



COLORADO

Parks and Wildlife

Department of Natural Resources

Southeast Region - Area 14
4255 Sinton Road
Colorado Springs, CO 80907
P 719.227.5200 | F 719.227.5264

February 22, 2021

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

RE: Scoping Comments concerning the Integrated Management of Target Shooting on the Pike National Forest

Dear Ms. Davis,

Colorado Parks and Wildlife (CPW) appreciates the opportunity to comment on the proposed management of target shooting on the Pike National Forest. CPW has a significant interest in the management of recreational sport shooting on public lands. CPW is statutorily charged with protecting, preserving, and enhancing wildlife, wildlife habitat, and recreational opportunities for the state's residents and visitors. Recreational sport shooting is a time honored American outdoor tradition, and its growing popularity coupled with the population growth in Colorado requires that it be more actively managed like other recreational uses allowed on Forest Service system lands.

CPW appreciates USFS working collaboratively with partners through the Southern Shooting Partnership to address this issue. CPW is supportive of the overall USFS management framework of developing shooting ranges on public lands, closing areas where recreational shooting is inappropriate or unsafe, and having an adaptive framework to allow for responding to changing future conditions.

The proposed action commits to developing one shooting range per ranger district. CPW believes that this may not be adequate to accommodate current and future need, particularly if large portions of the forest are closed to dispersed shooting. To address this concern CPW recommends that the USFS decision allows for development of additional ranges if needed, and that as much of the forest remain open to dispersed shooting as possible.

The proposed action proposes to build one range per district, but only provides one potential range location in the South Park Ranger District. The Wilkerson Pass location suggested in the proposed action is located in mapped winter range for both mule deer and elk. Additionally,



pronghorn antelope use has increased in the area. Recently the Colorado Department of Transportation has identified a section of US Highway 24 near the proposed range for wildlife crossing signage, due to the large number of automobile wildlife collisions. Lastly, there could be safety concerns with ingress and egress off of US Highway 24 into the proposed range site due to limited visibility. CPW recommends that the USFS consider the following alternative locations in the South Park Ranger District for a developed shooting range, which should have less impact on wildlife: 1. USFS 865, accessed off of Park CR#90 (38.99262, -105.42810); 2. Park CR#423 (38.96644, -105.35478); 3. USFS 296 off Park CR#211 (39.02423, -105.36592).

CPW supports first closing areas to recreational shooting that were previously closed under emergency orders. CPW agrees that areas surrounding newly developed shooting ranges should be closed only after the new ranges are developed and opened to the public. CPW supports closing areas to recreational shooting where necessary prior to the development of shooting ranges for public safety reasons, but is not supportive of closing areas to recreational shooting prior to the opening of nearby developed shooting ranges on Forest Service lands due to existing conflicts with other user groups or resource damage. Experience on the Pike National Forest and the Arapahoe and Roosevelt National Forest demonstrates that closing areas to recreational shooting without providing safe and appropriate public alternatives only moves existing problems to new areas. While the resource damage in some areas that have been heavily utilized by the shooting public is unacceptable, CPW is concerned that prematurely closing these areas prior to providing more appropriate alternatives, may result in more locations on the National Forest that ultimately require extensive rehabilitation.

CPW believes that the proposed metrics for determining which areas of the forest may no longer be suitable for dispersed shooting are too broad, and prefers as much of the forest remain open for dispersed shooting as practicable. For example, while it is never safe or legal to shoot across a public road, closing all areas within 150 yards or ¼ mile of a road would restrict recreational shooting in many areas where shooting would be a safe and appropriate activity, and may disproportionately impact disabled persons wishing to engage in dispersed shooting. CPW is concerned that large sweeping closures send the message that as a recreational activity, sport shooting is not appropriate on National Forest lands. In Colorado counties that have developed designated shooting areas and ranges such as Weld, Park, and Summit counties the sport continues without the intense conflicts between users. The large closures under the proposed action will also serve to concentrate legal dispersed shooters in a smaller area, which may increase conflicts in those areas.

CPW recommends that the adaptive framework contemplated in Table 2 and 3 of the proposed action be modified to include working with existing partners, like those in the Southern Shooting Partnership and others, and exploring and developing new partnerships to help address some of the desired conditions listed for both dispersed shooting and developed ranges. For example, in addition to funding opportunities like CPW's annual Shooting Range Development Grant, many other developed public ranges benefit from the involvement of dedicated users and volunteers.

As previously stated, CPW recommends that the proposed action allow for the creation of additional developed ranges on Forest Service lands if indicated by conditions developed in the adaptive framework.

CPW appreciates the opportunity to comment. If you have any questions or require additional information, please contact Area Wildlife Manager Frank McGee at 719-227-5218 or at frank.mcgee@state.co.us.

Sincerely,

A handwritten signature in black ink that reads "Brett Ackerman". The signature is written in a cursive, slightly slanted style.

Brett Ackerman
Southeast Regional Manager

Cc: Northeast Region file
Area 1 file
Area 5 file
Area 14 file