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Comments: I have reviewed many of the materials provided on the Integrated Management of Target Shooting on the Pike National Forest website, attended a virtual meeting in the past, attended a live meeting in Divide, August 2024 and visited/studied the subject site. Whereas the idea of Integrated Management of Target Shooting is a good one, after the proposed plans are implemented one of the proposed sites will still be too prone to wildfires and located too close to hundreds of residents to be considered. The NFS data alone predicts 10 times more damage due to wildfire can occur on this site as compared to most of the other proposed sites.

I live in Westcreek, next door to the Turkey Tracks Shooting Range. Two problems mentioned in the proposals are still of great concern. First is the near constant loud noise, the second is the frequent fires. I note on the planning maps that many of the shooting galleries, especially several (60%) of the Hunting Simulation Ranges, faced in directions between due west and north-northwest. Westcreek is west of the site. Trout Creek Subdivision is north of the site. Nearly 300 people reside in or around these residential areas. At the last meeting I specifically asked a question about noise reduction, a question that was actually published in the Pikes Peak Courier. The question: "I live 2.5 miles away and the noise is over 45 decibels, Saturday afternoons it's boom boom boom. Will any of this take care of that?" The answer was less than satisfactory. In fact, the answer implied that with the expected large increase of usage at Turkey Tracks the noise could get worse. As to why the indicated directions were chosen, the answer had to do with topography and lay of the land. It should be noted that the other 40% of the Hunting Simulation (long range) sites face southerly. There are no residential subdivisions within 3 miles south or southeast of Turkey Tracks. Whereas the traditional and pistol galleries offered soundproofing techniques, no sound proofing was available for the open long range sites, never mind the occasional stray elevated bullet aimed right for Westcreek or Trout Creek.

I should mention that the normal background noise level in Westcreek is normally VERY low. Some mornings, when no shooting is present, it is absolute quiet. Only when a wind picks up, a chipmunk runs across the yard or a bird is tweeting is some sound heard. So jumping to 45 decibels, maybe more when the "big guns" are going off, is very disturbing especially when one considers a sudden jump from near ZERO to 45 decibel. Plus it's long term and seemingly never ending. Even the local dogs will bark at it or cower somewhere out of fear. After reading the Env. Assessment, I even question the health damage the shooting noise may be causing to the nearby residents.

The other topic of concern is the many fires that occur every year at Turkey Tracks. Some of the larger ones make for great state-wide news bulletins. The smaller ones seem to be quieted. The Mountain Communities Volunteer Fire Dept. Chief has stated numerous times (even quoted in press releases) that Turkey Tracks should be closed down. The area is too flammable and many homes are nearby. I can add winds are commonly from the ESE (blowing right towards Westcreek) and the springtime winds are upwards of 60 to 75 mph. At the Divide meeting before the meeting started, one of the NFS personnel, twice, stated that "80 fires" were started and put out at Turkey Tracks. I did not hear over what period, but based on published information indicating "responding to dozens of shooter-caused blazes in single summers" is a norm, I'm thinking it was last year, 2023.

Information gleaned from the USFS Environmental Assessment (Table 13, pg. 96) shows that even after the "management plan is put into place (Alternatives 2 and 3), Turkey Tracks will still have the highest risk for wildfire damage, at 684 acres using the 90th percentile conditions (assumes fire follows set rules). For the record, these conditions are based on historical data and do not account for current climatic changes. Between late winter and early summer sustained winds of 30 to 40 mph are common. 60 to 75 mph wind gusts are not uncommon. We easily enter the latter 10th percentile several weeks per year. Other information gleaned from the Environmental report is Turkey Tracks wildfire damage rates are estimated 60% higher than the second place proposed site and

3X to over 10X for the other seven sites. Even more alarming than these NFS supplied data is the proposed method to contain possible wildfires to within this 684 acres:

1. Fire lines may include two blades width of dozer line
2. Thinning small trees and shrubs in the shooting lanes and around the parking area and benches.
3. Pruning branches of larger trees to five feet off the ground to reduce potential crown ignition.

