

Data Submitted (UTC 11): 2/17/2021 11:28:48 PM

First name: Bruce

Last name: Arrant

Organization: Friends of Kelsey Creek 528G

Title: Managing Member

Comments: The Integrated Management of Target Shooting (IMTS) proposal for the Pike and San Isabel National Forests Cimarron and Comanche National Grasslands (PSICC) will significantly reduce destruction of resources and property, vastly eliminate litter, and make lead remediation self-rectifying but only with the installation of permanent reactive targets at the proposed ranges. Ninety-five percent of property damage is caused by people shooting signage and other property instead of targets. Ninety percent of resource damage is a result of users inappropriately placing targets on trees or firing at resources because they failed to bring targets. Eighty-five percent of trash littering popular shooting areas is household garbage inappropriately used as targets. Permanently installed reactive steel and polymer self-healing targets is vital to the elimination of litter, ceasing resource damage, the key element to self-sufficient ranges, and critical to the IMTS program's success.

Reactive steel and polymer self-healing targets give shooters instant acknowledgement that they are successfully connecting with their intended objective. Target manufacturers are aware of this fact and produce various target systems that can change color, produce sound, shatter, display movement, and explode. Unfortunately, cheaper and more widely available alternatives to manufactured targets utilized by shooters are plastic, glass, and aluminum beverage containers. Because of their highly reactionary nature to being shot, pressurized containers of paint, shaving cream, whipped dairy, hair spray, foam, and gas canisters are a constant recurrence at popular dispersed shooting areas. With a misguided attempt to be environmentally friendly, people will also shoot fruits and vegetables assuming the biodegradability of these targets alleviates the responsibility of removal. Finally, electronics, appliances, and automobile parts are also popular alternatives to manufactured targets that produce audio and visual feedback to shooters but are rarely removed from the areas after use. PSICC Order # 2020-03 made using only commercially manufactured targets lawful while dispersed shooting, but it has not had the effect or desired result of reducing the volume of trash left behind. The installation of permanent reactive targets at every range is the only solution to significantly eliminate litter from this type of activity.

Protecting resources and property is also accomplished by the addition of permanent reactive targets at every range constructed. The most obvious resource damage in the popular dispersed areas is the dead, dying, and felled trees destroyed by gunfire. Irresponsible shooters attaching targets to trees and others without targets shooting the resources simply for a visual reaction, creates a very undesirable landscape and waste of resources. The audio and visual reaction of shooting signage and other property is an exact duplication of target manufacturers' goals when engineering their products. Providing these fixed range locations with permanent reactive targets will procure a vastly improved user experience, controlled direction of fire, and will eliminate destruction of property and resources.

Adding phosphorous to the area surrounding the permanent targets will bind lead fragments and form pyromorphite crystals, a mineral species composed of lead chlorophosphate: $Pb_5(PO_4)_3Cl$. This form of lead, which is non-toxic and not bio-available to plants, is a beautiful emerald green crystal. Engineering a simple bed surrounding each fixed permanent target and regular testing of the soil is needed to confirm that pyromorphite is indeed being formed. With proper preparation and pH monitoring, crystal formations could begin in several weeks. Effective and consistent production of pyromorphite crystals will eliminate any need for phytoextracting plants or mechanical extraction of heavy metals.

While the safety of all Forest users is often brought up as a consideration for the construction of designated shooting areas, the subject is irrelevant. The number of fatalities causally related to dispersed target shooting in the PSICC over the last 40 years is two deaths. Every other activity on the Forest, including birdwatching, has a higher number of fatalities than dispersed shooting. As recorded by numbers, target shooting is historically one of the safest activities conducted on the Forest. Any chosen recreational activity on the Forest has levels of risk

associated with it. With the installation of permanent targets, the elimination of going down range has significant safety advantages for users and control of shooting direction benefits everyone.

All seven proposed ranges should be expanded and constructed along with the evaluation of more sites for future development. Also, a youth oriented .22 caliber rimfire range must be included in the plan. Small Arms Survey reported that there are over one billion small arms distributed globally, of which 857 million (about 85 percent) are in civilian hands. U.S. civilians alone account for 393 million (about 46 percent) of the worldwide totals of civilian held firearms. Today there are more rifle, pistol, and shotgun owners in the United States than ever before. The National Rifle Association reported the number of firearms processed into US civilians' hands last month was over 2.2 million which is a 80% increase over sales from January of 2020. The Colorado Bureau of Investigation conducted more than 500,000 background checks for gun sales last year, almost all of which were approved. It was the most in state history, and a 46% increase over 2019. In the Denver area, Bristlecone, a firearms retailer and shooting facility in Lakewood, had its best year ever in 2020 after posting a 65% increase in firearm sales from the year before and Bristlecone was by no means the only Colorado gun store that did a brisk business in 2020. The demand for recreational sport shooting locations, target practice areas, youth competition facilities, and firearms training accommodations is growing at an exponential pace.

