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First name: Melanie

Last name: Wasco

Organization: US EPA

Title:

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Diana M. Trujillo, Forest and Grassland Supervisor

Pike and San Isabel National Forests

Cimarron and Comanche National Grasslands

c/o Jennifer DeWoody, NEPA Planner

5575 Cleora Road

Salida, Colorado 81201

Dear Supervisor Trujillo:

The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Department of Agriculture Forest Service January 2021 public scoping notice to prepare an environmental analysis for the Integrated Management of Target Shooting on the Pike National Forest Project. The Pike National Forest (Forest) is part of the Pike and San Isabel National Forests Cimarron and Comanche National Grasslands. In accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), we are providing the following scoping comments.

The public scoping notices discusses the need to provide other opportunities on the Forest for designated and managed target shooting due to increased recreational use levels and the growing risk to public safety, resource damage and user conflicts. The Forest proposes to 1) develop at least one shooting range on each ranger district; 2) close areas of the Forest to dispersed shooting based on potential risks to public safety, wildfire, impacts to adjacent private property; resource damage, user conflicts, or enforcement access; and 3) implement these changes using a conditions-based adaptive framework. The Forest's intent to designate specific locations for shooting ranges is to allow for lead collection and abatement, reduce wildfire risks, and minimize potential conflicts with other users.

We understand that prior to proposing this project, the Forest partnered with ten other land managers including federal and state agencies, counties, and public utilities to address issues related to target shooting on public lands in the region. Four listening sessions were also held in 2019 to involve the public. Following collaboration with stakeholders, the Forest developed a conditions-based adaptive management approach for this project. We appreciate that the adaptive management strategy identifies a suite of potential management activities, describes the expected outcomes (desired conditions and potential effects of the actions), and defines the thresholds that trigger management actions. To ensure that areas designated as open to dispersed target shooting maintain these desired conditions, specific indicator measures will be monitored and are described in the adaptive

management strategy. We recognize and can appreciate the planning and effort put forth in developing this thoughtful integrated management plan.

The EPA is principally interested that this analysis includes a lead management plan to protect surface water, groundwater and wildlife resources. The EPA has developed a set of recommendations to help prevent lead-related impacts at shooting ranges through stormwater management, preventing migration to groundwater, and managing the lead itself. Locating shooting ranges away surface water and shallow groundwater resources is an important first step. The EPA has developed a BMP manual in collaboration with other stakeholders that provides a four-step approach to lead management at outdoor shooting ranges (see <https://www.epa.gov/lead/best-management-practices-lead-outdoor-shooting-ranges>). Those steps include 1) control and contain lead bullets and bullet fragments; 2) prevent migration of lead to the subsurface and surrounding surface waterbodies; 3) remove the lead from the range and recycle; and 4) document activities and record keeping. The manual provides additional information for your consideration when developing site-specific BMPs and we hope you find it useful in developing the lead management plan for these shooting ranges.

We appreciate the opportunity to provide comments at this early stage of the NEPA process. These comments are intended to facilitate the decision-making process; thank you for considering our input.

If we may provide further explanation of our comments, please contact me at (303) 312-6540 or wasco.melanie@epa.gov, or Phil Strobel, the NEPA Branch Chief, can be reached at (303) 312-6704.