



THE STATE OF ARIZONA  
**GAME AND FISH DEPARTMENT**

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May 29, 2007

Mark Lambert  
IFNM Planning Lead  
Bureau of Land Management  
Tucson Field Office  
12661 East Broadway  
Tucson, AZ 85748-7208

Re: Comments on the Ironwood Forest National Monument Draft Resource Management Plan and Environmental Impact Statement

Dear Mr. Lambert:

The Arizona Game and Fish Department has reviewed the Ironwood Forest National Monument Draft Resource Management Plan and Environmental Impact Statement (RMP/EIS) and the following comments are provided for your consideration.

The Bureau of Land Management (BLM), Tucson Field Office (TFO) manages large areas of high quality fish and wildlife habitat including the Ironwood Forest National Monument (IFNM). Administration of healthy habitats by partnering with the Department to proactively manage fish and wildlife on public lands is essential in fulfilling civic trust responsibilities for the benefit of current and future Arizonans. The Department acknowledges the hard work you and your staff have invested in developing the IFNM RMP, and we appreciate the opportunity to meet with your office at various times during the planning process as a Cooperating Agency with Jurisdictional Authority and Special Expertise to provide input and comments.

While we concur with many of the decisions within the document that have been cooperatively developed by our staff to ensure the Department's abilities to manage wildlife are not negatively impacted, the Department cannot fully support the preferred Alternative C as currently defined in the draft RMP/EIS. Several proposed decisions require either clarification and/or modification to: a) resolve the Department's remaining overarching and specific issues and concerns as outlined below, b) ensure consistency with the National Environmental Policy Act (NEPA) by providing affected agencies and the public with a clear and comprehensive document, and c) ensure consistency with decisions made statewide on other BLM RMPs on National Monuments. Resolution of these issues will contribute to consistent and successful management of fish and wildlife populations and their habitats for the continued enjoyment of future generations.

Mr. Mark Lambert

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The Department continues to be concerned with the lack of specific national or state guidance and/or policy from the Department of Interior regarding how the new market-based recreation program or Recreation Opportunity Spectrum (including Recreation Management Areas and Zones) and other allocations (i.e., areas managed for wilderness characteristics) will affect public recreational opportunities and Department wildlife management activities. These resource allocations are being used either separately or concurrently within the same plan and across planning areas without clear guidance or policy that outlines how decisions will be made after allocations are in place, and/or how those decisions would be implemented on the ground. Thus, we are unable to adequately assess the impacts to fish and wildlife, their habitats, and the Department's ability to manage wildlife and wildlife-dependent recreation. We believe these uncertainties will lead to situations where individual managers may interpret decisions differently, creating inconsistencies in administration and coordination, ultimately impacting the Department's mission and authority across the state. The Department advises against applying allocations where overarching direction is not available. Additionally, we recommend that specific language be included within the plan to clarify how decisions should be implemented and how these decisions may affect other resources or uses. The Department further urges that the impact analysis consider the full range of possible implementation decisions in the absence of specific guidance and policy.

The Department understands the challenge of creating a succinct RMP that must meet objectives to manage for multiple resources and uses within the field office planning area over a 20 year period. The complex nature of managing multiple resources in concert can create perceived or real conflicts between Desired Future Conditions or management prescriptions for different uses, resources, or user groups. The Department is concerned several resources and/or uses may inherently conflict, and the proactive and timely management of fish and wildlife could suffer as a consequence. Without more specific national or statewide guidance, wildlife resources may be prioritized, considered, or evaluated at a lower level than those with clear national directives (e.g., guidelines for wilderness management, visual resource management, etc).

The Department and the BLM Arizona State Office have initiated a revision of the master statewide Memorandum of Understanding (MOU) to address these concerns. This MOU, when finalized, will provide additional context to better enable our respective agencies to resolve potential conflicts arising from RMP decisions that affect wildlife resources and wildlife-based recreation, and to interpret and apply decisions in a consistent manner statewide. The MOU revision has not yet been finalized. Therefore, to address our concerns in the interim and to ensure consistency in management, we request language be added to the RMP that reinforces our mutual commitment to cooperate and collaborate in the proactive management of fish and wildlife and their habitats, for all management prescriptions, designations, and allocations. We suggest this language should read:

