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First name: David

Last name: Govus

Organization:

Title:

Comments: re:objection to the union county target range

Forest Managers

Please direct the attached Word Document to Betty Jewett as the reviewing officer for objections to the approval and FONSI of the Union County Target Range.

Regards

David Govus

Please accept this document as my objection to the decision to approve the Union County Target Range with a finding of no significant impact and is directed to Betty Jewett as the Reviewing Officer and Supervisor of the Chattahoochee National Forest. My brief objection focuses on three points that I have previously remarked on.

1.

The proposed site does not meet generally acceptable design standards for shooting ranges and presents a danger to citizens downrange of the site camping, hiking, or hunting along the Appalachian Trail or in the Mark Trail Wilderness.

2.

Noise from the range will impact the Mark Trail and Brasstown Wildernesses violating the Agency's obligation under federal law to protect the wilderness character of these areas.

3.

The agency has not established that there is a need for the Target Range nor that it conforms to the current Forest Plan.

In the project report by the Agency's consultant Nutter and Associates released on October 22, 2018 as

part of the scoping notice for this project one finds in the 2nd paragraph, first page, this statement.

[ldquo]The proposed shooting range complex would consist of a 200 Yard Rifle Range and a 50 Yard Pistol Range. The proposed shooting range is located in the National Forest near the intersection of GA Hwy 180 and USFS Road 292 southeast of Blairsville, GA. The range layout concept is reproduced in Appendix 4. A graded elevation of 2355[rsquo] was assumed for the completed shooting range.[rdquo]

The firing line is shown on the project layout topo at the end of the document at 2355[rsquo] and the target at 2404[rsquo] . The plain language indicates a graded range at 2355[rsquo] which would require hauling off 60,000 cubic yards of dirt which could easily cost \$300,000. I pointed this out in my scoping comments . In August 2019 Nutter released another report (after the draft EA comment deadline) entitled oddly as the Resource Report for the Human Environment where on page 5 of appendix A one finds this language..

[ldquo]The proposed project would include two shooting ranges, one for rifle usage (600 x 100 foot) and another for pistol usage (150 x 60 foot). Construction would include clearing and removing rock and vegetation, grading and shaping, installation of an access path along the length of each of the ranges, and installation of site specific water control measures. Grading is projected to be minimal, such that the existing slope of the site would be maintained, and would not include cut and fill of soil and subsurface material. The grade of the shooting lanes as proposed would be greater than the 2 percent grade recommended in the US Department of Energy and NRA guidelines. The National Shoot Sports Foundation guidelines recommend that the ranges be [ldquo]relatively flat.[rdquo]

This would result in a range with a slope of over 8% which is 4 times higher than even the highest recommendation. Runaway truck ramps are constructed when the slope of a highway exceeds 7%. Simple geometry indicates that that short shots will ricochet higher and more likely clear the berms. Short shots will occur as will elevated shots that clear the protective berms, as not all users will be competent (holes in the roof over the firing line at the Chatuge range testify to this). In addition to short shots at the 200 yard targets Union County Gun Club literature states that 100 yard targets may be employed. Simple math shows that a shot at a 100 yard target on a range with an 8% grade will strike the ground well before reaching a berm located at 200 yards. The Nutter layout in the supporting documents indicate that the firing direction will be South East into the sun and directly towards the Appalachian Trail and Cold Springs Gap contrary to the DOE recommendation that the firing direction be slightly to the east of north. FSH 2709.14, Chapter 70, Section 71.8, 1.2 states, [ldquo]Require the applicant to have an on-site review of the proposed design conducted by a disinterested range technician advisor.[rdquo] It would be surprising if that technician did not point out that the design proposed and approved has users firing uphill at an 8% grade into the sun towards the Appalachian Trail contrary to all known range design criteria. In the documents found in the draft EA or referenced there is no mention of a review conducted by a disinterested range technician advisor. All of the above clearly indicates that this is a spectacularly unsuitable site. Apparently the club selected the site determined to have a 200 yard range and failed to notice the existing slope or did not realize the financial and environmental cost of leveling the site. The Agency either through neglect or as a result of political pressure has so far gone along with this very bad idea.

The proposed site will negatively affect the nearby Mark Trail and Brasstown Wildernesses and Appalachian Trail with significant noise pollution. The boundary of the Mark Trail Wilderness lays less than $\frac{12}{100}$ mile from the proposed range and it is less than 1 mile to the Appalachian Trail Corridor (AT) as it runs from Cold Springs Gap to Chattahoochee Gap. On November 7 2018 I, along with 3 other volunteers from Georgia Forest Watch, participated in a test to monitor the sound produced by shooting firearms that would be commonly used at the proposed range. The 4 of us scattered out at various points along the section of trail. An assistant fired multiple rounds from a .357 magnum, a .223 AR 15 and a .38 revolver at the proposed range site. I was stationed at the low point of the trail section well within the boundary of the Mark Trail Wilderness and on the AT. The sound was

very loud even tho my hearing is impaired. I was shocked at the level of noise as I was directly behind Turkey Pen Mt. and thought that this obstruction between me and shooter would muffle the sound. It did not.

