

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,

Pikes Peak Outdoor Recreation Alliance (PPORA) appreciates the opportunity to comment on the proposed management of target shooting on the Pike National Forest. PPORA is a collaborative of outdoor businesses, nonprofits, government entities, and individuals who recognize the value of our region's natural and recreation assets to our community both as an economic driver and for our health and well-being and the strength found in working together. PPORA's mission is to strengthen the outdoor recreation industry for the Pikes Peak region through leadership and collaboration. Outdoor recreation in natural settings is and always has been an indispensable part of conservation. Outdoor recreation is a sustainable enterprise, the third largest economic sector in the United States, and fosters human health and well-being. Our natural places and the recreational activities they provide are essential to us mentally, spiritually, physically, and economically. The outdoors is a great economic driver for the many businesses in our region as well as for tourism. When unmanaged or poorly managed, outdoor recreation, including sport shooting, can adversely affect our public lands, as well as the quality of experiences and the numerous benefits they provide.

The population growth along Colorado's front range coupled with the growing popularity of recreational sport shooting on public lands has led to resource damage, growing conflicts between other recreationists, and human safety concerns on the Pike National Forest. PPORA 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.

PPORA supports the closure and priority of areas that were previously closed under emergency orders. Closing areas to recreational shooting where necessary prior to the development of shooting ranges for public safety reasons is also reasonable, but we are 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.

As a coalition consisting of many different user groups and stakeholders, PPORA recognizes that residents and visitors of the Pikes Peak region enjoy various types of outdoor recreation and values them equally. Dispersed shooting has been an activity long enjoyed by many on forest lands over time;

and changes affecting this recreational user group should be entered into carefully and respectfully. PPORA deeply values the public's opportunity to engage in shooting sports and to practice or train with firearms for self-defense and defense of the nation. Large, sweeping closures inadvertently send the message that sport shooting is not an appropriate recreational activity on National Forest lands. We believe any significant changes including development of new ranges should accommodate the needs and desires of the current community of dispersed shooters. One demographic of Pikes National Forest shooters prefers the national forest or public lands for several reasons, including: 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. PPORA 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.

PPORA agrees with Colorado Parks and Wildlife 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, 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. Aligning with existing laws and regulations, such as regarding hunting activity and proximity to roadways and trails, would make sense for consistency and educating the public.

Lessons from historic closings of areas to recreational shooting without providing safe and desirable public alternatives only moves existing problems to new areas and may compound the problem. While the resource damage in some areas that have been heavily utilized by the shooting public is unacceptable, we are concerned that prematurely closing these areas prior to providing more appropriate and desirable alternatives may result in more locations on the National Forest that ultimately require extensive rehabilitation.

The proposed action commits to developing one shooting range per ranger district, but more than three shooting range locations should be approved through this process to better support the needs of the shooting community today and into the future, even if the timing of their construction may be delayed. In addition to building ranges, PPORA strongly encourages as much of the forest remain open to dispersed shooting as possible for the reasons shared in this letter.

Communicating the changes and educating the public will be extremely important once final measures are approved. PPORA will continue to provide information, education, and resources on the recreational user website [www.pikespeakoutdoors.org](http://www.pikespeakoutdoors.org) as well as through channels such as email and social media to serve as a partner and resource to the land managers and outdoor community of the Pikes Peak region.

Sincerely,



Becky Leinweber, Executive Director