

February 17, 2021

USDA Forest Service
c/o Beth Davis
5575 Cleora Road
Salida, CO 81201

RE: Douglas County Government Comments on the Integrated Management of Target Shooting on the Pike National Forest #57807 Proposed Action

The Douglas County Commissioners appreciate the opportunity to comment during the NEPA process for the Integrated Management of Target Shooting on the Pike National Forest (#57807) proposed action. Douglas County has been supportive of the USFS developing recreational shooting solutions on public land. To that end, we have dedicated staff time, equipment time, information technology and internet resources to support the Southern Shooting Partnership (SSP), shooting range engineering, law enforcement, fire mitigation and other related efforts. In continuing partnership with the USFS, Douglas County has the following comments to the proposed action currently out for public scoping.

General Comments:

- Douglas County recognizes the developing conflict between recreational user groups, resource damage from irresponsible dispersed shooting as well as the potential public safety hazards of errant rounds or wildfire. Much of this conflict is based in increasing population and participation in all recreational activity on the Pike National Forest.
- Douglas County values its citizens and visitors and strives to protect them and their property.
- Douglas County values the natural resources found within the Pike National Forest and seeks to conserve and protect them.
- Douglas County deeply values the opportunity for its residents and visitors to engage in shooting sports and to practice or train with firearms for self-defense and defense of the nation.
- The United States Forest Service has implemented the honorable multiple use philosophy for generations. Recreational shooting is a historic, legitimate and popular use of National Forest Lands.
 - In this vein, Douglas County prefers the USFS leave as much of the Pike National Forest open to dispersed shooting as is reasonably possible. Many shooters prefer this option to any other solution.
 - If the USFS restricts historic dispersed shooting opportunities, the County believes they should make sufficient provision to accommodate this activity through other means, such as the development of an adequate number of formalized shooting ranges, preferably more than one per Ranger District. We do not believe only three ranges will be sufficient to handle the current volume of

shooting, let alone the future growth. Nor will three ranges be sufficiently dispersed to provide reasonable driving times to accommodate shooters in the various Front Range communities spread from Denver to Pueblo, and from I-25 to Fairplay.

- More than three shooting range locations should be approved through this process, even if the timing of their construction may be delayed. The ability to add ranges at different locations in addition to the seven specifically described in this proposal should be authorized by the final decision.
- Adaptive management triggers could be the mechanism by which new locations are brought online. Initially approved range locations reaching or exceeding capacity, increased dispersed shooting activity or other reasonable measures would make great adaptive management triggers for approving or opening additional range locations.
- Douglas County desires to be a good partner to the USFS. Correspondingly, the County would potentially offer funding, heavy equipment time for construction of ranges, staff services such as engineering or project management, and possible partnership on long term management of formalized shooting ranges. This assistance would not be to relieve the USFS of its obligation to provide reasonable accommodation for historic recreational shooting, but rather to assist the USFS where we can and to increase the number of shooting ranges approved through this project. Population growth and the increase in popularity of shooting sports and recreational shooting is anticipated to outstrip the capacity of only three formalized ranges in short order.
- In further efforts to bring solutions to this problem, Douglas County is pursuing the development of one or more shooting ranges on non-federal lands within Douglas County to help alleviate the shooting pressure that will develop from the anticipated restriction of dispersed recreational shooting.
- As Turkey Tracks lies within Douglas County and would be a great benefit to our residents and visitors, we request that Turkey Tracks be approved as an official shooting range through this proposed action. We further request that it be designed per the specific recommendations for shooting range design & management below.

Survey Results Informing Range Design and Management:

In 2019, the Southern Shooting Partnership conducted a multi-county listening tour and public survey. There were 529 responses to this survey. Of those responses, 282 of the respondents identified themselves as recreational shooters, 98% of whom shoot on the Pike National Forest at least occasionally. There are some very important statistics that come to light from the responses of the shooters. As the major goal of designating shooting ranges through this proposed action is to funnel most of the current dispersed shooting into formalized ranges, any ranges developed should accommodate the needs and desires of the current community of dispersed shooters in order to incentivize them to switch to using these ranges.

Driving Distance: One important statistic is the distance shooters are willing to drive to use a shooting range. 100% of the responding shooters are willing to drive 30 minutes to reach a range. 65% of shooters were willing to drive an hour, but only 20% were willing to drive 90 minutes or more.

Features Wanted in a Range: SSP Listening Tour Survey results showed that rifle ranges were in highest demand, followed closely by pistol ranges. 95% of shooters want rifle, 90% want pistol and 76% want shotgun ranges or galleries. The Survey identified that there is significant desire among shooters to have rifle ranges longer than 100 yards. Two thirds of shooters agreed that 500-yard rifle range opportunities are desired, and more than half of shooters agreed that 600-yard or longer rifle range opportunities are desired. 92% of shooters wanted at least a 300-yard rifle range. However, one could imply from these numbers that 95% of the responding shooters shoot rifle, and of those the majority desire long-range shooting opportunities. 1000-yard or meter ranges are the preferred long-range rifle distance. Many rifle shooters look to public lands for long-range shooting opportunities because commercial ranges and private lands have very few long-range opportunities. Douglas County has no commercial rifle accommodations of even 100-yards.

