

Informal comments re: Maud Road Rifle Range from an anonymous employee with a conscience and environmental concerns of XYZ (anonymous) federal agency. ("Anonymous" to protect individual(s) within agency; verbage that might identify the individual was removed.)

Dave,

.....This email is past the due date. It reflects my thoughts and does not constitute formal agency comments, so feel free to ignore it if there isn't anything new or useful below.

One thing I don't understand is the sentiment that the Knik River Public Use Area (KRPUA) Management Plan (Management Plan) somehow requires the development of a shooting range. That is not how I read the Goal ("Address safety concerns related to discharge of firearms,") or Management Guidelines found in the Management Plan. The Management Guidelines say that "DNR will explore the possibility of developing areas for recreational shooting...at the existing user created shooting area at Maud Road" This doesn't require DNR to actually develop the site. I would contend that this Guideline allows DNR to determine whether either of the identified locations are actually suited for the development of a shooting range. The other Management Guideline also does not require DNR to develop a range. It clearly states that "it is intended that local groups interested in operation of a shooting range would apply to DNR for development and operation of a facility." It appears that DNR is ignoring this Guideline by developing the range itself.

Some of your commenters have no doubt indicated that developing the range at the Maud Road site is not an effective way to "address safety concerns related to discharge of firearms." As a recreational shooter myself, I would concur. I don't see myself using the new range, and feel that this effort represents something of a lost opportunity. Forgive me if I mis-characterize the effort, but it would have been great if the focus of the "explor[ing] the possibility of developing areas for recreational shooting" had been on the true need for a public shooting range in the Valley and on what such a shooting range should look like.

I understand that you are trying to improve public safety without completely displacing the people that currently shoot on the KRPUA. I suspect that you have several different user groups there. Some people plink while out on the trail or in the woods. While they are probably

not a real problem,(note: BARCO disagrees with this statement) your proposed regulations appear to prohibit this type of activity. There are those who won't go to a developed range because they don't want any restrictions on what or how they shoot, they don't want to pay to shoot at a developed facility, and/or they want their shooting to be a convenient activity that is part of their camping or other use of the KRPUA. These people are likely the ones who concern your other users. They may or may not use the new range, but some of them will probably ignore the posted operating rules. Then there are those who shoot on the KRPUA because of a lack of a developed local range. They may use the new range, although your proposed design is not really suited to their use. The development of a regional public shooting range in the Valley has been discussed by various entities for several years. At best, a new shooting range on the KRPUA will be a stopgap measure that does not really address the very real need for such a facility. At worst, it dilutes the effort to develop a regional facility by taking money and momentum from that effort, and driving a wedge between the shooting and non-shooting members of the public.

I realize that it was never your decision to make, but the Maud Road site is poorly suited for a range location. At a pH of 5.8, the soils are too acidic (high cation exchange capacity will mitigate this to some degree, except that you will be excavating most of the soil to construct the berms). The Kidazqeni and Niklason soils are pretty well drained, but your groundwater is too shallow and the drainage is to the wetlands and lakes. A better solution would have been to not develop a range on the KRPUA, continue to allow dispersed recreational shooting off of the trails, and to work with the Borough, the City of Wasilla and others to develop a regional shooting facility.

The City of Wasilla is planning to develop a shooting range. The \$20,000 from the Friends of the NRA could have been better spent on developing that facility. Or perhaps on expanding the Mat Valley Sportsmen's range south of Palmer. The residents of the Valley deserve a public facility that truly meets our needs. A facility that will be a community asset instead of a source of contention. One that won't become a dump site and an eyesore. A facility that has good access and can be used by our youth, the more mature among us, and those with disabilities, including our returning veterans.

We deserve a range facility that is equal in every way to the public ranges operated by the Department of Fish and Game (ADF&G) in Anchorage,

Fairbanks, and Juneau. A facility that can be used to teach hunter education and archery and muzzleloader certification courses, personal defense classes, and Becoming an Outdoors Woman sessions. We deserve a range facility that is suitable for competition, including at the collegiate level, and perhaps that includes biathlon and practical shooting courses.

There is nothing wrong with the facilities we currently have - I use and enjoy them - but with our population here in the Valley we deserve a local facility that is more than a location for informal sighting-in. A facility with emergency and handicapped access that doesn't pose a public safety or environmental liability, and that won't disturb and displace wildlife from valuable habitat. We don't need a range that will displace other user groups from dedicated public lands and harm the reputation of the shooting community in the eyes of the broader public.

