REGION 8
DENVER, CO 80202

September 4, 2024

Ref: 8EJC-NE

Ryan Nehl, Forest and Grassland Supervisor
c/o Jennifer DeWoody, NEPA Planner, IDT Lead
Pike and San Isabel National Forests and
Cimarron and Comanche National Grasslands
601 S. Weber Street
Colorado Springs, Colorado 80903
Submitted via USFS online comment portal

Dear Supervisor Nehl:

The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Department of Agriculture Forest Service August 2024 Draft Environmental Assessment (EA) for the Integrated Management of Target Shooting on the Pike National Forest located in central Colorado. We offer the following comments consistent with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The Draft EA discusses the need to provide opportunities for target shooting on National Forest Service lands while also identifying and closing areas that are unsuitable for dispersed target shooting due to resource damage, shooting-related wildfires, public safety concerns, and other user conflicts. The EA evaluates the potential environmental effects of three alternatives: 1) the No Action Alternative; 2) the Proposed Action Alternative that would identify and close unsuitable areas, develop at least one shooting range on each ranger district (i.e., a minimum of three with nine sites identified), and defines a condition-based adaptive management framework that includes management activities based on pre- and post-project implementation monitoring requirements; and 3) the Minimum Action Alternative that is based on Alternative 2 (the Proposed Action) but would have a greater amount of area open to dispersed target shooting. Alternative 3 uses the same criteria as described in Alternative 2 to identify areas that are determined inappropriate for dispersed target shooting except for two criteria. As a result, areas within 150 yards of intermittent streams were not included in the GIS model for identifying these inappropriate areas in Alternative 3. We note that the proximity of perennial streams is included in the modeling for both Alternative 3 and Alternative 2 in determining dispersed target shooting sites.

The EPA provided scoping comments for this project on February 18, 2021, that focused on potential lead-related impacts on environmental resources including water resources. We also recommended

that the EA analysis include information on a lead management plan and pointed to EPA-developed recommendations to help prevent lead-related impacts at shooting ranges through stormwater management, preventing migration to groundwater, and managing the lead itself. We note that the Draft EA analyzes lead impacts, discusses lead management plans for lead containment and migration control methods, and uses many data sources and reference documents to support the Draft EA analysis, including the EPA document our scoping comments recommended. For example, the Draft EA explains that the standards and guidelines for the soil and water analysis as well as best management practices were pulled from the Best Management Practices for Lead at Outdoor Shooting Ranges.[1] We recognize that potential lead-related impacts are a key focus area of the Forest for this project.

The EPA's scoping comments also stated that locating shooting ranges away from surface water and shallow groundwater resources is an important first step to prevent lead from impacting these resources. As noted above, Alternative 3 does not include the 150-yard boundary for intermittent streams when determining areas that would be inappropriate for dispersed target shooting. Although intermittent streams flow seasonally, they are critical to the health of watersheds by providing many of the same ecological and hydrological functions and values as perennial streams. Intermittent streams in arid and semi-arid regions can have a significant effect on the chemical, physical, and biological integrity of downstream waters.[2] The Draft EA states on page 81 that because intermittent streams were not taken into consideration for locating dispersed target shooting areas, the risk for potential erosion and lead migration to surface water, groundwater, soils with high permeability, state-listed impaired waters, floodplains, and municipal watersheds would be higher than the risks from Alternative 2. The EPA agrees that the potential for impacts to water resources increases under Alternative 3 and supports the more environmentally protective measures included under Alternative 2, the Proposed Action.

We appreciate the opportunity to participate in the review of this project and these comments are intended to facilitate the decision-making process. If we may provide further explanation of our comments, please contact me at (303) 312-6155 or mccoy.melissa@epa.gov, or Melanie Wasco of my staff at (303) 312-6540 or wasco.melanie@epa.gov.

Sincerely,

MELISSA MCCOY

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Melissa W. McCoy, Ph.D., J.D.
Manager, NEPA Branch
Environmental Justice, Community Health, and Environmental Review Division

[1] *See* https://www.epa.gov/lead/best-management-practices-lead-outdoor-shooting-ranges.

[2] *See* Levick, L., J. Fonseca, D. Goodrich, M. Hernandez, D. Semmens, J. Stromberg, R. Leidy, M. Scianni, D. P. Guertin, M. Tluczek, and W. Kepner. 2008. The Ecological and Hydrological Significance of Ephemeral and Intermittent Streams in the Arid and Semi-arid American Southwest. U.S. Environmental Protection Agency and USDA/ARS Southwest Watershed Research Center, EPA/600/R-08/134, ARS/233046, 116 pp.