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Title:

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 submitted on my own behalf and in my former position as Conservation and Stewardship Chair for the Pikes Peak Group of the Colorado Mountain Club, the IMTS help reduce resource damage, wildlands fire risk, and threats to public safety. Your modifications to the plan for this comment cycle do not appear to affect my view of the alternatives, so I mostly here focus on emphasizing the shortcomings of Alternative 3.

Alternative 3 would allow recreational shooting in many areas of the national forest that are popular for hiking, cycling, camping, and motorized recreation. I listed some such areas in my prior letter, 57807-5496-79. Although adaptive management could be used to close some of these areas as hazards become apparent, it would be a shame if it took another tragic accidental death before any action was taken.

In some ways, Alternative 3 may be worse than the no action Alternative 1. In the Rampart Range areas I am most familiar with, most people engaged in recreational shooting set up alongside a road and fire away from it - sometimes safely, too often not, but in public view and at a distance from trails.

Alternative 3 envisions that these people will travel 150-440 yards away from roads to engage in dispersed shooting. Most likely, they will not bushwhack through the forest-they will use existing routes, which may be nonsystem roads, old logging tracks, or trails that fall below the vague threshold of "highly visible." Ideally, they walk to these locations, but it is common in the Rampart Range for people to drive on nonsystem roads that stretch for as much as a mile off system roads.

Dispersing recreational shooting away from the system roads and onto nonsystem roads will bring it closer to hikers, cyclists, dirtbikers, and other recreators, whether they are using these or other nearby routes. Dispersal will also make management and enforcement more difficult. Granted, the motorized use of these roads would not itself be legal, but closure of these routes to motorized use has not been a priority of the Pikes Peak Ranger District.

Even if recreational shooters walk on tracks or trails to get outside the Alternative 3 buffer, they will still be closer to where others are enjoying public lands. Take, for example, decommissioned Forest Road 322A, which gets a lot of use from hikers, cyclists, and dirtbikers but probably does not qualify as a highly visible trail. I am used to hearing people shooting along Forest Road 322 and know not to use most of the old tracks that lead to it because people set up targets along them. If they walk down the track to set up their targets, which will no longer be in view of law enforcement and thus likely to remain in place longer, they will also be much closer to the routes into and along the valley. Under Alternative 3, they could even set up directly on old Forest Road 322A and use it as a firing range.

Alternative 2, on the other hand, is a very simple, clear solution to the issues that prompted the IMTS. It takes care of concerns about the definition of "highly visible" trails. Although it will not reduce the use of nonsystem roads for camping and mudbogging, it will at least not add recreational shooting to the reasons people drive off system roads. In sum, Alternative 2 looks like an excellent resolution to the identified problem.

Best regards,

Tom Mowle

Member, Colorado Mountain Club

