

December 14, 2023



The Colorado Trail  
Foundation

To Whom it May Concern:

The Colorado Trail Foundation (CTF) appreciates this opportunity to comment on the revised Integrated Management of Target Shooting on the Pike National Forest Project (57807). The CTF is a 501(c)(3) non-profit corporation, with a mission to help build and maintain The Colorado Trail (CT) between Denver and Durango.

The CTF has reviewed the project documents and have the following comments regarding the proposed project:

1. The CTF recognizes that dispersed target shooting is a legal use of National Forest System lands, but also that the activity can and has had significant negative impacts on CT users specifically, as well as other forest users and natural resources. Forest rules, which include shooting in a safe manner, using only manufactured targets, and cleaning up shooting waste, reduce the impact of dispersed target shooting to some degree, but even when done according to the rules, the activity still negatively impacts other forest users with noise and safety concerns, as well as noise impacts on wildlife. In addition, not all dispersed target shooters follow the forest rules, and can result in hazards to CT users and other forest users, damage to vegetation, increased frequency of wildfires, water quality issues from spent ammunition, and trash accumulation. As discussed in the project Revised Proposed Action and Alternatives with Preliminary Analyses, these negative impacts are likely to increase in the future under current conditions (Alternative 1: No Action Alternative) due to increased popularity of target shooting, as well as population increases in the vicinity of the Pike National Forest. The CTF therefore generally supports the measures described in the proposed action as a first effort to reduce the negative impacts of target shooting on the Forest, with minor comments and suggestions described below. The CTF's comments are primarily limited to those aspects of the proposed action that impact the CT and CT users, and do not encompass the entire proposed action.
2. In general, the CTF supports the development of a minimum of one target shooting range in each of the ranger districts, as described in Alternative 2: Proposed Action. Development of shooting ranges to industry standards potentially reduces the negative impacts of dispersed target shooting by concentrating target shooting and resulting noise impacts at designated facilities, reducing user conflict and public safety hazards, collecting and recycling of lead waste, controlling site runoff, and reducing wildfire risk. These are very positive potential outcomes of the proposed action, depending on the amount of use that is diverted from dispersed target shooting to the shooting ranges. We have the following specific comments regarding the proposed target shooting ranges:
  - a. Sound attenuation measures, including orientation of the lanes or galleries, berm construction, and other physical measures, should be prioritized in the design of the



shooting ranges to the extent possible. It should be noted that it may be difficult for a person in the vicinity of a shooting range to assess the proximity and/or trajectory of shooting activities and feel unnecessarily threatened by the shooting at the shooting range(s). Attenuating the sound, as well as signage on the CT and other National Forest System Trails in the vicinity of the shooting ranges notifying trail users of the shooting facilities, would at least partially reduce these concerns.

