

COMMENTS ON PLAN AMENDMENT FOR A-R NATIONAL FORESTS

May 29, 2015

Arapaho and Roosevelt National Forests and Pawnee National Grassland
2150 Centre Ave
Building E
Fort Collins, Colorado 80526

Dear National Forest Planning Staff:

The undersigned organizations have a long-standing and vested interest in access and opportunities on Federal public lands for our members to enjoy hunting and recreational shooting. This vested interest led our organizations to sign a memorandum of understanding (MOU) in 2006 with the U.S. Forest Service (USFS). The Federal Lands Hunting, Fishing and Shooting Sports Roundtable (Roundtable) MOU was renewed in 2014. The purpose of the MOU is to build a partnership with the signatory organizations, the USFS, and the other signatory Federal agencies “for planning and implementing mutually beneficial projects and activities related to hunting, fishing, and shooting sports conducted on federal lands.”

The Arapaho and Roosevelt National Forests’ (ARNF) announcement of a possible plan amendment to address recreational shooting is of particular importance to us because it has the potential to improve the quality of the recreational experience if areas are identified for dispersed shooting and shooting in designated areas is managed to accommodate the activity. Our organizations have requested many times over the years that recreational shooting be managed as other activities like camping and hiking so that recreational use conflict is reduced, and shooting can be conducted in safe and accessible environments where there are natural or manmade back stops. Further, we have also advocated for the construction of unsupervised “micro” ranges that would feature modest improvements like target holders and shooting benches.

We find it surprising that the announcement did not provide any background as to the Northern Front Range Recreational Sport Shooting Partnership (Partnership) that was formed in early 2013 to address recreational shooting along the Front Range. Specifically, the announcement did not identify Partnership members or recognize the Partnership’s role in serving as the impetus for initiating the public scoping process and anticipated land use plan amendments. Additionally, there is no mention of the virtual meeting held on April 13th and how it informed the management direction the USFS is considering as outlined in the May 4th press release. Based on the information provided in the press release, it is as if the ARNF is addressing recreational shooting on Forest Service lands through the scoping process independent of the Partnership.

We are also encouraged by the USFS’s recognition of recreational shooting’s continuing growth in popularity. Where much of the land in western states, including north central Colorado, is managed by Federal agencies, it plays a key role in providing access and opportunity for people to participate in recreational shooting. We fully agree that encroaching development and the increase in recreational

participation requires a thoughtful, balanced and fair treatment of recreational shooting as a traditional and legitimate activity to be managed into the future. We have witnessed too often that closure to recreational shooting is the Federal response when land managers are faced with the need to proactively manage for recreational shooting within the mix of other recreational activities.

With this in mind, we believe all public land stakeholders would benefit from a thorough analysis of the shooting access needed to maintain adequate shooting opportunities on Forest Service land in the planning area, both now and in the future. Without first understanding the volume of shooting that is currently taking place on the ARNF, we fear that it will be incredibly difficult to develop management alternatives that will effectively address the existing issues that have prompted the USFS to initiate the land use plan amendment process in the first place. Should the USFS choose to evaluate recreational shooting on the ARNF haphazardly and without a clear understanding of the potentially affected parties, we are concerned that any subsequent management actions initiated through the planning process could simply direct problems elsewhere, likely to adjacent public lands.

We would encourage the planning staff to identify and designate those areas that have been traditionally popular for shooting. If a popular site has safety issues associated with it, we recommend that the first response be to determine if safety features, like the installation of berms, can provide the solution. Through the Roundtable, the USFS has access to expertise in the field of siting and developing shooting ranges at every scale and we would be pleased to work with USFS in providing expertise to examine existing and proposed shooting sites to see which ones would best serve the shooting public and recreational interests in general.

We also believe it is critical that the impacts of closing existing recreational shooting areas be examined to determine how the proposed closures would affect the ability of the USFS to provide for the recreational needs of shooters (and hunters who shoot); what the impact would be on sites remaining open when displaced shooters move into those areas; and, whether those areas can accommodate an increase in the number of shooters. Again, we have all too often seen Federal lands closed to shooting in management plans with no apparent thought given to how those closures will impact the shooters who use those areas, as well as the impact of increased volume elsewhere on Federal lands or surrounding state, county or private lands that may be open to recreational shooting. We expressed these and other concerns in a letter addressed to USFS Chief Tidwell in the attached letter dated July 28, 2014 and we request that it be included with this comment letter in the public scoping record.

We also encourage the inclusion of the Respected Access is Open Access outdoor ethics education outreach campaign in any plan amendment. The campaign was launched by the Roundtable in 2009 with the full support of the USFS. The campaign is designed to assist land managers in addressing issues that can arise with recreational shooting (as well as with other recreational activities). The Roundtable partnered with Tread Lightly! to manage that campaign. We have already expressed our concerns through the USFS Roundtable representative to the Partnership over the absence of even a mention of the campaign in the materials prepared by the Partnership relative to recreational shooting. The Roundtable is trying to promote a consistent and visible message to shooters that promotes good stewardship of the lands and safe shooting. This would be an important element in the USFS's management direction for recreational shooting.

In a letter dated August 20, 2014 (attached), USFS Chief Tidwell encouraged all Regional Foresters, Station Directors and Area Directors to manage recreational shooting through a collaborative approach intended to "facilitate safe and responsible use for this recreational activity." In his letter, Chief Tidwell

also noted that Roundtable and Tread Lightly!'s Respected Access is Open Access campaign are "key resources" available to the USFS as they seek to address issues associated with recreational shooting on forest land. As the ARNF conducts its evaluation of recreational shooting and plans for subsequent management of the activity throughout the planning area, we encourage planning staff to utilize these key resources, as suggested by agency leadership.

In addition to receiving comments from the public, we strongly recommend that open houses be scheduled. Open houses would assist the USFS in gathering on-the-ground information from the affected public, shooters as well as other recreationists. Maps should be made available to better understand the location of the areas currently used by shooters, areas where USFS has concerns (i.e. residential development), and areas that could be identified or designated for recreational shooting.

We appreciate the opportunity to comment during the scoping phase and are open to any thoughts on how we and the community of shooters and hunters we represent can best help the USFS develop goals, objectives and desired conditions for recreational shooting.

Sincerely,

Archery Trade Association
Association of Fish and Wildlife Agencies
Boone and Crockett Club
Campfire Club of America
Catch-A-Dream Foundation
Congressional Sportsmen's Foundation
Council for the Advancement of Hunting and the Shooting Sports
Dallas Safari Club
Delta Waterfowl Foundation
Houston Safari Club
International Hunter Education Association - USA
Masters of Foxhounds Association
Mule Deer Foundation
National Rifle Association
National Shooting Sports Foundation
National Trappers Association
National Wild Turkey Federation
North American Bear Foundation
Orion – The Hunter's Institute
Pheasants Forever
Quail Forever
Quality Deer Management Association
Rocky Mountain Elk Foundation
Ruffed Grouse Society
Safari Club International
Theodore Roosevelt Conservation Partnership
Tread Lightly! Inc.
U.S. Sportsmen's Alliance
Whitetails Unlimited
Wildlife Forever

Wildlife Management Institute
Wild Sheep Foundation

Cc

Tom Tidwell, Chief of the U.S. Forest Service

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Tom Donnelly, Larimer County Commissioner

Deb Gardner, Boulder County Commissioner

Tom Hayden, Clear Creek County Commissioner

Gail Watson, Gilpin County Commissioner