



**ROCKY MOUNTAIN
ELK FOUNDATION**

August 29, 2024

Ryan Nehl, c/o Jennifer DeWoody, IDT Lead, Target Shooting Project
USDA Forest Service
601 South Weber St.
Colorado Springs, CO 80903

RE: Integrated Management of Target Shooting on the Pike National Forest #57807

The mission of the Rocky Mountain Elk Foundation (RMEF) is to ensure the future of elk, other wildlife, their habitat and our hunting heritage. We represent more than 200,000 members nationwide, many of whom live and/or recreate in Colorado. Since its inception in 1984, RMEF has conserved or enhanced more than 8.9 million acres of North America's most vital habitat for elk and other wildlife. In partnership with the U.S. Forest Service (USFS), RMEF has conserved or enhanced more than 3.8 million acres across USFS-administered lands and opened or improved public access to over 363,000 acres. Together, the combined value of RMEF-USFS cooperative efforts totals more than \$388 million. RMEF has also participated in the Hunting & Shooting Sports Roundtable in cooperation with the Forest Service and other federal land management agencies in implementation of the Target Practice & Marksmanship Training Support Act and the John D. Dingell Jr. Conservation, Management, & Recreation Act.

RMEF appreciates the opportunity to comment on the draft environmental assessment for the Integrated Management of Target Shooting on the Pike National Forest. RMEF supports the multi-use nature of Forest Service lands and the opportunity for recreational target shooting. Access to places where hunters and recreational shooters can practice is important for the skill development required of ethical hunting, and recreational shooting contributes to wildlife conservation funding through the Pittman-Robertson excise taxes paid on ammunition and firearms. While RMEF is generally skeptical of efforts to restrict dispersed shooting opportunities on federal lands, providing developed ranges that can enhance safety while meeting the demand of the local shooting public is an acceptable alternative.

RMEF supports the recommendation to develop at least three shooting ranges, including one in each Ranger District, with the potential to add more shooting ranges to meet future demand. However, after reviewing the information about the nine potential sites, we do not support inclusion of NFSR 704 – Wilkerson Pass site because it has been identified by State of Colorado wildlife officials as year-round habitat for mule deer, bighorn sheep, and elk. It also serves as a winter concentration area for deer and elk and is a migration corridor for pronghorn.

RMEF prefers Alternative 3: Minimum Action. This alternative provides more balance between closure and dispersed shooting and is more in alignment with the objectives of Title IV of the John D. Dingell Jr. Conservation, Management, & Recreation Act (Public Law 116-9). It is still very concerning that 59% of the Forest would be closed to dispersed shooting under Alternative 3, but this is preferable to the 72% closure in Alternative 2. No closures should occur until the developed ranges are operational.

RMEF appreciates your consideration of these comments and looks forward to working with the USFS going forward.

Sincerely,

A handwritten signature in black ink that reads "Ryan Bronson". The signature is written in a cursive, flowing style.

Ryan Bronson
Director of Government Affairs