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Comments: I formally object to the Finding of No Significant Impact decision on the proposed Union County Gun Range. As an Appalachian Trail hiker and volunteer maintainer/manager for over 40 years, my comments focus primarily on impacts to this National Scenic Trail. These impacts are summarized in Issue #2 on page 7 in the Environmental Assessment. Three concerns with respect to the A.T. are addressed in the EA: 1) Impacts on solitude from noise, 2) visual impacts on the user, and 3) safety of users of the A.T. and other recreation users that may not be on the A.T. but in areas near the gun range that are not on the Trail.

The safety issues are addressed in detail in an objection letter from the Georgia Appalachian Trail Club. I am a co-signer of that letter and will not address this issue further in these comments, but consider it a very significant problem.

I have no significant issues with visual and scenic integrity issues surrounding this proposal.

My comments will focus on the noise and its impacts on solitude for recreational users. During many years of discussions of A.T. management issues with USFS partners, I have met numerous USFS employees who are passionate protectors of Wilderness values. The Forest Service has a long and distinguished record of careful stewardship of federally designated Wilderness areas. The Finding of No Significant Impact for this project is inconsistent with that record of good management.

The proposed gun range would impact A.T. hikers in a remote section of Trail in the Mark Trail Wilderness area as well as people enjoying the Brasstown Wilderness area. This statement appears on page 35 of the EA:

"Although humans are known to habituate to certain noises, given the expectation of quiet and solitude on the A.T. and adjacent Mark Trail and Brasstown Wilderness Areas, the most likely non- audible direct effect of the proposed target range would be annoyance when recreational users are within ear shot of the range. Annoyance experienced by wilderness and trail users would likely result in people moving away from the noise. Backpackers may decide to camp further away and out of ear shot of the target range. Indirectly, this may result in the abandonment of campsites in earshot of the target range and potentially, the temporary overcrowding of campsites where gun noise cannot be heard during peak wilderness and trail usage periods. There is a campsite at Chattahoochee Gap due to a spring water source over the ridge and campers at this site are likely to hear gun fire during the daytime operations of the range."

On page 41, the following statements appear:
"A.T. thru-hikers would most likely still visit the sections of the trail affected by the proposed shooting range. With a set start and finish point and designated trail areas, the user has no choice but to pass along affected areas to complete the thru hike."

"Backpackers may choose other wilderness areas to visit and remain wary of areas on the Mark Trail and Brasstown Wilderness Areas closest to the range."
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How can these statements be consistent with USFS traditions of protecting Wilderness experiences? The EA actually acknowledges that hikers would likely avoid this special, relatively remote area of the Trail. The second statement above essentially admits that thru-hikers would only use this area because they have no choice if they want to hike the entire Trail! Is this within Limits of Acceptable Change in Wilderness areas?
I do not think that alternatives to this site for a gun range have been adequately explored or that a need for another gun range in this area has been adequately justified.

I also have concerns about the use of public land for a private facility.

Thank you for the opportunity to submit the objection.