation
- Theodore Roosevelt Conservation Partnership

- Urban American Outdoors
- The Wildlife Society
- The Nature Conservancy
- Great Lakes Indian Fish and Wildlife Commission
- Boone and Crockett Club
- Mule Deer Foundation
- National Wildlife Federation
- Former New Mexico Secretary of Energy, Minerals & Natural Resources
- National Shooting Sports Foundation
- Backcountry Hunters & Anglers
- National Wild Turkey Foundation
- Pheasants Forever
- Arizona Game & Fish Department
- Wildlife Management Institute

Arizona Sportsmen for Wildlife Conservation (*Includes the following groups*):

- Anglers United
- AZ Antelope Foundation
- AZ Bass Federation Nation
- AZ Big Game Super Raffle
- AZ Bow hunters Association
- AZ Catfish Conservation Association
- AZ Chapter National Wild Turkey Federation
- AZ Chapter Safari Club International
- AZ Council of Trout Unlimited
- AZ Deer Association
- AZ Desert Bighorn Sheep Society
- AZ Elk Society
- AZ Houndsmen
- AZ Outdoor Sports Coconino Sportsmen Mohave Sportsman Club Outdoor Experience 4  
All South Eastern AZ Sportsmen Club
- Theodore Roosevelt Conservation Partnership SRT Outdoors
- The BASS Federation
- Xtreme Predator Callers
- 1.2.3.Go...

*Comments received from Hunting and Wildlife organizations were mostly in favor of keeping the Monument open to target shooting, with a number of ideas and thoughts on the importance of enforcing supplementary rules. Comments suggested partnerships with their groups to enforce rules, create a permit and/or fee system, and educate the public on hunting and safe shooting practices. Some added that if the entire Monument could not be open to target shooting, they would be supportive of zones or specific areas. There was significant support of BLM creating zones for recreational target shooting, and an accompanying commitment to form an agreement to assist with the management and mitigation of these areas.*

## **State and Local Agencies/Governments**

Arizona Game and Fish  
Pinal County

*Comments recognize and promote multiple uses on public lands for the purposes of marksmanship practice and maintenance, public safety, hunter education, competition, and lawful hunting. A high priority is placed on maintaining all wildlife-related outdoor recreational opportunities, including recreational shooting. They indicate it also provides a safe and informal opportunity, especially for youth participants in formal shooting sports, and other outdoor recreational activities such as hunting.*

## **Grazing Interests**

Pale Horse Cattle Company

*One comment from a grazing interest runs cattle on the Monument and was overwhelmingly not in favor of opening the SDNM for recreational target shooting due to some safety and vandalism concerns that the organization has experienced.*

## **Environmental Organizations**

The Wilderness Society  
Western Watersheds Project  
Conservation Lands Foundation  
Arizona Conservation Partners  
Sierra Club – Grand Canyon Chapter  
Friends of the Sonoran Desert  
The Wildlife and Wilderness Education  
Archeology Southwest  
National Trust for Historic Preservation  
Arizona Wilderness Coalition  
Arizona Conservation Partners  
Tucson Audubon Society

*Comments received from environmental organizations were overwhelmingly against any recreational target shooting on the Monument, citing the importance of the declaration of the Sonoran Desert National Monument, and the significance of the Monument objects and values over discretionary uses. They assure that the purpose of the designation of the Monument into the BLM's National Conservation Lands system is not being prioritized if target shooting is allowed, mitigation measures would not be effective, and they are concerned that the BLM will not fully account for the direct, indirect and cumulative impacts.*

## **Land Use Partners**

Public Lands Foundation

*Comments from the Public Lands Foundation recognize the need for balancing protection of the Monument's resources and providing for recreation. They support the need for more restrictive*

*measures and concentrated areas, as well as prohibited areas where Monument objects are found. They recognize the need for BLM, the shooting industry, nonprofit organizations and other interested parties to develop site specific plans for the monitoring, evaluation and cleaning up of all trash and disposing of hazardous materials.*

### **Federal Agencies**

Luke Air Force Base

*The Air Force base did not have specific comments to either opening or closing the Monument to target shooting; they just wanted to remain involved and informed.*

### **Cultural Interests**

Archaeology Southwest

Conservation Committee American Rock Art Research Association

*Comments from Cultural Interests were overwhelmingly against any recreational target shooting on the Monument and supported its closure to that activity. They believe that other areas outside of the Monument can be set aside for safe target shooting without jeopardizing Monument objects such as rock art and any other historic sites.*

### **Tribes**

Gila River Indian Community

The Hopi Tribe

*The two Tribes who commented have requested interest in being cooperating agencies and continuing consultation with BLM during the Amendment/EIS process. The Gila River Indian Community was overwhelmingly against any recreational target shooting on the Monument and was in favor of closing it completely, while the Hopi Tribe expressed concern with any activity that has the potential to adversely affect cultural resources on the Monument.*

## **Data Summary / Data Gaps**

The IDT will use the most accurate and current data available when analyzing the impacts of alternatives, so it is essential that data is from reliable and reputable scientific sources. In addition to the BLM, other agencies will provide any available geographic information systems (GIS) data used in land use planning analysis.

New and existing resource information in the Lower Sonoran Field Office (and/or other), including existing GIS thematic maps and monitoring data, will be used in formulating alternatives and in decision analysis for the Plan Amendment/EIS.

Pre-existing digital data been updated to the same standards required for new data to the best of our ability. The process of reviewing and updating data is important to the adequacy of the planning process, as the data is needed to quantify resources, create updated maps, and analyze information during alternative formulation. New data generated as part of the Plan

Amendment/EIS process will meet applicable established standards and will be available to the public upon request at the completion of the project.

## **Summary of Future Steps in the Sonoran Desert National Monument Plan Amendment / EIS Process**

With formal scoping completed, the Interdisciplinary Planning Team has begun work cooperating agencies to build a set of management frameworks, referred to as alternatives. The analysis of these alternatives forms the basis of the Draft Plan Amendment and EIS. A preferred alternative is selected through this process. The alternatives are presented in the Draft Plan Amendment/EIS and a Notice of Availability (NOA) is published in the Federal Register (FR) to inform the public that the document is ready for review during a comment period.

November 2016            Publish Sonoran Desert National Monument Draft Resource Management Plan Amendment and Environmental Impact Statement (DRMPA/DEIS)

November 2016 to      90-Day Public Comment Period  
February 2017

March 2017            Comments Compilation / Analysis / Report

Following the public comment period, the Interdisciplinary Planning Team will address the comments and develop a proposed final Sonoran Desert National Monument Plan Amendment and EIS, which will be published and made available to the public. A 30-day public protest period immediately follows after the NOA is issued announcing that proposed final document. The Arizona State Governor is also provided a 60-day period to conduct a consistency review.

June 2017            Publish Sonoran Desert National Monument Proposed Final Resource Management Plan Amendment and Environmental Impact Statement (PRMPA/FEIS)

Summer 2017            30-Day Public Protest Period and 60-Day Governor's Consistency Review

Following resolution of the protest period and completion of the governor's consistency review, the BLM will publish a NOA in the FR and publish a Record of Decision (ROD) in September 2017.

September 2017        NOA for the Record of Decision for the Sonoran Desert National Monument Final Resource Management Plan Amendment and Final Environmental Impact Statement