



December 19, 2020

Monte Williams, ARNF Supervisor
2150 Centre Avenue, Building E
Fort Collins, CO 80526

Re: Emergency Closure for Illegal and Unsafe Recreational Sport Shooting Near Crystal Lakes

Dear Mr. Williams:

We represent 1,566 property owners in the Crystal Lakes Road & Recreation Association (CLRRA) located in Red Feather Lakes, Colorado. We are writing today to request an emergency closure for the illegal and unsafe Recreational Sport Shooting (RSS) that is occurring near the Crystal Lakes subdivision (see attached map). These two areas have been identified as unsuitable for dispersed RSS in your Decision Notice dated June 13, 2019. The first area is North of Deadman Road to South of Filings 9 and 14. The second area is North of Filing 9 on Tiny Bob Road to South of Filing 7. Immediate action on your part is needed for the following reasons:

1. **Public Safety.** Our property owners are routinely subjected to bullets passing by their heads or lodging in their homes. According to your Decision Notice, the purpose of the project is to protect public safety. The illegal and unsafe shooting has precipitously intensified in recent years and it is only a matter of time before one of our property owners is killed or seriously injured by a stray bullet.
2. **Forest Order.** Crystal Lakes is in Northern Larimer County and our county was not required to build a public shooting range according to your Decision Notice. In fact, because there are many opportunities available for recreational sport shooting and relatively few areas were identified as unsuitable, those areas may be closed to recreational sport shooting via a forest order without the need for a public shooting range.
3. **Faith and Confidence.** Our property owners have already waited five years since the creation of the Working Agreement for the Forest Plan Amendment for RSS Environmental Assessment. They are losing faith in your ability to protect them and making them wait several more years for new public ranges to open in the other counties further erodes their confidence.
4. **Unacceptable Delay.** We previously wrote to you on August 30, 2017 to express our serious concerns about the illegal and unsafe shooting near our subdivision. Our letter resulted in a meeting with the District Ranger (Katie Donahue) on October 2, 2017 where she explained that education was the preferred management action. She promised to install education signs and maps informing shooters that there are limited safe and legal shooting opportunities in the area. Three years and several reminders later, she finally installed the signs in October 2020 during the Cameron Peak Fire. This unacceptable delay gives the impression that USFS is trying to reset the clock for the



Crystal Lakes Road and Recreation Association

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educational response to October 2020 when it clearly started in October 2017 when we made you aware of the problem.

5. **Adaptive Management Strategy.** Our property owners have provided several years of data along with detailed maps showing where the illegal and unsafe shooting is occurring. According to the Environmental Assessment, management actions may be implemented operationally or through a Forest Service forest order without further analysis in an effort to retain or return to the proposed forest-wide goal for RSS management. Crystal Lakes clearly meets or exceeds all the indicators and thresholds to warrant an emergency closure (e.g. dispersed shooting site, residential development, safety issue, developed recreation sites, conflicts).
6. **Review of Conditions.** Per the Environmental Assessment, the adaptive management strategy is incumbent on a comprehensive multi-stakeholder review of conditions on the ground at specific areas of concerns. We actively participated in a site visit on November 5, 2020 with several key stakeholders including Commissioner Kefalas and representatives from USFS, LCSO, CPW, DNR, and CLRRRA. There was no question that these areas are unsafe for RSS (e.g. less than 150 yards from residences, lack of safe backstops, use of alcohol/drugs while shooting, exposing property owners to injury or damage). However, rather than issue an immediate forest order, the response from the District Ranger was that USFS would continue to monitor the educational response for the Deadman Road area and reevaluate in the summer and install barriers for the Tiny Bob Road area in the spring.
7. **Enforcement.** The reluctance to close these two unsafe areas seems to revolve around enforcement. This could be solved by entering into a cooperative enforcement agreement with the Larimer County Sheriff's Office, an agreement that will further strengthen the partnership between the two organizations.

For these reasons, we respectfully request that you issue an emergency closure for the illegal and unsafe RSS that is occurring near the Crystal Lakes subdivision. Given the severity of the near misses and close calls that have been reported, it is unconscionable to wait any longer. If you have any questions, please contact me at clrrapresident@crystal-lakes.org.

Sincerely,
For the CLRRRA Board of Directors

Bryon Fessler

Bryon Fessler
CLRRRA President

Cc: Commissioner Kefalas, Larimer County Sheriff, District Ranger

Attachment
Crystal Lakes Map

Recreational Sport Shooting Management Final Decision Web Map

Legend Details Basemaps Bookmarks Measure Share Layers Print

Existing Shooting Closures

Unsuitable for Recreational Sport Shooting

National Forest System Lands

USDA FOREST SERVICE

County Boundary

Administrative Forest Boundaries

Administrative Forest Boundary - Arapaho and Roosevelt National Forests