Range Supervision: Survey results show that 77% of shooters do not want a range constructed on the national forest to be supervised by a range safety officer (RSO); 11% prefer to have an RSO present and 12% were ambivalent. When asked a different way, more shooters (68%) responded that they might be willing to use a range supervised by an RSO even though it was not their preference, but 31% indicated they would probably not.

Range Fees and Donations 50% of responding shooters were willing to pay a \$5-10-dollar daily usage fee, 31% were unwilling, and 19% were neutral on the question. 31% of shooters opposed having a donation box at national forest ranges, while 69% were supportive or ambivalent.

Situational Analysis:

In the four years that the SSP has been analyzing the recreational shooting situation on public lands, it has become clear that there are different shooter demographics. Many shooters are already using commercial or private ranges, and do not frequent the national forest for shooting opportunities. However, there is a certain demographic that enjoys shooting on the Pike National Forest. These shooters prefer the national forest or public lands for several main reasons. These reasons include: rugged individualism; shooting in a beautiful, secluded outdoor setting; wanting privacy; not wanting to be delayed by repeated shooting line closures for target servicing; and accommodations not available at commercial ranges such as long-range opportunities, being able to draw from a holster, or the ability move and shoot.

Douglas County leadership feels that with the large volume of shooting that is already occurring, the rate of population growth, the disproportionate increase in the popularity of shooting sports, and the massive uptick in first-time firearm purchases, it is more important now than at any time

in history to accommodate recreational shooting with an appropriate number of shooting ranges. While we acknowledge that not all the recreational shooting demand can or should be accommodated on national forest lands, closure of dispersed shooting that has occurred since European settlement will leave a huge void to fill.

The stated goal of approving and constructing shooting ranges on the Pike National Forest is to shift the current dispersed shooting into established ranges. These statistics are critical to understanding the shooter demographic that is currently using the Pike National Forest. Ranges will never be universally accepted by those that prefer dispersed shooting. If the Forest Service is to be successful in shifting a reasonable percentage of the existing dispersed recreational shooting to these ranges, it must make them attractive to the shooters that want to shoot on public lands, often in a dispersed fashion.

Douglas County Conclusions & Recommendations for Shooting Range Design and Management:

The vastness of the Pike National Forest (1.1 Million acres), its juxtaposition with so many Front Range cities and communities which lie as much as 100 miles apart, the sheer volume of shooting occurring on the Pike currently, the anticipated population growth and the disproportionate expansion of recreational shooting in light of these survey responses all lead us to the conclusion that three shooting ranges will not be sufficient. The reasons and recommendations are detailed in the points below.

- **Driving Distance:** Only two thirds of the surveyed shooters are willing to drive an hour to a range, but all of them will drive half an hour. Only 19% will drive 90 minutes or more. There must be multiple ranges dispersed throughout the Pike to accommodate reasonable driving distances/driving times to entice shooters out of dispersed settings and into these formalized ranges.
- **Range Capacity:** There is so much dispersed shooting activity now that it is unlikely only three shooting ranges could comfortably absorb the current level of dispersed shooting. Add to that population growth, 8 million new first-time gun owners (nationally) and increased popularity of recreational shooting, and usage will expectedly increase rapidly. It could quickly outstrip the capacity of only three ranges. Building as many galleries and lanes and accommodating as many types of shooting as possible at each range location will increase capacity and spread usage over the diversity of accommodations. Shooters will become very frustrated if they cannot get a slot in the newly created ranges or if the ranges are so busy that it diminishes the shooting experience for them.
- **Accommodation of Preferred Shooting Styles:** Providing opportunities for the types of shooting that appeal to the current dispersed shooting community will lead to more success in transitioning them to formal shooting ranges. 95% of shooter respondents wanted rifle accommodations and 90% wanted pistol. Still three quarters of the shooters would like to have shotgun opportunities. 92% of the rifle shooters want at least a 300-yard opportunity while two thirds would like a 500-yard

experience. Fully half of the rifle shooters indicated would make use of a 600+ yard range at times. 1,000-yard or meter rifle ranges are the preferred long-range distance, and we request that the 1,000-yard distance be accommodated wherever possible. That being said, even constrained range sites such as 528G will be very popular amongst pistol and small-bore rifle shooters and will disperse the cumulative shooting pressure amongst several range locations. This will increase shooter capacity and reduce crowding system-wide across the Pike.

Creating well designed and constructed ranges with sufficient capacity to accommodate a reasonable number of shooters is very likely to lure them away from dispersed shooting and into the new ranges. Having opportunities such as reactive steel silhouette targets that are fun to shoot and provide instant feedback will improve the experience, decrease the downtime for target servicing, and reduce trash as many shooters will not use paper targets and wooden backers as often. Allowing for activities such as drawing from a holster and moving while shooting is very important as many shooters prefer the dispersed option as it allows them to engage in these activities. The omni-directional, two-bay galleries proposed at some locations would be very helpful in accommodating these types of shooting activities.