*“Activities conducted by the Arizona Game and Fish Department to meet Trust Responsibilities to manage wildlife are recognized by BLM as consistent with decisions proposed in this RMP. The Arizona Game and Fish Department's ability to manage wildlife on lands administered by BLM in Arizona will not be diminished*

*or precluded during the life of the plan, based solely on singular or overlapping allocations, designations, and/or management prescriptions (such as those to manage for wilderness characteristics, visual resources, or primitive recreation). All implementation level plans and site-specific projects will continue to be evaluated through appropriate partnerships and through federal and state regulations. This RMP will reflect and support the spirit and intent of the statewide Memorandum of Understanding between BLM and the Arizona Game and Fish Department."*

A document of this size and complexity has the potential to negatively impact public participation during development of the RMP. We believe most constituents will find it difficult to thoroughly review and provide comments within the time allotted.

The Department is also specifically concerned with the lack of detail and clarity regarding the proposed designated route system, and suggests BLM further clarify which routes will be open, closed, or limited. The draft RMP map scale does not provide the level of detail necessary for careful interpretation of route designation decisions. Furthermore, route numbers are not clearly posted within the document and corresponding reference appendices are time consuming to interpret and not easy to digest or understand. Additional maps provided for review on BLM's website are not easily downloaded and do not provide adequate detail. The Department is also concerned with the lack of coordination between TFO and our staff during the development of route alternatives and the selection of the preferred alternative. The Department was integrally involved in route designation processes for other National Monument planning efforts (Sonoran Desert, Agua Fria, AZ Strip, etc.), and was not afforded this opportunity for the IFNM. The Department suggests BLM clarify route designation decisions within the document to provide the public a reasonable opportunity to review proposed route decisions, and further coordinate with the Department to meet both the intent of NEPA and our Cooperating Agency MOU.

The Department firmly supports continued recreational use of the area. The IFNM lies adjacent to the fast growing Tucson metropolitan area surrounded by National Parks and Forests, a National Conservation Area, a National Wildlife Refuge, a large Indian Reservation, and large blocks of State Trust and private lands where public recreational uses are prevented or restricted. The IFNM is one of the few remaining large blocks of public land in the Tucson area that supports a wide range of outdoor recreational activities. The Department believes that if managed properly, outdoor recreational activities can be consistent with the Monument Proclamation, and encourages BLM to support and promote these outdoor recreational activities within the IFNM including: dispersed recreational shooting (see attached Resolution), dispersed and group camping opportunities, and collection of firewood (see page-specific comments).

Additional page-specific comments are attached.

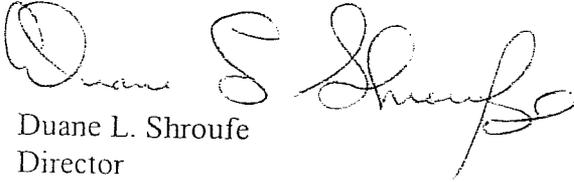
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The Department looks forward to continued collaboration with the TFO in refining and implementing the IFNM RMP. To that end, the Department requests an opportunity to meet and discuss our concerns before the Final RMP is published. Please contact Laura Canaca at 602-789-3437 to schedule a meeting.

Sincerely,

A handwritten signature in cursive script, appearing to read "Duane L. Shroufe".

Duane L. Shroufe  
Director

DLS:lc

Attachments

cc: Josh Avey, Habitat Branch Chief  
Gerry Perry, Regional Supervisor, Region V

**Page-Specific Comments**

Page	Section	RMP Statement and/or Preferred Alternative	Comment
S-4	<u>Soil and Water Resources</u>	“However, groundwater within and around the IFNM provides a variety of beneficial uses, including domestic, commercial, agricultural, and industrial uses.”	Please add “wildlife” to the list of beneficial uses of groundwater.
S-14	<u>Impacts on Special Designations</u>	“...ACEC would not continue because the IFNM designation and managed proposed for the IFNM would provide protection of the special status species for which the ACEC was established.”	<p>Suggest excluding ‘areas managed for wilderness characteristics’ for the same reasons ACECs are not included in the Monument. Suggest including language in this section to read: “Areas managed for wilderness characteristics will not be allocated because the IFNM designation and management proposed for the IFNM would provide protection for areas having wilderness characteristics.”</p> <p>The Department does not support the overlapping allocation of ‘areas managed for wilderness characteristics’ on the IFNM. The IFNM designation through Presidential Proclamation provides for natural resource protection, and the overlapping allocation of wilderness characteristics is redundant and unnecessary, and further complicates interpretation of allowable uses on the monument.</p> <p>Note: <i>managed</i> should read <i>management</i> in the previous column.</p>
2-10	<u>Soil and Water Resources</u>	4. “Prohibit surface-water diversions and groundwater pumping that removes water from the monument or adversely affects the monument’s values.”	<p>This could prohibit wildlife management projects such as wildlife water catchments, vegetation improvement projects, etc.</p> <p>Please clarify within the document under this decision to allow wildlife management and habitat improvement projects.</p>
2-13	<u>Vegetation</u>	2. “Removal and/or use	The Department supports Alternative D as

