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Comments: I am writing in support of Alternative 2 in the proposed Integrated Management of Target Shooting (IMTS) in the Pike-San Isabel National Forest, project 57807. As noted in prior comments I authored when I was Conservation and Stewardship Chair for the Pikes Peak Group of the Colorado Mountain Club (a post I stepped away from last month), the proposed plan is very thorough in its approach to this problem. If it is implemented, it will go a long way toward reducing resource damage, wildlands fire risk, and threats to public safety. I continue to be 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.

My comments in this letter focus on the Pikes Peak and South Platte Ranger Districts, particularly the portions within the Rampart Range, but no doubt apply more generally.

Alternative 2 appears to prohibit dispersed shooting within the entire PPRD and in the South Platte east of Lost Creek Wilderness. This is a very simple, clear solution to the issues that prompted the proposal. It takes care of concerns about whether the quarter-mile buffer would be applied to all system trails rather than just "highly visible" ones. It also takes care of concerns about the many nonsystem trails that get recreational use. Finally, it takes care of concerns about people illegally driving motor vehicles on non-MVUM routes to engage in dispersed shooting. In sum, the current Alternative 2 looks like an excellent resolution to the identified problem.

I oppose Alternative 3 because it brings those issues back into play despite prohibiting dispersed shooting in many areas. A partial list of popular recreation areas that would be open to dispersed shooting includes:

- \*on Chautauqua and Sundance Mountains near Palmer Lake,
- \*along the trail that leads to the Sydney Harrison crash site near Palmer Lake,
- \*along the network of trails west of Upper Palmer Reservoir,
- \*at climbing areas known as Chimney Peak near FR324 and Parachute Rock near FR327,
- \*along a variety of north-south cycling trails in the Rampart Range,
- \*part of Whites Gulch north of Woodland Park,
- \*the peaks immediately west of the Air Force Academy,
- \*on and near Blodgett and Lone Pine Peaks near the south edge of the Air Force Academy,
- \*on and near Stove Mountain above Saint Mary's Falls, and
- \*on and near Cameron Cone, Mount Arthur, and Tenney Crags near Manitou Springs.

While adaptive management could be used to close some of these areas as hazards become apparent, I suspect that process would not be swift. It would be a shame if it took another tragic accidental death before any action was taken.

The stated rationale for Alternative 3 appears to be travel time. While I acknowledge that the developed shooting ranges would not provide the same experience as dispersed shooting, Alternative 3 does not meaningfully reduce travel time to recreational shooting locations. The closest area open to dispersed shooting in Rampart Range would be off FR322 near FR300. That location is 21 minutes from Woodland Park, through which most people from the Colorado Springs area would pass. Even for people driving up FR320, it would be a 58-minute drive from downtown Monument. Turkey Track is only 18 minutes from Woodland Park and 55 minutes from Monument. The same holds for locations south of Pikes Peak. The proposed shooting range is closer than the nearest areas left open to dispersed shooting, which perhaps are near Stove Mountain above Saint Mary's Falls and in the area of the Broadmoor's Emerald Valley property.

Alternative 3 envisions that people will "travel by non-motorized means beyond the closure areas" for at least 150 yards to reach the dispersed shooting areas. In some cases, that travel would be a quarter mile (440 yards) from some roads; it's not clear how people will know which buffer applies. In my many years of recreating in the National Forest, I have never run across someone engaged in dispersed shooting at any distance from their vehicle. They perhaps would do so in the future, but the effect of that would be move the firearms and the associated public safety hazard closer to recreation areas. Now, when I hear gunfire along FR322 (for example), I know that even if they are firing without a berm as many do, at least they are a good distance away with many trees between us. If people begin hiking away from roads to engage in dispersed shooting, they will be more likely to encounter cyclists and hikers. In fact, they most likely would use the existing nonsystem trails to move deeper into the forest to begin using firearms. As noted above, it would be a shame if more deaths happened in the Pike as a result.

A deeper flaw with the road setbacks is that they only apply to legal routes on the MVUM. There are many non-MVUM routes that are used a lot by full-size vehicles, and many others that are used by ATVs and dirtbikes. These routes are particularly prevalent along FRs 322, 323, 324, 325, and 327 in the Rampart Range and off FR381 near Stove Mountain. Motorized use on these routes is illegal, but the Forest Service has not yet found a way to prevent it. Nothing would stop people from driving 150 yards-or in some cases, over a mile-to engage in dispersed shooting without leaving their vehicles.

The text associated with Alternative 3 also notes management and monitoring issues. It strikes me that management of Alternative 3 would be much more difficult than management of Alternative 2. In Alternative 2, it appears that any use of firearms in the Pikes Peak Ranger District and the eastern part of the South Platte Ranger District would be prohibited unless it were associated with hunting. In Alternative 3, on the other hand, law enforcement would need to discern the exact location of the dispersed shooting and determine whether it was allowed. Alternative 3 would also push user-created firing ranges (which are prohibited but, like the use of non-MVUM routes, not prevented) away from roads and into meadows and glades where they will be more difficult to monitor and clean up.

Thank you for the opportunity to comment on this proposed action! While I clearly support Alternative 3 over Alternative 2, either would be a tremendous improvement over the status quo Alternative 1.