- b. Three new shooting ranges (NSFR 553, NSFR 528.G-North, and NSFR 536) in the vicinity of the CT where it passes through the Buffalo Creek Recreation Area are being considered as part of the preferred alternative. The locations for the gun ranges under consideration are between 1 and 2 miles from the CT at various points along the trail. In addition, the existing Buffalo Creek Gun Club shooting range is only 0.2 miles from the CT and existing noise impacts are considerable for trail users when the shooting range is being used; expansion of this shooting range has also been proposed. The cumulative impacts of all of the proposed shooting ranges, as well as an expanded Buffalo Creek Gun Club shooting range, on CT users and other trail users within the Buffalo Creek Recreation Area should be analyzed and noise mitigation measures identified and implemented to minimize the impacts to the extent possible.
  - c. Expansion of the Buffalo Creek Gun Club shooting range may impact the safety of CT users. If expansion of the shooting range is approved, environmental clearances for realigning the CT, as necessary, should be included in the shooting range expansion approval. The CTF requests that the South Platte Ranger District involve CTF field staff in identifying an appropriate alignment for the trail and participation by CTF volunteers in constructing the realignment, should this be necessary.
  - d. One of the advantages of developed shooting ranges is the ability to collect and recycle lead and other metals resulting from shooting activities. Funding for this should be included in each ranger district's budget, based on the number of shooting ranges in each district.
3. The CTF strongly supports the dispersed target shooting closure criteria included in the proposed action, with the following comments and recommendations:
- a. Dispersed target shooting would be closed within  $\frac{1}{4}$  mile of "highly visible trails," although this term is not defined in the project documents; we recommend that the criteria for "highly visible trails" be identified in the analysis. Based on the width of the "Proposed Closed Shooting" corridor encompassing the CT in Figure 4 and other project maps, it appears that the CT is considered a "highly visible trail" and dispersed target shooting would not be permitted within  $\frac{1}{4}$  mile of the trail, except where private property is located within that  $\frac{1}{4}$ -mile closure distance. The CTF strongly supports the closure of dispersed target shooting within  $\frac{1}{4}$  mile of the CT to protect trail users and enhance the trail experience.
  - b. It is not clear why the closure distance from other National Forest System Trails is only 150 feet, when the same safety issues affect users of those trails as users of "highly visible trails." We recommend reconsideration of this reduced closure distance and consideration of a uniform closure distance of  $\frac{1}{4}$  mile from all National Forest System Trails. This would provide the same level of protection for all trail users, as well as a consistent closure distance that doesn't vary according to the trail, making it less confusing for dispersed target shooters.
  - c. Closure to dispersed target shooting within wilderness areas appears to be limited to trail corridor buffers, including the CT. The nature of target shooting, with associated loud noise and sometimes rapid fire, would seem to make it incompatible with the nature and purpose of wilderness areas, although it is likely that few target shooters

venture into wilderness areas for that purpose. Regardless, the CTF recommends consideration of closing wilderness areas within the project area to dispersed target shooting.

- d. Signage with maps, as well as website information, will be critical in raising awareness of dispersed target shooting closures on the forest. Because linear features have different closure offsets, greater clarity may be achieved by using different colors for the different closure distances on maps.
  - e. Education, patrolling, and enforcement of closure areas, as well as ensuring that dispersed target shooting (where allowed) is following forest rules, will be critical in achieving the goals of the proposed action. Sufficient funding for law enforcement personnel will be necessary to accomplish this.
4. The CTF also supports the proposed action adaptive management framework to determine if desired conditions are being met across the forest, and if not, what additional action(s) should be taken to ensure the desired conditions are achieved. The proposed action would therefore not be a static project implementation, but an ongoing, monitored, and changing, as necessary, management of the forest.
  5. Alternative 3: Reduced Closure Areas does not have a significant impact on the CT, given that the same closure distance of ¼ mile appears to be the closure criteria in both Alternatives 2 and 3 – the CTF again supports this level of protection of trail users and enhancement of the trail experience. Having more forest land open to dispersed target shooting on the eastern portion of the forest and closer urban access might reduce the amount of dispersed target shooting on the western portion of the forest, which would benefit CT users because the majority of the CT is located in the western portion of the forest. From the CTF’s perspective, this would be beneficial.

Within this alternative, though, the CTF recommends closure of dispersed target shooting within the Buffalo Creek Recreation Area. Dispersed target shooting does not seem appropriate within this area, with its relatively dense network of high-use nonmotorized trails, together with the number of nearby potential shooting ranges under consideration.

All other CTF comments related to Alternative 2 discussed in this letter are also applicable to Alternative 3.

In summary, the CTF supports Alternative 3 if the Buffalo Creek Recreation Area is closed to dispersed target shooting, with consideration of all comments related to Alternative 2. If the Buffalo Creek Recreation Area is to remain open to dispersed target shooting under Alternative 3, the CTF supports Alternative 2, with consideration of all related comments in this letter.

Please contact the CTF if you have any questions regarding these comments. Again, we appreciate the opportunity to comment on this project.

Sincerely,



Tisha McCombs  
Executive Director