	Firewood	of living or dead and down native plant material is prohibited, with the following exceptions, when specifically authorized:”	the preferred alternative to allow the “collection of dead and down wood for firewood use while camping within the IFNM”.
2-17	<u>Wildlife and Wildlife Habitat</u>	Goal 3: “Maintain and enhance wildlife corridors between blocks of habitat.”	Suggest including within the document a reference to Arizona’s Linkages Workgroup and subsequent reports to promote consistency, cooperation, and coordination in regards to wildlife corridors and to provide current and future land managers a conduit to valuable information.
2-17	<u>Wildlife and Wildlife Habitat</u>	Objective 6: “Manage activities and uses to protect the following priority species...”	Suggest adding ‘game species’ to the list of priority species for consistency on RMPs statewide.
2-44	<u>Lands Managed to Maintain Wilderness Characteristics</u>	1. “Manage 9,510 acres of IFNM to maintain wilderness characteristics, as shown on Map 2-11.”	<p>The Department requests Alternative D be selected as the preferred alternative and eliminate the allocation of wilderness characteristic areas within the Monument.</p> <p>Motorized travel and recreation is regulated via the Presidential Proclamation, the Travel Management Plan, and Recreation Management Zones. Allocating an additional management layer is unnecessary and may interfere with AGFD’s ability to fulfill wildlife management objectives. Only very basic direction exists (from Washington and the State Office) pertaining to the allocation of areas to be managed for their wilderness characteristics. Based on the lack of clear and specific direction on management of areas with wilderness characteristics, the Department will be faced with a variety of interpretations of how these allocations should be applied, based on personnel and turnover in agency officials.</p> <p>We request that this decision be reconsidered to allow for public use along already established roadways.</p>

2-45	<u>Lands Managed to Maintain Wilderness Characteristics</u>	3. "Recreation setting conditions (particularly solitude, remoteness, facilities, encounters among visitors, evidence of use, and accessibility) in areas managed for wilderness characteristics would be in accordance with the Primitive RMZ objectives (as defined in Table 2-14)."	The Department does not support the use of the market based recreational program without clear direction on how the program should be applied, interpreted and implemented. We are especially uncomfortable with 'Primitive RMZs'. Many wildlife management activities may inherently conflict with the management criteria for 'Primitive RMZs' including hunting, wildlife water catchments, administrative access, etc. Without clear guidance on how this allocation will be used on the ground, it is impossible for the Department to analyze impacts to wildlife and wildlife management.
2-52 thru 2-59	<u>Recreation Management Zone Objectives</u>	Table 2-14	<p>Without clear guidance or policy that specifies how decisions will be made or implemented on the ground, conflicts may arise when managing via ROS or market-based strategies. For example, using ROS criteria (especially Primitive RMZ Objectives) could limit or conflict with wildlife management projects/facilities, volunteer activities, and hunting by exceeding recreation management outcomes in regards to group size, contacts, naturalness, evidence of use, facilities, and remoteness.</p> <p>The Department suggests clarification be made throughout the document to ensure such conflicts are resolution and provide further guidance on how ROS will be implemented on the ground.</p>
2-61	<u>Recreation</u> Camping	9. "Allow wood campfires only when firewood is from non-monument source."	<p>Alternative D should be selected as the preferred alternative: "Allow campfires using dead, down, and detached wood. Collection of wood for campfires may be restricted if needed as determined through monitoring."</p> <p>The Department does not support prohibiting the collection of dead, down, and detached wood within the Monument.</p>
2-62	<u>Recreation</u>	10. "Allow overnight	The Department does not support limiting

