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Comments: The Pikes Peak Group of the Colorado Mountain Club strongly endorses the proposal for Integrated Management of Target Shooting (IMTS) in the Pike National Forest, project 57807. The proposed plan is very thorough in its approach to this problem, so if implemented will go a long way toward reducing resource damage, wildlands fire risk, and impeding other recreational uses. We are particularly impressed by the adaptive management plan that would be used to review areas that would remain open to dispersed target shooting and lead to their closure if warranted. The collaborative approach you have undertaken with the Southern Shooting Partnership demonstrates that many land managers understand the problem and have been working together to develop a strong plan of action.

We also endorse the establishment of a least one developed shooting range in each of the three affected Ranger Districts. Such ranges will balance the restrictions on dispersed target shooting and provide opportunities for this activity that will be safer and more responsible. While we are in no position to evaluate the possible sites in detail, all other things being equal we would prefer that the ranges be located in areas that already receive a lot of motorized recreation and are easily accessible. These would include, for example, the Turkey Tracks and Wilkerson Pass locations. The ranges should not be located near trails, trailheads, or areas popular for dispersed camping. These would exclude, for example areas along Rampart Range Road.

We encourage the adoption of all the closure criteria listed on page 9 of the proposed action. We want to particularly endorse the inclusion of intermittent streams among the waterways receiving a 150-yard buffer, a step that will offer better protection for our surface and ground water quality. We would, however, like to see some modifications to these closure criteria and to adaptive management:

1. The one-quarter mile buffer should be applied to all system trails, not just "highly visible" ones. The definition of "highly visible" is not apparent either in the project documentation or to recreational users on the ground. There also is no adaptive criterion that might lead a trail to become "highly visible" in the future. The wider buffer would be simpler to manage and would also offer greater benefit: the sound of nearby small arms fire without knowing whether the shooter is responsible is a significant impediment to human-powered or equestrian use of system trails.

2. Add as an indicator condition to the "low risk to public safety" desired condition discharging a firearm across a forest service trail. Forest service regulations under 36 CFR 261.10(d) apparently only prohibited discharging firearms on or across roads. Firing across trails poses a risk to public safety independently of any close call reports listed under this desired condition - the presence of humans on a section of trail can change very quickly.

3. Add an indicator condition to the "sustainable soils" desired condition (or another condition such as adherence to forest service regulations for motor vehicle use) that would address the motorized use of nonsystem routes to engage in dispersed target shooting. Unauthorized parking is listed in the text as a possible cause of compacted soils; restricting parking or limiting vehicle access is listed as a management action. However, driving 150 yards from an MVUM route to engage in dispersed target shooting should be noted explicitly as an indicator that prompts action to both block the route used and close the area.

Finally, we emphasize that this plan will only be effective at resolving this problem if adequate resources are allocated to enforcement. We urge the Forest Service to ensure that future budgets include sufficient funding for enforcement and that those funds be fenced from diversion to other purposes.

Thank you for the opportunity to comment on this proposed action!