Turkey Tracks is located within the 2002 Hayman Fire scar. The immediate area has already been MITIGATED to some extent. Prescribed fires have been conducted. It's been cleared of dead trees; however the immediate area now consists of dense grasses and wild flowers. The area is surrounded by Hayman Fire caused dead trees, standing and fallen. Colorado has seen with the Hayman Fire and others that highways don't prevent wildfire spread. How is a 2 blade width bulldozer fire-line going to prevent spreading? The Env. Assessment states the flames will only get to 1.25 feet high with Alternates 2 and 3. Yet the grass is currently about 1.5 ft. tall. Soon it will be brown and very dry - very combustible. The standard rule of firefighting is to expect flames to reach 3X the height of the fuel. I saw no mention of mowing the long range shooting areas. Trees pruned to 5 feet, yet flames possibly reaching 4.5 ft. This begs the question, is 5 ft. enough? I've read 10 ft. is the norm for mitigating one's property (Colorado State Univ.-Extension). Even if one considers 684 acres of burnt forest acceptable, one should strongly question if a wildfire can be contained to this 684 acre area under a 35 mph wind, or worse yet, a 75 mph wind. How often do prescribed fires exceed their expected areas? The wider Hwy 67 didn't contain the Hayman Fire. Nothing could contain the Marshall Fire of 2021.

An alarming statement was made at the end of the meeting by a Teller County Commissioner. He stated that since a fire (Hayman) had already burned everything, there was nothing left to burn. I'll grant him arriving late and not hearing about the 80 previous fires, but it begs the question: if one is involved with making decisions that affect people's lives, should they not be adequately knowledgeable about the topic? How many more folks have the Commissioner's belief? I found the following statement in the Env. Assessment: "Tree mortality caused by dispersed shooting would increase the amount of fuel that is susceptible to wildfire events as trees and branches die and fall down." Would not this apply to trees killed in a prior wildfire? Never mind that where trees are not growing, grasses often will be growing. I can add, I keep my house very warm during the winter from plentiful Hayman Fire killed trees. Such wood is very dry and ignites easily.

Another area of concern that I did not consider until it was strongly discussed at the Divide meeting is Enforcement. When specifically asked about the ability to police and enforce the rules (including current cleanup woes) entailing Turkey Tracks the answer was a very definite "minimal ability" due to no onsite management and minimal law enforcement presence. When further questioning pressed this issue, the answer was to "permanently shut down the site" if the problems could not be resolved. News flash: the problems exist now! Tons of trash are removed every year, dozens of fires started, noise in the local neighborhoods, and stray bullets. A Facebook page dedicated to Shooting at Turkey Tracks strongly shows that many of the shooters go to Turkey Tracks to avoid regulations and restricted areas to shoot in. Will all these shooters voluntarily abide by the new set of rules and restrictions? Some don't abide by the current rules now. The proposed plans may reduce some of the problems, but not eliminate them. With significantly more unsupervised people coming to use the site, would not the increased use just offset the efforts in reduction or possibly even enhance some of the problems? This begs a big question: Would spending big bucks on a site just to have it shut down in a few years be a prudent use of taxpayer funds?

I am onboard with the idea that dispersed shooting in the National Forests needs to be decreased or eliminated and a controlled, managed area put in place. I question the judgment of anyone considering what is shown on the NFS chart as the most dangerous of all the potential places to have a shooting range. With 10 times the damage potential of more than half the potential areas, nearby residents and structures, should the Turkey Tracks location even be considered? OK, I get it, Douglas County has set aside \$400K for this project and money talks. Research as to where much of these funds came from indicate grants, some, possibly all, Federal grants. Basically taking from Peter to pay Paul! Since most grants are awarded for a definite purpose would not these

funds be available for use on a better, safer, site? What's the cost of an out of control wildfire or the continual mitigation of 684 acres? What about lost property tax revenue when houses burn down or home prices drop due to the annoyance of the shooting noise or high insurance rates? One news report reported how one vocal woman solved her noise problem - she moved!

Even the presented data supports the conclusion that the Turkey Tracks site is too dangerous to be considered a shooting range. Of the 9 proposed sites, Turkey Tracks was by far the most dangerous of them all. Much of the area forest is too dangerous for such activity as well. Wildfires and loud noises are a continued certainty. About 300 residents reside between 1 and 2.5 miles of the site. These facts along with other unresolvable problems demonstrate Turkey Tracks is a VERY BAD site to be considered as an Integrated Management site for target shooting, PERIOD. If not for the easy access and available funds already allocated for the site by DougCo, I doubt it would even be under consideration.