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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

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Submitted via email to [jennifer.dewoody@usda.gov](mailto:jennifer.dewoody@usda.gov)

Dear Supervisor Nehl:

The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Department of Agriculture Forest Service November 2024 Environmental Assessment (EA), Draft Decision Notice and Finding of No Significant Impact (FONSI) 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. Please note that this letter is not intended as a written objection under the Forest Service's objection process, rather it is intended to inform the proposed decision and anticipated finalized EA and FONSI.

The 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 2) that identifies and would close unsuitable areas, would develop at least one shooting range on each ranger district (i.e., a minimum of three from the sites identified), and defines an adaptive management framework that includes management activities based on pre- and post-project implementation monitoring requirements; and 3) the Minimum Action (Alternative 3) 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 which it does not use: areas within 150 yards of a boundary of National Forest Service lands, and areas within 150 yards of intermittent streams.

Based on the Draft Decision Notice and FONSI, the Forest Service plans to implement a modified version of Alternative 2, the Proposed Action. Among other changes, a larger buffer will be incorporated around historic properties, trailheads leading to wilderness areas, and trails within wilderness areas where dispersed target shooting will be prohibited due to the non-renewable nature of historic features and the sensitive nature of wilderness characteristics. Also, a wildlife corridor was removed as a possible location for a shooting range and will not be developed. Overall, Alternative 2 provides greater protection to habitat for threatened and endangered species and those proposed for listing, prohibits dispersed target shooting along perennial and intermittent streams, and aims to reduce the potential for wildfire ignitions from shooting activities.

In our September 4, 2024, letter when we commented on the August 2024 Draft EA, the EPA supported Alternative 2 due in part to areas within 150 yards of intermittent streams being identified as inappropriate for dispersed target shooting, a protection that is not included in Alternative 3. Based on the Forest Service's Draft Decision document, both perennial and intermittent streams are recognized as valuable environmental resources. 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 and directly affect the integrity and functional condition of higher-order waters downstream. Safeguards included under Alternative 2 will help prevent waste and other pollutants stemming from dispersed target shooting activities from entering waterways by prohibiting dispersed target shooting along both perennial and intermittent streams. The EA states on page 82 that because intermittent streams would not be closed to dispersed target shooting under Alternative 3, the risks 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. Therefore, the EPA supports the more environmentally protective measures included under the modified 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](mailto:mccoy.melissa@epa.gov), or Melanie Wasco of my staff at (303) 312-6540 or [wasco.melanie@epa.gov](mailto:wasco.melanie@epa.gov).

Sincerely,

Melissa W. McCoy, Ph.D., J.D.

Manager, NEPA Branch

Environmental Justice, Community Health, and

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