		<p>vehicle-based camping (including RVs) at identified sites only...approximately 100 sites potentially would be identified, subject to additional site-specific analysis.”</p>	<p>camping to designated sites only. Further, 100 sites are not adequate to accommodate the level of hunting opportunity offered to the public and may not allow the Department to meet management objectives using current hunt structures. The Department requests revising to allow dispersed camping Monument-wide.</p> <p>Last year, 2000 permits were allocated to javelina hunters with IFNM as a possible destination. This figure does not include small game hunters that could also be in the field at the same time. The Department strongly supports that Alternative A be chosen as the preferred alternative to allow dispersed vehicle-based camping such that hunters may disperse within the IFNM to facilitate management of wildlife populations. This activity can be regulated in cooperation with the Department, and on a case by case basis where needed.</p>
2-62	<p><u>Recreation</u>  Camping</p>	<p>12. “Large group camping is allowed at identified group sites only...Group camping could only occur at three identified large campsites...”</p>	<p>The Department does not support limiting camping to designated sites only (see above). This could have a significant impact on hunting, wildlife management projects, etc.</p>
2-63	<p><u>Recreation</u>  Use and Discharge of Firearms/ Target Shooting</p>	<p>“Prohibit the use and discharge of firearms within the IFNM, except for permitted or authorized hunting activities conducted in accordance with AGFD hunting regulations.”</p>	<p>It is recommended that Alternative A or D be selected as the preferred alternative to allow dispersed recreational shooting within the Monument. (See attached Resolution)</p> <p>The preferred Alternative C prohibits the use and discharge of firearms, except for hunting activities conducted in accordance with AGFD hunting regulations was proposed to negate the effects of littering, resource damage, and safety hazards. Alternative C is not enforceable without additional law enforcement on the ground. Similar restrictions on AZ State Land are</p>

			<p>also not enforceable nor effective in preventing wildcat shooting ranges. One of the most significant wildcat shooting areas within the Monument is currently on State Land where shooting bans are in effect. Increased enforcement of existing laws on littering, vandalism, and misuse of firearms is necessary to adequately address these concerns.</p> <p>Many people learn to shoot and become hunters through recreational shooting on public lands, not by going to developed shooting ranges. Recreational shooting is an appropriate use of public lands, and the public demand for dispersed recreational shooting is more than evident.</p>
2-79	<p><u>Travel Management</u></p> <p>Motorized and Non-Motorized Use Route Designations</p>		<p>The preferred Alternative C would prohibit motorized vehicle access to one of the Department's wildlife catchments within the IFNM.</p> <p>It is important that motorized access is allowed for administrative purposes for <u>ALL</u> catchment maintenance and water hauling activities.</p> <p>Catchment 730 is located in the Samaniego Hills. The Route number accessing this catchment is 2A and 2A2 (see Appendix G). Every alternative for Route number 2A and 2A2 shows the Designation Code C08.</p> <p>We request Route Numbers 2A and 2A2 be given Designation Code ML06 UserAdminMtrPermiteeMtr.</p> <p>In the body of the letter, we expressed our concerns with the way in which route designation decisions were illustrated in the draft RMP.</p> <p>To illustrate this concern, Department staff, in our efforts to determine the route designations to each wildlife water</p>

			<p>catchment, were forced to use <b>supplemental mapping software and GPS data, not available from the BLM</b>, to cross reference the online maps. As such, the Department suggests clarifying within the document to provide the level of detail necessary to understand route designation decisions within the planning area.</p>
2-79	<p><u>Travel Management</u>  General</p>	<p>“Motorized use for administrative access is allowed on a case-by-case basis provided route is not subject to improvements”</p>	<p>Add: “Regular administrative motorized access will be maintained to all wildlife water catchments to allow for <u>monitoring</u>, water hauling, maintenance, enhancement, and redevelopment activities where it currently exists. AGFD will have full motorized access to wildlife water catchments where access routes currently exist.”</p> <p>The Department does not support relegating decisions on AGFD administrative uses to a case-by-case basis (i.e. requiring an Environmental Assessment to check on or haul water to a wildlife catchment on an already established and administratively designated route). Motorized access to wildlife waters should not be determined on a case by case basis, but should be available to AGFD year-round for wildlife management purposes.</p> <p>The Department recommends that all routes leading to wildlife waters be limited to administrative use and continue to be maintained for that purpose.</p> <p>The Department was integrally involved in route designation processes for other National Monument planning efforts (Sonoran Desert, Agua Fria, AZ Strip, etc.), and was not afforded this opportunity for the IFNM. The Department has significant concerns with the lack of coordination between the Field Office and</p>