A fellow surveyor stationed on the high point of this section of the trail recorded a decibel level of 78.5 dBA on the Appalachian Trail, approximately 0.5 miles west of Chattahoochee Gap (34.81953, -83.800468). This represents a noise level that is 10000 times greater than the back ground noise level of 30 SPL (as estimated by Nutter) in this section of the Mark Trail Wilderness along the AT. In the several hours that I spent in the Wilderness and along the trail I experienced complete silence other than when the firing was occurring. All of us filled out the USFS noise evaluation forms. On Wednesday the 7th all of the leaves were still on the trees which muffled the sound to some degree. A test later in the year would result in recording louder sounds. The Agency conducted two live fire tests. The first test was conducted with no observers on the AT for reasons that remain unclear. The second test included observers on the AT but all at one spot in the sound shadow of Turkeypen Mt. and none with a decibel meter. The Georgia Forest Watch test was the only test to actually measure sound levels and to have observers spread along the affected portion of the AT and the Mark Trail Wilderness

The Wilderness Act of 1964 states in Section 4(b): "Except as otherwise provided in this chapter, each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area and shall so administer such area for such other purposes for which it may have been established as also to preserve its wilderness character." The legislation establishing the Mark Trail and Brasstown Wilderness Areas does not contain language that would absolve the agency from this obligation. If the need for this range is as great as the applicants assert one would expect that on a busy day both Wilderness Areas and the above mentioned section of the AT would be bombarded with constant noise. This section of the AT which would be affected is reputed to be the wildest section of the trail in Georgia and to encompass more designated wilderness than any other section of the trail in its entire 2000 mile length. As a back country hunter for the past 50 years in north Georgia I am used to the occasional gunshot. The firing that we conducted for this test only lasted a few minutes and all of us were expecting it. An AT hiker and wilderness user, would find the constant loud noise on a busy day unsettling, and as most would be unfamiliar with the existence of the range, frightening. The sound of gunfire is different than other noise and to many people can connote death and fear. The Agency's own consultant, Nutter and Associates, write in the August 2019 report ..Resource Report for the Human Environment..(released after draft EA comments were due)

"This would potentially cause an increase in density of user per acre in other wilderness areas. However, only a small portion of the AT in the Mark Trail Wilderness within the national forest would be impacted. The more likely outcome is that 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 along the AT that are in earshot of the target range and the potential for temporary overcrowding of campsites where gun noise cannot be heard during peak wilderness and trail usage periods[...]. Similar to day hikers and backpackers, fisherman/hunter usage would likely decrease in the area. With an increase disturbance to terrestrial game species and potential disbursal from the area, hunters would likely choose other wildlife management areas or places in the forest where animals are less affected. Recreation shooter usage on the proposed project site would dramatically increase due to operation of the proposed range."

The agency has an obligation under Federal law to protect the solitude of this Wilderness Area and siting a shooting range at this location is an abdication of that responsibility and a violation of law.

As with all management decisions the agency must show that the proposed activities conform to direction given in the Forest Plan .To this end the agency states in the scoping notice [...].

Goal 31 of the Forest Plan of Chattahoochee-Oconee National Forests directs us to "Provide a spectrum of high quality, nature-based recreation settings and opportunities that reflect the unique or exceptional resources of the Forest and the interests of the recreating public on an environmentally sustainable, financially sound, and

operationally effective basis. Adapt management of recreation facilities and opportunities as needed to shift limited resources to those opportunities.[rdquo]

As someone who has hunted actively on the Chattahoochee National Forest for the past 50 years I certainly feel that hunting is nature based. I don[rsquo]t understand how target shooting with all its negative environmental side effects can be considered nature based. Depositing vast amounts of lead into the earth and creating a wildlife dispersing din, which will be the end result if this project if approved, can hardly be considered nature based or friendly. The future of target shooting is indoors.

One of the Agency guidelines for issuing a special use permit is :

[ldquo]Request does not unreasonably conflict or interfere with administrative uses, other scheduled or authorized existing uses, or use of adjacent non-NFS lands".

The decision to site this nuisance less than .5 mile from the Mark Trail Wilderness and within hearing distance of the AT and numerous residences and to orient the range towards the AT is particularly difficult to understand given that the underutilized Chatuge target range is 3.6 miles away and membership is available for a nominal fee.

David Govus