USDA Forest Service Jennifer DeWoody 601 South Weber Street Colorado Springs, CO 80903



RE: Proposed Action Comments - Integrated Management of Target Shooting on Pike National Forest

Dear Ms. DeWoody,

Pikes Peak Outdoor Recreation Alliance (PPORA) appreciates the opportunity to comment on the proposed management of target shooting on the Pike National Forest, as we did on the scoping two years ago. 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. 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.

In 2021 PPORA was selected as a Colorado Outdoor Regional Partner to focus on identifying and advancing conservation and recreation priorities for the Pikes Peak region to plan for the future. Through this process, we've seen some common themes arise such as the value of protecting the natural environment as well as enhancing recreational opportunities. Significantly, one other key theme was focused on management. 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 alternatives in the proposed action address some management measures – potential closures and the possible building of shooting ranges – but nowhere did I see a specific proposal or plan for increasing the number of law enforcement personnel, or even rangers to provide education regarding changes to where it will be lawful to shoot. Without this, any action will not be effective. In the Pikes Peak Ranger District, we were thrilled to go from one enforcement officer to two – still woefully insufficient for the number of recreators enjoying the forest and the sheer number of acres to patrol. When the agency closes more areas for a type of recreational use, both education and enforcement need to be significantly increased for people to understand and abide by the change. Simply building a range will not make them magically go to that range to shoot. And to that point, one new shooting range per district is way too few to support the needs of the shooting community today and into the future, even if the timing of their construction may be delayed. Although it states in the proposal that it is not the responsibility of the USFS to provide for all the needs of one recreation user group because the agency is a multiple use agency, the fact that USFS action would remove significant acreage available to that user group would, in our opinion, put the responsibility on the agency to replace that access thoughtfully and with recreational shooters at the table informing the process.

Three alternatives were presented for public comment. PPORA supports Alternative 3 which would permanently close areas at greatest risk that were previously closed under emergency orders, close additional areas that meet the criteria noted, and prioritize the building of at least one shooting range per district. This alternative, as any other, MUST include increased education and enforcement! It allows

opportunity to monitor and see whether it is enough to improve public safety and minimize the other impacts before fully closing down the Pikes Peak Ranger District and nearly 70% of the entire Pike National Forest to disbursed target shooting (proposed action Alternative 2). Great care should be taken and caution should be exercised to ensure that action is not an overreach that adversely affects the public – most of whom are law-abiding.

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.

As noted earlier, 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 <a href="https://www.pikespeakoutdoors.org">www.pikespeakoutdoors.org</a> 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

Pikes Peak Outdoor Recreation Alliance