Of course it is not the responsibility of the DNR to provide such a facility. But the DNR's actions on the KRPUA do not occur in a vacuum. Whether or not those actions are part of the solution must be evaluated in the context of the larger issue.

As mentioned above, the state (ADF&G) currently operates three public range facilities. Any new state ranges, even on a smaller scale, should be developed to the same standards as these existing facilities in regards to safety and environmental protection.

It is an unfortunate fact that unstaffed shooting sites often become dump sites. Most land managers here in Alaska and elsewhere have had to contend with this issue. Once dumping becomes common, such sites lose their value to the shooters. DNR, ADF&G, and the BLM have recently expended considerable resources cleaning up "traditional" shooting locations at the Goose Bay and Palmer Hay Flats state game refuges. One site at Goose Bay continues to get worse, and the Alaska Mental Health Land Trust recently returned a forty-acre parcel near Goose Bay to the state because of the presence of an extensive dump/shooting site. While a more "remote" location may seem ideal for a shooting range because it is not near residences or businesses, such a location makes monitoring the site more difficult. The proposed range at Maud Road is adjacent to a primary access; and other users may self-police any standards put in place, but other users cannot substitute for enforcement personnel. Although property owners are not generally liable for the unauthorized actions of third parties, the

reasonably-foreseeable results of authorized activities at developed facilities are another matter altogether. In other words, even under a best case scenario, DNR will be responsible for preventing and remediating any environmental impacts.

In reviewing the public notice, I couldn't understand why anyone would develop a recreational range with a 200-meter shooting lane. I used to shoot handgun silhouettes competitively when I was younger, and you do shoot at 200-meters for some of those events. But that is a specialized case. Most recreational target shooting with handguns or small-caliber rifles is conducted at short ranges. I just don't see the need for such distance. It is not likely that many sheep hunters will bring their chronographs to this location to fine-tune their handloads. I believe that the Upper Susitna and Birchwood facilities each have a single range of that distance. The majority of their ranges (and most heavily used) are 25 and 50 meters. Most hunters sight in their rifles at 100-meters, so those ranges also get used quite a bit, but hunters are not your target user group at the KRPUA. So even a 100-meter lane is pushing it. A family plinking with 22-caliber rifles is a fairly quiet, low-key activity with little potential to disturb other users or wildlife. You can't say the same thing about a hunter shooting a ported .338 Winchester Magnum. Anyone within 100 meters of that shooter is going to wish they were wearing ear plugs.

It seems to me that shorter shooting lanes would serve the needs of anyone currently shooting on the KRPUA. Even though trees have already been cleared, I would suggest an "L"-shaped range, with one half having a shooting distance of 50-meters and the other half 25-meters. Reducing the length of the shooting lanes would have allowed a great many trees to have remained standing. Trees are very effective at muffling noise, and they could be allowed to grow back. Shorter lanes also would reduce the elevation change that has to be dealt with, and substantially reduce the material necessary for construction of the side berms. Less excavation equals less equipment time and less expense. Both of these changes would reduce the total site disturbance and make stabilizing the berms and dealing with drainage through the site easier. Site drainage will have to be addressed. Shorter lanes would also ensure that the target stands are close to the berms. This is important because it helps keep the bullets in the berms and not on the ground in the shooting lane. Good berms can mitigate the issue of lead movement and environmental exposure. Shorter lanes (50-meter v. 200-meter) also significantly reduce the chance that shots will go over the rear berm.

Lastly, short shooting lanes make it more likely that shooters will actually retrieve and dispose of their targets.

Although the plans do not currently identify that target stands will be provided, I recommend that stands be incorporated into the design. A simple method is to suspend chicken wire from wooden posts in front of the berm so that targets can be close-pinned to the wire. This type of inexpensive setup makes it convenient to post paper targets and discourages shooting at other objects on the ground. Shooting towards the ground means that bullets are not ending up in the berm and increases the risk of ricochets.

To help prevent disturbance of and risk to other users, a range-in-use flag should be erected near the range and perhaps near the end of Maud Road itself. Such flags are typically solid red, and when raised serve as notice that the range is in use. On seeing the flag, other users may choose to not enter, to wear ear plugs in the vicinity of the range, and definitely to avoid travelling around behind the range. Controlling access to the area behind the range is an issue that needs to be addressed. With a short, level shooting lane the risk of a short going over the rear berm is limited. There will be more risk if the shooting lane is long, and not level.

..... EPA has published a manual of Best Management Practices for Lead at Outdoor Shooting Ranges. This is a good document that was developed with assistance from the NRA and National Shooting Sports Foundation.

I hope that some of this proves useful,