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Comments:

Area 1

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January 27, 2026

Ryan Nehl, Forest and Grassland Supervisor

US Forest Service

South Platte Ranger District Office,

30403 Kings Valley Drive, Suite 2-115,

Conifer, CO 80433

RE: CPW's Comments on the Bufo Creek Gun Club Permit Renewal and Expansion project, Jefferson County (SPT1014, File Code 1950)

Dear Mr. Nehl,

Thank you for the opportunity for Colorado Parks and Wildlife (CPW) to comment on the proposed Bufo Creek Gun Club Renewal and Expansion project.

The mission of CPW is to perpetuate the wildlife resources of the state, to provide a quality state parks system, and to provide enjoyable and sustainable outdoor recreation opportunities that educate and inspire current and future generations to serve as active stewards of Colorado's natural resources. CPW has a statutory responsibility to manage all wildlife species in Colorado, and to promote a variety of recreational opportunities throughout Colorado. One way we achieve this goal is by responding to referral comment requests, as is the case for this project.

Project Understanding

It is our understanding that the proposed action is to be located at the Camp Fickes facility on the South Platte Ranger District of the Pike-San Isabel National Forests & Cimarron and Comanche National Grasslands, about six miles southwest of Bufo Creek, Colorado, in Jefferson County. The project site is located within Game Management Unit 501. Under the proposed action, the U.S. Forest Service would issue a special use permit to Bufo Creek Gun Club, Inc. for the following additions to the Camp Fickes facility:

- * A new pistol bay complex (nine bays),
- * A new service road for emergency egress,
- * A covered picnic shelter with tables and a swing set,
- * Two outhouses, replacing the existing facilities,
- * Prefabricated building for hosting classes.

In addition, the proposed permit would include continued operation of the existing facilities:

- * A 100-yard short range,
- * A 200-600-yard range and concrete pits,
- * Established service roads,
- * A cabin,
- * A concrete shingled pit with a shingled roof,
- * Target frames with hoisting devices,
- * Two woodsheds.

The permitted area would expand from 47 acres to 148 acres to accommodate the additional facilities. The permit would be issued for a term of 20 years.

After review of this Project and the location, CPW has the following recommendations:

The Importance Of High Priority Habitats

Developers and permitting agencies can help avoid, minimize, and mitigate impacts to wildlife from their projects by working with CPW. High-priority habitats (HPH) are defined as sensitive habitats where CPW has recent data regarding sensitive wildlife use, plus scientifically backed best management practice (BMP) recommendations. HPHs are a subset of CPW's species activity maps that we actively collect supporting data and update on a regular basis for a variety of species and their particular habitats; we provide these maps to the public and regulatory agencies to support environmental impact assessment and avoidance through land use comments and recommendations for proposed development on a given parcel, and general scientific research.

Fencing

CPW is concerned for the safety of mule deer and elk in the project area. CPW recommends that if fencing is installed, it should be the type that would allow the free passage of wildlife. Fencing plans should avoid the use of woven wire-type fences that will trap or prevent the movement of wildlife. CPW recommends using three or four-strand smooth-wire fencing with a bottom strand height of at least 16 inches above ground level and a maximum top strand height of 42 inches above ground level, along with the installation of double stays between posts. More information can be found in CPW's publication "Fencing with Wildlife in Mind" at: <https://cpw.state.co.us/Documents/LandWater/PrivateLandPrograms/FencingWithWildlifeInMind.pdf>

Noxious Weeds and Native Re-seeding

Also of importance to CPW is the revegetation of disturbed soils and the control of noxious weed species through the development of a noxious weed management plan prior to initiating construction activities. The revegetation of disturbed areas

and control of invasive weed species are important components of the project, and it is critically important that the site be restored to the native plant community that currently exists on the site. CPW prefers that native vegetation be retained on-site during the operational lifespan of the Project, both as potential habitat for wildlife and to ensure successful reclamation of the Project area, as noxious weeds could spread to adjacent habitats outside the project area. CPW recommends that the applicant consult with the Natural Resource Conservation Service (N.R.C.S) for the best noxious weed management practices.

Lead Mitigation

Shooting ranges are at a higher risk for the introduction of lead to the environment, given the abundance of lead shot dispersed on the landscape. If not regularly retrieved and properly disposed of or recycled, lead shot will oxidize when exposed to air. Dissolution from water or soil will then allow for the lead to migrate into the environment through soil, fractured rock, or groundwater. While several environmental factors affect the rate and distance of lead migration, it is a known contaminant in soil, groundwater, and surface water that can negatively impact the health of both humans and wildlife. Lead exposure in wildlife typically occurs from ingestion and has been shown to increase mortality rates, especially among waterfowl species.

Continued efforts to filter out and remove/recycle lead shot and other contaminants from the range will significantly reduce the lead exposure to the environment. Best management practices for lead exposure mitigation may include: sifting soil and backstop material for lead fragments and adding material to adjust soil pH, such as lime or phosphate.

Wildfire Risk

The risk of wildfires caused by target shooting is of significant concern and should be continually monitored. The appropriate mitigation actions that should be taken include, but are not limited to:

- ? Prohibiting the use of Tannerite and other exploding targets
- ? Prohibiting the use of steel-core/tracer ammunition
- ? Limiting operation during hot, dry, and/or windy conditions
- ? Shooting over non-flammable surfaces such as dirt or gravel

Another action to consider regarding wildfire risk would be coordinating with Jefferson County Sheriff to limit the range to the use of lead-only rounds during periods of fire bans within Jefferson County.

If the timing or scope of this project changes and/or if you have any questions, please contact Brady Thornon, District Wildlife Manager at 983-220-4740 or

Brady.thornton@state.co.us.

Sincerely,

Scott Murdoch
Area Wildlife Manager - Area 1

Cc:

Shannon Schaller (Deputy Regional Manager, CPW)
Dawson Swanson (Assistant Area Wildlife Manager, CPW)
Lexi Hamous-Miller (NE Region Landuse Specialist, CPW)
Brady Thornton (District Wildlife Manager, CPW)