			our planning personnel in this regard.
2-97	<u>Summary Comparison of Impacts Table</u>  Public Safety		Preventing exposure to hazardous materials by banning recreational shooting is unreasonable. Prohibiting recreational shooting would not minimize risks of public safety from shooting activities. There are laws currently in place that prohibit misuse of firearms (ARS 13-1201) to address safety concerns.
4-30	<u>Impacts on Wildlife and Wildlife Habitat</u>		BLM has proposed several alternatives that may affect access to current livestock waters, possibly limiting the amount of water available in the IFNM. This may negatively affect wildlife, that use both wildlife water catchments as well as livestock waters. The Department requests that BLM provide further information in the impact analysis on how the proposed loss of livestock waters may affect wildlife populations. Drought, increased human development, and barriers to movement force many wildlife species to utilize livestock waters when other alternatives do not exist.
4-97	<u>Impacts on Recreation</u>		Potential historical, economic, and social impacts were not addressed or analyzed in Chapter 4 in regards to the decision to ban recreational shooting (Alternative C: Use and Discharge of Firearms: "Prohibit the use and discharge of firearms within the IFNM, except for permitted or authorized hunting activities conducted in accordance with AGFD hunting regulations.")  The Department recommends a more thorough analysis to encompass all impacts associated with this decision.
D-4 D-11	<u>Administrative Actions by Resource</u>  Wildlife and Wildlife Habitat		As agreed to at a coordination meeting on 11-30-07, add paragraph below to 'Wildlife and Wildlife Habitat'.  "Allow AGFD the use of motorized and mechanized equipment off designated routes in suitable locations (as agreed to by AGFD and BLM) for such purposes

Mr. Mark Lambert

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	Travel Management		<p>including, but not limited to the following: law enforcement activities, wildlife water supplementation, collar retrieval, capture and release of wildlife, telemetry, surveys, habitat evaluation, and research activities.”</p> <p>Also, the Department requests adding language in the RMP to clarify how restrictions to ‘surface disturbing activities’ will impact AGFD wildlife administrative activities and projects, otherwise many tools the Department utilizes for the management of wildlife would be open to interpretation by various and changing BLM personnel. The Department perceives this to be an impact to management authorities, and recommends clarifying this within the RMP.</p>
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THE STATE OF ARIZONA  
**GAME AND FISH DEPARTMENT**

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May 1, 2007

Ms. Elaine Zeilinski  
Arizona State Director  
Bureau of Land Management  
One North Central Avenue, Suite 800  
Phoenix, Arizona 85004-4427

Dear Director Zeilinski:

The Arizona Game and Fish Department (Department) appreciates the continued cooperation and consideration extended to the Department as a Cooperating Agency during the development of the Bureau of Land Management's (BLM) Resource Management Plans in Arizona.

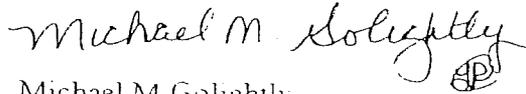
As you know, the Department is faced with wildlife management challenges of growing scope and complexity. As such, the Department continually evaluates the best management strategies for protecting wildlife resources as well as providing wildlife opportunities for the enjoyment, appreciation, and use by present and future generations of Arizonans. Through this management, the Department promotes wildlife-dependant recreation, including hunting, as an important tool for management as well as an important family-based outdoor activity. Continuing traditional hunting activities, such as recreational shooting, is essential for the public to hone skills, build expertise and accuracy, and familiarize themselves with hunting rifles, shotguns, bows, and other hunting tools. Dispersed recreational shooting also plays an important role in passing down knowledge about hunting and associated weaponry from parents to their children, building interest and ability in younger generations.