- **Supervision:** Three fourths of shooter respondents indicated that they were opposed to having a range safety officer and a full third indicated that they would not use a range with an RSO. Once again, to make the transition from historic dispersed shooting to formalized ranges as attractive as possible, we suggest that at least some of the proposed ranges be unsupervised. It would be much simpler and less costly to operate unsupervised ranges. As experience at the Teller County Shooting Society Range has shown, disallowing shooting unless an RSO present results in significant downtime. We cannot expect shooters to plan their day around a trip to a national forest range and then have them arrive to a closed range for lack of an RSO. The adaptive management plan can address specific trigger points to transition to RSO supervision if that becomes necessary, but we suggest designing ranges and establishing management plans to accommodate shooters acting autonomously.
- **Fees:** Shooter statistics indicate that only half of the current shooters surveyed would be willing to pay even a nominal fee to use the range. One third are opposed to any fee. Once again, to lure the current dispersed shooter into these new ranges, we suggest they be free of charge. Two thirds of shooters supported or were ambivalent to a donation box, so we suggest having one at each formal range location. While one third of shooters answered in opposition to donation boxes, it seems unlikely that this would be a major impediment to shooter acceptance of the new ranges. Donations would help offset some of the operating costs.
- **Grading & Environmental Standards:** Douglas County recommends using existing industry standards and practices for both range design and monitoring. This would include drainage, grading, and if required, lead mobility monitoring. Adaptive management triggers should be tied to established standards rather than

being subjective. Subjective triggers are too ambiguous and can lead to inappropriate adaptive management responses. Douglas County would be willing to help determine the appropriate standards to use.

- **Reasonable Safety & Sound Mitigation Measures:** We recognize that there is no location in the Pike National Forest that is isolated from communities, houses and other uses. Accordingly, we support the use of reasonable design and engineering measures to reduce the risk of errant projectiles and noise. A balance of ensuring public safety and reducing the impact of shooting sound levels with actual risk and at a reasonable cost is preferred.
- **Perpetual Special Use Permit:** If partnerships develop around the various approved shooting range locations, it may be helpful to issue a permanent special use permit to allow the partners to perform routine maintenance and management activities. This would reduce the red tape and lead time to coordinate routine maintenance.
- **Coordination of Law Enforcement and Emergency Response:** Douglas County would appreciate the opportunity to work with the Forest Service in developing a plan for and in the coordination of law enforcement, fuels mitigation, and emergency response for the Turkey Tracks site or any other Douglas County shooting range location that may be approved.
- **Coordination of Turkey Tracks Design & Management Plan:** Douglas County would also appreciate the opportunity to participate in the design and development of a management plan for the Turkey Tracks site if it is approved as a shooting range. This location is within Douglas County. County leadership and staff have interests in this facility on multiple levels.

In summary, it will be a major social and cultural shift to close vast portions of the Pike National Forest to the dispersed shooting that has occurred there since European settlement. To increase the public acceptance of the transition to formal shooting ranges, we must accommodate the preferences of the shooters that are currently engaging in dispersed shooting. If drive times are too long, ranges are too busy, oversight is too strict or they simply are not enjoyable to use, many shooters will refuse to transition. Some may stop shooting. Others may transition to private or commercial ranges. But the demographics of the dispersed shooters on the Pike seem to indicate that many will not be happy with the private/commercial options.

We can assume that most of these shooters are responsible and ethical, but a percentage may be unaware of proper public land etiquette or simply be angry at government for restricting a long-standing opportunity. Some will simply be irresponsible or uncaring. Some of this smaller percentage will likely find expedient locations to target shoot. If we can build excellent ranges with the accommodations that the current shooters desire, keep them operating below capacity and make them accessible from most communities with a reasonable drive time, we will have a much higher compliance rate and we will earn a lot of good will amongst our residents and visitors.

The resolution of conflicts between the various recreational activities, and between local communities and shooting activities; reduction of resource damage; reduction of errant projectile risk; reduction in shooting sound levels and reduced fire danger will be beneficial outcomes of this project. Douglas County mountain community residents will be grateful. The reduction in the dispersed incidents of recreational shooting problems is anticipated to provide some relief to County deputies and Forest Service LEOs. There could also be a reduction in emergency response calls for fire, accidents and injuries. Douglas County is appreciative of these expected outcomes. This is an exceedingly complex issue; we commend the Forest Service for their broad and thoughtful approach to this proposed action.

Once again, we would like to thank the US Forest Service for their diligent work on the lengthy and challenging process that has culminated with the release of the Integrated Target Shooting Management proposal. We appreciate the opportunity to comment on the proposed actions therein. Douglas County is a willing partner and hopes to help develop mutually beneficial solutions to the concerns that led to this proposal.

Respectfully,

BOARD OF DOUGLAS COUNTY COMMISSIONERS



Abe Laydon



George Teal



Lora L. Thomas