

My name is Patrick McKay. I am the Vice President of Colorado Offroad Trail Defenders and an Advisory Board Member of Colorado Offroad Enterprise. While the primary interest of both organizations is to preserve opportunities for motorized recreation on public lands in Colorado, there is considerable crossover between off-road vehicle enthusiasts and target shooters and gun enthusiasts. Many people like to combine off-roading trips with recreational target shooting on National Forest lands in Colorado. When practiced responsibly, recreational target shooting can be a safe and enjoyable activity that should be regarded as a legitimate activity on Forest Service lands and not overly restricted or prohibited altogether.

Here are my initial comments:

1. Please provide shapefiles and more detailed maps on the project website of the proposed prohibited shooting areas. The map provided is way too zoomed out and low detail to be useful. It is impossible to match the prohibited shooting areas with any topographical features. Nor does it show where these areas are in relation to Forest Service roads and trails. This effectively precludes any meaningful public comment on the proposed areas where shooting will be prohibited, as the public cannot determine where they are with sufficient precision to understand what locations are affected. At minimum the Forest should have provided detailed PDF maps for each ranger district, with at least the same level of detail as the Forest's Motor Vehicle Use Maps.

It would be ideal if the Forest could provide an interactive ArcGIS map as well as shapefiles which could be imported into Google Earth and other GIS applications. With the GIS software available to the Forest Service today, there is no excuse for failing to provide clearly legible maps for projects such as this. Consider this a standing request for the Forest to provide interactive ArcGIS maps and shapefiles in this and every future NEPA process. If such maps and GIS data are not provided, the Forest will be in violation of NEPA and the APA because it did provide sufficient information to allow effective public comments.

2. Along the same lines as #1, it is crucial that areas where shooting is prohibited are clearly defined, visibly marked on the ground, and clearly mapped with sufficient detail for the public to be able to easily understand where shooting is allowed and where it is not. The Forest should make georeferenced maps available to the public through an app like Avenza, similar to what it does with Motor Vehicle Use Maps. These maps should be sufficiently detailed so that Forest users can easily see from their GPS location on the map if they are in an area where shooting is allowed or not.
3. Please clarify if the proposed restrictions also apply to archery or just to firearms. Because archery equipment has considerably less power and arrows do not travel near as far as bullets, they do not pose anywhere near the same public safety risk. Nor does archery produce any noise which could disturb other Forest users. Accordingly, I do not believe any restrictions on archery are justified at this time. The proposed rule should contain clear language stating that it only applies to firearms and does not apply to archery, slingshots, and similar devices.

4. Please clarify if this project will involve any motorized travel management decisions. Right off the bat, I am seeing two glaring contradictions between the proposed shooting areas and the recent decision in the PSI MVUM Analysis process.
- One of the proposed shooting ranges is off NFSR 372 (Pikes Peak District), which under the draft decision for the travel management process is being closed to the public and converted to a special use permit road. This road would have to be reopened to public use in order to establish a shooting range there.
  - Another shooting range is proposed off of NFSR 376.A (Pikes Peak District), which the scoping document incorrectly states is closed. This road is open now, and the draft ROD for the travel management process converts it to a trail open to all vehicles. The proposed design of this shooting range looks like one of the ranges would be directly on the open motorized trail, and thus appears incompatible with the trail remaining open. This route is a highly important motorized trail which provides the sole motorized access to the scenic Bull Park area south of Pikes Peak. It should not under any circumstances be closed.

Does the Forest plan to make any travel management decisions with respect to these two roads (or any other roads) as part of the target shooting management project? While motorized recreationists would support reopening NFSR 372 (and we have filed a pending objection regarding the closure of that road), we would strongly object to closing NFSR 376.A after the travel management decision just determined that it should remain open to motorized use. If the Forest is proposing to make any travel management decisions in this process which would result in either opening or closing roads to motorized use, that should be clearly disclosed to the public, and such decisions must be made in accordance with the Travel Management Rule.

While I support the concept of creating designated shooting ranges in the Forest, the motorized community would strongly oppose any actions under this proposal which would result in further closure of motorized routes. Several of the proposed shooting ranges are close to open Forest Service roads and motorized trails, and they should be designed such that they are fully compatible with continued use of nearby roads. If a road needs to be slightly re-routed to go around a shooting range, that is fine. But under no circumstances should an existing motorized route be closed to public use in order to accommodate one of the new shooting ranges.

Thank you for consideration of these initial comments. I am unable to provide any comments regarding specific areas at this time due to the insufficiently detailed maps provided. I hope this problem will be rectified promptly.

Sincerely,

Patrick McKay, Esq.  
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Advisory Board Member, Colorado Offroad Enterprise