

Hunting and Wildlife Conservation Council

June 5, 2024

The Honorable Deb Holland
Secretary
Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

Dear Secretary Holland:

The Hunting and Wildlife Conservation Council (HWCC) and its predecessors have consistently prioritized keeping federal lands open to public hunting and recreational/target shooting. This dedication extends to collaborating with land managers to ensure that these activities are conducted ethically, with a profound respect for both natural and cultural resources, as well as structural improvements. The Council recommends that the Bureau of Land Management (BLM) establish clear criteria for the closure of areas for recreational shooting in alignment with the intent of Sec. 4103 of the Dingell Act.

The Council acknowledges the efforts made by the BLM in Arizona and New Mexico to develop formal shooting ranges that represent a reversal of a previous policy that prohibited land improvement for recreational/target shooting even if such improvements improved safety and responsible recreational shooting. Many of the non-governmental organizations represented by this Council have worked for years with the BLM, as well as the U.S. Forest Service, to ensure that the federal lands they manage remain open to these pursuits in a responsible manner.

However, recent BLM draft management plans raise concern about the future of recreational/target shooting, a historically and popular use of these lands. We believe that the BLM's land management plans are being driven toward greater closing of national monuments to recreational shooting, resulting in hundreds of thousands, if not millions of acres, proposed for closure. Two recent examples are prominent. The first is the one-half million-acre Sonoran Desert National Monument (SDNM), in Arizona. As a result of an out of court settlement, the BLM agreed to amend a recreational shooting management plan (that included the involvement of our predecessor councils), and to adopt the preferred alternative of the plaintiffs, the closure of 99% of the monument to recreational/target shooting.

The second draft management plan of concern is for Bears Ears National Monument (BENM), in Utah. As a management alternative, this plan proposes closing the entire

CHAIR
John Devney

VICE CHAIR
Collin O'Mara

MEMBERS

Andrew Schmidt
Colin Beck
Ryan Busse
Jeffrey Crane
Michael Crowder
George Dunklin, Jr.
Daniel Forster
Wayne Hubbard
Cole Mannix
Lucas Martinez
Brian Nesvik
Joel Pedersen
Land Tawney
Keith Tidball
Lauren Ward
Joel Webster

Designated Federal Officer

Douglas Hobbs
U.S. Fish and Wildlife Service
5275 Leesburg Pike, MS:OC
Falls Church, Virginia 22041
P 703-358-2336

1.3-million-acre monument to recreational/target shooting. The Council is concerned is that these two draft plans signal the intention of the BLM to use monument designation, and the Wilderness Act to close lands to all recreational shooting, even where specific recreational/target shooting or hunting activities are legally permissible – for example, hunting in designated Wilderness areas.

Moreover, there appears to be a trend within the agency to close large areas of public lands as a de facto “offset” for the establishment of shooting ranges. While we laud the BLM's effort to actively manage recreational/target shooting by building ranges, we do not support the closure of public lands, except for those lands surrounding a shooting range for safety purposes or where otherwise expressly prohibited.

We refer to Section 4103 of the Dingell Act that requires closures to be the "smallest area for the least amount of time that is required for public safety, administration and compliance with applicable laws." We do not believe that this requirement is being applied in these draft management plans. Therefore, we request that the BLM engage in discussions with the Council to develop criteria to fulfill the Dingell Act’s language to ensure that closures are consistent with the intent of Congress.

We welcome an opportunity to discuss our concerns with you and the Director of the BLM. Should you have questions or need more information, please contact Doug Hobbs, the Council’s Designated Federal Officer, at doug_hobbs@fws.gov or (703) 358-2336.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Devney', with a long horizontal flourish extending to the right.

John Devney
Chair

Cc: HWCC members
Steve Feldgus, Principal Deputy Assistant Secretary - Land and Minerals Management,
Department of the Interior
Matt Strickler, Deputy Assistant Secretary – Department of the Interior
Tracey Stone-Manning, Director – Bureau of Land Management