The Arizona Game and Fish Commission (Commission) has developed a resolution (attached) in response to a decision to "prohibit the use and discharge of firearms within the Ironwood Forest National Monument (IFNM)" in the IFNM Draft Resource Management Plan and Environmental Impact Statement. The Commission opposes recreational shooting restrictions on any public land in Arizona and is grateful the BLM has committed to reconsidering their preferred alternative included in their Resource Management Plans. We are hopeful that our resolution will assist the BLM in their decision-making process.

Ms. Elaine Zerlinski  
May 1, 2007  
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We look forward to your continued coordination on this issue. Please contact Josh Avey at 602-789-3605 to discuss further cooperation on this effort.

Sincerely,

Handwritten signature of Michael M. Golightly in cursive script, with a small circular stamp or mark at the end of the signature.

Michael M. Golightly  
Chairman

cc: Arizona Game and Fish Commissioners  
Duane L. Shroufe, Director  
Patrick Madigan, BLM Tucson Field Manager

Attachment

**A RESOLUTION OF THE ARIZONA GAME AND FISH COMMISSION  
CONCERNING THE  
MANAGEMENT OF TARGET SHOOTING ON THE  
IRONWOOD FOREST NATIONAL MONUMENT**

**WHEREAS**, the Federal Land Policy and Management Act of 1976 (Act) provides for the management of multiple use and sustained yield by the Secretary of Interior through the Bureau of Land Management (BLM) on lands administered by BLM, and

**WHEREAS**, the Act directs BLM to develop, maintain and, when appropriate, to revise land use plans for specific areas that use and observe the principles of multiple use and sustained yield; consider present and potential uses of the public lands; and use a systematic interdisciplinary approach to achieve integrated consideration of physical, biological, economic and other sciences, and

**WHEREAS**, on June 9, 2000 President William Jefferson Clinton designated the Ironwood Forest National Monument (IFNM) through proclamation that recognized the biological, geological and archeological resources as the primary justifications for establishment, and

**WHEREAS**, the BLM under the authority of the U.S. Department of Interior acknowledges the benefits of “providing public access to federal lands and enhancing opportunities on federal lands to fish, hunt, and engage in shooting sports activities in a safe and environmentally sound manner for the purposes of promoting marksmanship, public safety, hunter education, competition, lawful hunting, and public demonstrations” per the September 2006, Federal Lands Hunting, Fishing, and Shooting Sports Roundtable Memorandum of Understanding, and

**WHEREAS**, the BLM and other stakeholders participated in a facilitated process by the U.S. Institute for Environmental Conflict Resolution, Morris K. Udall Foundation, to identify issues associated with target shooting on public lands and develop recommendations to address current and future management of this legitimate activity, and

**WHEREAS**, based on documentation contained in BLM land use planning documents, target shooting on BLM lands is recognized as a legitimate and important recreational resource to the public, and

**WHEREAS**, the preferred alternative within the Ironwood Forest National Monument Draft Resource Management Plan/Environmental Impact Statement (RMP) prohibits recreational target shooting within the IFNM based on safety and environmental concerns, and

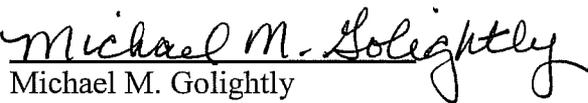
**NOW, THEREFORE, BE IT RESOLVED** that the Arizona Game and Fish Commission opposes the preferred action (IFNM Draft RMP, Decision on the Use and Discharge of Firearms/Target Shooting; Decision #13) that specifically prohibits target shooting within the Ironwood Forest National Monument, and

**BE IT FURTHER RESOLVED** that the BLM refer to the findings of the Final Report, Tucson Basin Shooting on Public Lands Workshop Project, issued June 2006, by the U.S. Institute for Environmental Conflict Resolution to develop an alternative proposed action, and

**BE IT FURTHER RESOLVED** that the BLM define dispersed recreational shooting as “any shooting that is carried out in a safe manner, does not cause resource damage, and does not result in litter.” The Commission believes that dispersed recreational shooting, as defined, is a legitimate and legal activity and requests this definition be included in the final RMP, and

**BE IT FURTHER RESOLVED** that the BLM develop a law enforcement coordination plan for the IFNM in partnership with local law enforcement agencies.

**DATED AND ADOPTED** this 1<sup>st</sup> day of May, 2007.



Michael M. Golightly

Chairman

Arizona Game and Fish Commission