Building or expanding only one range per District will lead to severe overuse, congestion and overcrowding. These conditions will inevitably lead to violations of every management trigger described in the proposed action and ultimately a failure of the IMTS. I have witnessed the outcome of too many individuals attempting to utilize a limited resource and the destruction that occurs when that resource is stretched beyond the intended capacity. One range per District is currently inadequate and grossly underestimates future demand. All seven ranges conceptualized in the IMTS proposal must be significantly expanded, built quickly, and development plans for other sites needs to be instituted simultaneously with the construction of the currently proposed ranges. Without all seven proposed ranges implemented, developed, expanded, and constructed, the problems the IMTS proposal intends to rectify will continue.

Another consideration that further clarifies the reason all seven proposed ranges must be developed, expanded and additional ranges considered, is tourism. Take the beauty and breath-taking scenery of the PSICC, add shooting and archery facilities, spice it up with easy access, add dash of conveniences and you have a recipe for tourism from all over the world. If you build it, then they will come and they will come from everywhere.

As far as development phases are concerned, there are several reasons that NFSR 536 should be the initial range developed. First, it is the closest proximity to the largest metropolitan area in the state, Denver. Second, access to the area is available through multiple alternative routes giving users the ability to avoid and reduce traffic congestion. Third, as it is being constructed users of NFSR 528G, one of the most popular dispersed shooting areas, will see the new facility being constructed directly across the street, can be informed of the upcoming changes under the IMTS, and share with other users news of the developments. Fourth, as Turkey Tracks is being developed, NFSR 536 & NFSR 528G are only 21 miles away and users from the Southern region of the Forest can be redirected to NFSR 536 & NFSR 528G with a vary scenic short drive. Fifth, as Harris Park is being developed, users from the North can be redirected 28 miles to NFSR 536 & NFSR 528G. Lastly, the size and scope of NFSR 536, currently over 300 acres, combined with the expanded capacity of NFSR 528G should accommodate a vast number of guests normally using Turkey Tracks or Harris Park.

There should be at least one range on the Forest dedicated to plinking. The term "Plink" is a short, sharp, metallic, or ringing sound made by a .22 caliber bullet hitting a steel target. A "Plinking Park" or "Rimfire Range" as it is commonly known is where only .22 caliber rim fire ammunition is allowed. These Rimfire Ranges provide an opportunity for young shooters to enjoy the sport in an atmosphere without the distraction, intimidation, and noise of larger caliber firearms. The .22 caliber is the most popular rifle and pistol sold worldwide. More .22 rimfire ammunition is produced and sold than any other caliber. It is also the standardized caliber used in the Olympics and Biathlon competitions. Also, the .22 is the chosen round of every competitive youth rifle shooting

sport.

After the completion and opening ceremonies of NFSR 528, optimally NFSR 528G would be then converted into a .22 caliber only facility. The limited distance range of NFSR 528G is ideal for the .22 caliber rifles and pistols used for plinking. NFSR 528G needs to be expanded to incorporate the large open space on the North side (See photo attached). This area is often utilized as an overflow area when 528G is overcrowded and routinely used by dispersed shooting enthusiasts. Expanding 528G to incorporate the cleared area on the North side would increase capacity and provide for a larger youth-oriented facility.

Along with the construction of permanent reactive targets, the success of the IMTS is also dependent on the inclusion of several key items at every range. Restrooms are a vital and needed convenience. Fee kiosks, donation stations, trash cans and brass collection points are also required for a self-sustaining range to optimally function. A detailed and visually oriented website dedicated to each range similar to www.528G.org will educate users before they arrive. Allowing private organizations to adopt each range will result in monthly cleanups, weekly trash removal and onsite user education. Finally, prominent signage in multiple languages is the best way to convey instructions for proper usage of all the facilities.

In closing, I believe the IMTS proposal has the potential to be the solution manual for problematic popular dispersed shooting areas in the PSICC and every other National Forest under the USFS jurisdiction. I am confident the PSICC leadership will see the value in the IMTS and implement every consideration proposed for the success of the measure. By delivering world-class science, technology and land management, this will be the solution to meet the needs of present and future generations.