



COLORADO

Parks and Wildlife

Department of Natural Resources
Colorado Parks and Wildlife Headquarters
6060 Broadway
Denver CO 80216
P 303.297.1192

December 28, 2023

Jason D. Robertson
Acting Forest and Grasslands Supervisor
2840 Kachina Drive
Pueblo, CO 81008

Re: Integrated Management of Target Shooting on the Pike National Forest

Dear Mr. Robertson,

Thank you for the opportunity to comment on the revised Integrated Management of Target Shooting (IMTS) on the Pike National Forest Project. Colorado Parks and Wildlife (CPW) recognizes the need for a comprehensive plan addressing increased demands for recreational shooting along Colorado's Front Range due to the growing human population. CPW has participated as an active member of the Southern Shooting Partnership (SSP) since its inception in December of 2015. We support the development of shooting ranges to reduce risks to public safety, reduce user conflicts, and to improve the experience for recreational target shooters. Further, CPW has a statutory responsibility to manage all wildlife species in Colorado; as such, we encourage protection for Colorado's wildlife species and habitats through responsible planning, which includes planning for recreational shooting on public lands. Colorado Parks and Wildlife (CPW) has reviewed the three alternatives presented in ITMS and has the following comments.

CPW supports the recommendation to develop at least three shooting ranges, including one in each Ranger district, with the potential to add more shooting ranges as funding becomes available. CPW recommends that the shooting ranges be designed to industry standards for safety, provide opportunities for various firearms, various shooting distances, various types of recreational shooting, and allow for lead collection and abatement. CPW also encourages facilities to be designed at these locations to reduce the environmental impact of all human waste. CPW recommends that no closures go into effect until developed shooting ranges are completed. CPW also recommends the implementation of Individual Management Plans at each developed shooting range.

Jeff Davis, Director, Colorado Parks and Wildlife
Parks and Wildlife Commission: Dallas May, Chair · Richard Reading, Vice-Chair · Karen Bailey, Secretary · Jessica Beaulieu
Marie Haskett · Jack Murphy · Gabriel Otero · Duke Phillips, IV · Gary T. Skiba · James Jay Tutchton · Eden Vardy



CPW supports an adaptive management model for the IMTS. However, CPW recommends that partners are involved in any decisions to increase restrictions, regulations, change management of individual ranges, or closure of any shooting range. Factors to be considered should include, but are not limited to, human health and safety, severity, frequency, natural resource impacts and impact to other areas. Accidents and criminal activity may occur at these locations. However, with proper management, these issues can be reduced or eliminated. This will result in a safer experience for other users of the Pike National Forest and will cause less impact to wildlife. Full closure of any range should be a last option as this will displace recreational shooters, likely creating more risk of injury, damage, vandalism or negative impacts to wildlife.

CPW prefers Alternative 3: Reduced Closure Areas. This alternative provides the best balance between the full closure of dispersed shooting in the Pikes Peak Ranger District presented in Alternative 2 and the No Action Alternative.

Recreational shooting is valued by citizens in El Paso, Douglas, Jefferson, Fremont, Park and Teller counties. CPW believes recreational shooters in these counties should retain the opportunity for limited dispersed shooting. We are concerned that the full closure proposed in Alternative 2 would not be enforceable and would inadvertently lead to impacts to wildlife and their habitat.

The demand is high for recreational shooting in these areas. CPW believes that adding one range to each district with a total closure to the rest of the Forest Service lands in the Pike National Forest would create a supply and demand issue. This would likely result in increased disturbance of other lands previously not disturbed by recreational shooting.

CPW recommends removing the buffer to shoot within 150 yards of a Forest Service Road within Alternative 3. There are already laws in place in Colorado that provide for human health and safety. Colorado Revised Statutes 33-6-126 restricts people from shooting from, upon or across any public road. There are already federal laws in place for safety, as well. Recreational shooters often have lots of equipment with them. Forcing shooters away from areas of easy access could restrict shooters with disabilities, and would not be equitable for all. It would also lead to more impacts to wildlife by having people go farther from roads.

CPW recommends dropping the requirement of only lead-free ammunition. Lead-free ammunition is not widely available and is much more expensive than ammunition containing lead. This expense would not be equitable for all recreational shooters. Additionally, this regulation would be challenging to enforce on shooting ranges that are not supervised. Individual Management Plans for each shooting range could address lead management.

CPW recommends using the term "firearm" in the place of "weapon" throughout the management plan. Not only will this help with the cohesive messaging of the IMTS, but it will also avoid the negative stigma associated with the word "weapon," which is defined in

dictionaries as any device used to inflict physical damage, harm or kill. Firearms are a tool used by hundreds of thousands of responsible recreationalists each year.

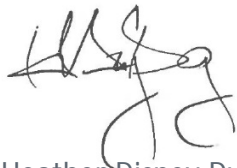
CPW will continue to pursue new shooting range developments within the counties listed in the IMTS and will continue to partner with the USFS on this challenge. CPW currently provides grant opportunities through the Shooting Range Development Program (SRDG) to help establish and maintain shooting ranges in the state. In 2019, the Pike National Forest received a grant through the SRDG for a feasibility study of implementing developed shooting ranges on the Pike National Forest for \$89,000, of which \$49,633 was used. Also, through the SRDG several ranges have received funding throughout the IMTS to include Pikes Peak Gun Club, Teller County Shooting Society, Cheyenne Mountain Shooting Complex and many more. Last year, \$909,987 was awarded to seven ranges across the state, with five of them being on the Front Range and three of them within the IMTS, totaling \$507,500. Specifically, Turkey Tracks was awarded \$300,000 by CPW.

CPW recommends the Turkey Tracks site in Douglas County be the priority due to its location and volume of use. CPW believes that the development of a proper range at this location would encourage the public to utilize the developed facility and discourage dispersed shooting along surrounding Forest Service roads. The development of the range at this location will contain activity leading to a safer experience for recreational shooters.

CPW recommends the removal of NFSR 704 (Wilkerson Pass) site from consideration. This location has been identified as year round habitat for mule deer, pronghorn antelope and elk, as well as winter concentration areas for deer and elk.

Thank you for your consideration and review of our suggestions concerning this proposal. Please feel free to contact Tim Kroening, should you have any questions or require additional information at 719-227-5218, or via email at tim.kroening@state.co.us.

Sincerely,



Heather Disney Dugan
Deputy Director
Colorado Parks and Wildlife
CC:

- NE regional files
- SE regional files
- Area 1 files
- Area 5 files
- Area 14 files