

Department of the Army
Corps of Engineers, Omaha District
Attention: Mr. Marvin Taylor, Project Manager
FUDS site #B08CO0067300
106 South 15th Street
Omaha, Nebraska 68102-1618

November 17, 2004

Dear Mr. Taylor:

Reference: Defense Environmental Restoration Program for Formerly Used Defense Sites
Inventory Project Report (INPR) for Property Number B08CO0067300, Camp
Fickes, Pike National Forest, Jefferson County, Colorado

We are in receipt of a letter sent to Mr. Edward LaRock at the Hazardous Materials and Waste Management Division, Colorado Department of Public Health and Environment, by Douglas A. Plack, Department of the Army, Corps of Engineers, Omaha District, date June 8, 2004 to which we wish to comment.

First: The history of Camp Fickes:

In his letter, Mr. Plack states, "The U.S. Army used Camp Fickes for proficiency practice and testing of the Army Corps 2nd Engineer Regiment stationed at Fort Logan, Arapahoe County, Colorado, for two years. Camp Fickes has been licensed to a private gun club for high power rifle usage since 1961 through today. The U.S. Army portion of any remediation necessary at the range is negligible. The U.S. Army's 2 years of use must be compared to the Buffalo Creek Gun Club's 40+ years of use."

It is true that the 2nd Engineers occupied Camp Fickes for 2 years during the 1930s while refurbishing an old range that had been, apparently, founded by the U.S. Army during World War I. After the range was refurbished, it was, at minimum, used by the 22nd Base Headquarters and Air Base Squadrons from Lowry Field. On August 15, 1943, the Denver Post ran a story about the use of this range, then being called "Camp Buffalo." In the article it is claimed the camp is being used for "field, submachine gun and rifle training."

Mr. Plack also states: "The only improvements on the land consist of 12 target frames, a drift fence, six small sentry houses, and one range house..... Buffalo Creek Gun Club has had an ambitious building program during its 40+ year history. They have built at least 15 target frames, an entrance road, 3 target sheds (progressively larger), a pavilion, a clubhouse, underground telephone lines, several toilets, and camp grounds complete with picnic tables and grills. Additionally, several new or upgraded firing berms were constructed. A parking lot evolved from the excavation for one of the berms."

Mr. Plack failed to mention the 120 foot long (approximate), concrete target pit constructed by the U.S. Army, into which were placed their "12 target frames", or the leveled firing berms constructed at 200, 300, and 500 yards from the impact berm. Buffalo Creek Gun Club has, indeed, constructed 15 target frames in the target pit constructed by the U.S. Army. The firing berms constructed by the U.S. Army have been repaired and maintained by The Buffalo Creek Gun Club, but not constructed by the club. The only firing berm constructed by The Buffalo Creek Gun Club is the one at the 600 yard firing point. The construction of this firing point was accomplished primarily, by utilizing the material removed from the U.S. Army's 500 yard berm. An additional amount of fill was apparently obtained from the hillside adjacent to the 500 yard firing point, creating the potential "parking lot" mentioned by Mr. Plack.

Mr. Plack also states: "Decontamination is unnecessary as no explosives were used on the area which was used for a small arms range and apparently abandoned since the expiration of the permits in 1938."

According to the Denver Post Article, August 15, 1943, "Similar attacks are made on the camp itself. The most dramatic of these was made last Sunday, when a new group of men had arrived. The old group was staging a review and parade in their honor, and at the height of the ceremonies, when **platoons** of the old group were marching past the spot where the new group stood, gas and smoke **bombs** were set off." (emphasis added).

Again Mr. Plack states under Hazardous and Toxic Waste: "Only a temporary use latrine was installed at Camp Fickes."

Older members of The Buffalo Creek Gun Club have reported filling in numerous old "outhouses" while refurbishing this range in the 1960s. Additionally accounts from 1937 state, "A Lieutenant Fickes and two other soldiers were in the Engineer's mess tent when a wild lightning storm came up. A bolt struck the tent and killed the three men. Another bolt is said to have improved the 6-hole latrine, located down the hill a bit from the mess tent, by blowing a hole in the ground in line with the existing 6 holes, and thus expanding the latrine to 7-hole service at Camp Fickes."

Second: Comparing U.S. Army use (obviously more than two years) to the use by the Buffalo Creek Gun Club.

It has been calculated that the use of the Buffalo Creek range for high power competitions and practice generates approximately 570 pounds of spent bullets into the impact berm per year. That is the equivalent of 53,000 rounds of .30 caliber ammunition. A typical .30 caliber machine gun, used in World War II fired 550 rounds per minute. Thus, if the U.S. Army had used only one machine gun for training, they would have deposited an equivalent 570 pounds of spent bullets every 97 minutes. This assumption ignores the U.S. Army's use of .50 caliber machine guns with bullet weights ten times that of .30 caliber. Repair work on the impact berm, over the years, has unearthed many .50 caliber bullets.

In summary: It seems the research done by the U.S. Army Corps of Engineers is incomplete and needs to be continued. If in the future this firing range is abandoned by The Buffalo Creek Gun Club, current USFS rules require the area to be restored to its original, pristine condition. This restoration will require the removal of the structures built by The Buffalo Creek Gun Club, the destruction and removal of the target pit and its concrete, landscaping of the entire range to eliminate the firing berms and reestablish the natural contours of the land, and the possible removal of all lead deposited in the impact berm. As the contouring of the land, construction of the target pit, and deposition of lead were all initiated by the U.S. Army, it seems inappropriate that the U.S. Army should claim no responsibility for their actions or the need for their involvement in eventual remediation.

Sincerely,

Michael H. Bevelhimer
Vice President
Buffalo Creek Gun Club

CC:

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