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Organization:

Title:

Comments: Thank you for soliciting my input on the proposed plan for the Integrated Management of Target Shooting on the Pike National Forest. Given that irresponsible target shooters caused these issues, I understand the concerns of the USFS.

While I appreciate the underlying concerns of the USFS, I do not think the proposed plan is in the public interest for the reasons discussed below. My comments are directed mostly to the plan to develop Turkey Tracks on Hwy 67 in Douglas County.

1. Danger to people from stray bullets (public safety): I feel the development plan for Turkey Tracks significantly increases the risk of serious injury and death to individuals due to: (1) my understanding there is no funding for the USFS to staff Turkey Tracks with a sufficient number of competent range officers, at every range, at all times when shooting is permitted and where what is proposed is truly a shooting range that will be very popular including with people from the greater Colorado Springs Metropolitan Area (where the population is expected to significantly increase in the next decade) and the greater Denver Metropolitan Area (putting even more stress on Turkey Tracks and an undue burden on people who live in the area); and

(2) although designed with good intentions and even with well-built berms/bunkers, the design of the proposed omnidirectional galleries are inherently flawed because bullets will undoubtedly go over the berms/bunkers and land in undesirable and dangerous areas.

1. User conflict: I suggested user conflict will significantly increase between shooters at Turkey Tracks if the proposed plan is implemented due to the increased use and the significant increase in the numbers of shooters who will go to Turkey Tracks - especially without range officers with arrest authority. Presently, use of Turkey Tracks is very limited due to the limited number of widely disbursed "ranges". The proposed plan will concentrate many more shooters on the proposed ranges.

2. Noise issues: The noise experienced from people shooting in the forest is negligible and disbursed. Most of that shooting is in remote areas not of concern to people. The increased use of Turkey Tracks will increase the noise nuisance experienced by local residents.

3. Destruction of vegetation including trees: Although I agree destruction to vegetation including trees would be reduced in the forest by implementation of the proposed plan, I feel the increased risk of serious injury and death to individuals greatly outweighs the destruction of vegetation. Plus, from what I see in the forest, there is not much vegetation destroyed in the forest by shooters to consider this concern as a serious factor in the determination of the USFS.

4. Fire Danger: I assume the number of fires in the forest started by shooters is a small number. I agree the proposed plan mitigates wildfire risk by limiting shooting to Turkey Tracks which is located in the Hayman burn area. However, as stated above, I feel strongly that the risk of serious injury, risk of death and increased user conflict are the larger public interest issues with which the USFS should be concerned.

5. Garbage: I agree also the proposed plan should reduce the amount of garbage in the forest by limiting shooting to Turkey Tracks. However, organizations such as "Focus on the Forest" and other organizations and individuals mitigate the issue of garbage in the forest. Again, I feel strongly that risk of serious injury, risk of death and increased user conflict are the larger public interest issues with which the USFS should be concerned.

6. Final Comments:

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1. Most enforcement of violations in the forest in my area fall on the Teller County Sheriff's Office. The proposed plan will increase the need for law enforcement to respond to shooters who undoubtedly will violate the proposed

ban of target shooting in the forest. I suspect the developed Turkey Tracks will draw more shooters and when the ranges are full, shooters who cannot get on a range will go shoot in the forest. I hope the USFS will not implement the proposed plan without the full support of Sheriff Mikesell (for enforcement in Teller County) and Sheriff Weekly (for enforcement in Douglas County).

2. I assume the USFS will even eventually impose fees to shoot at Turkey Tracks. I suggest the USFS not implement the proposed plan unless it has sufficient funding now and in the future so fees are never imposed - especially funding for a sufficient number of competent range officers at every range at all times when shooting is permitted.

My Recommendation: Instead of implementing the proposed plan, I honestly believe the following is the better course of action for the USFS and users of the forest. Allocate the resources (human capital and financial) that otherwise would be spent on implementing the proposed plan to do the following:

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1. For any existing laws, amend as necessary, and if laws do not currently exist, then adopt laws to accomplish the objectives of the USFS including: (1) mitigating danger to people from stray bullets (public safety) [i.e., designate and clearly mark no target shooting areas in highly sensitive areas of the forest, etc.]; (2) Noise issues; (3) Destruction of vegetation including trees; (4) Fire Danger [i.e., no tracer rounds etc.]; (5) Minimizing garbage; and (6) Mitigating user conflict.

2. Work with other governing authorities to amend and adopt relevant laws.

3. Increase the number of USFS personnel and cooperate with Colorado Parks and Wildlife personnel, local law enforcement personnel and local volunteers to patrol the forest and issue citations to those irresponsible shooters who violate the laws.

4. First time violators should be subject to a meaningful fines. Repeat violators should be subject to more stringent penalties including, ultimately, forfeiture of their weapons and, possibly, other property along with possible forfeiture of hunting rights.

5. Embark on a robust public information campaign educating shooters of: (i) the dangers presented by irresponsible shooters; (ii) the law; and (iii) the enforcement of these laws; and (iv) the consequences of violating these laws.

6. Prosecution of violators will have a specific deterrent effect on those specific violators and will have a general deterrent effect on would-be violators who will be incentivized to comply with the laws otherwise, they too will be subject to prosecution.

7. Although there will always be violators, over time, I suspect the habitual violators will cease and there will be a reduction overall violations.

Thank you, again, for considering my comments.