

Appendix 3
Inland Fish and Game Association
Proposed Recreation and Public Purposes Act Lease Renewal
Results of Public Comment Process

The BLM, Palm Springs-South Coast Field Office, posted Environmental Assessment, #CA-660-04-22, on the office web site (www.ca.blm.gov/palmsprings) for public review and comment from June 9 to July 12, 2004. This review and comment period was extended until July 26, 2004 as a result of several requests from the public for additional review time.

A total of 123 written comments were received during this comment period. The following is a summary of the comments received from the public pertaining to this proposal, along with the BLM responses (in italics):

1. Closing the range would end a strong family tradition [*Discussed in the EA-Impacts Section for the No Action Alternative*].
2. There are no other shooting ranges in the area like Inland Fish and Game (IF&G) [*Characteristics of the range are discussed in the Affected Environment section of the EA*].
3. Existing hours of operation are well within the legal hours for use of noisy equipment such as lawn mowers and power tools [*The lack of regulatory issues relating to noise is identified in Land Use Plan and Regulatory Conformance portion of this EA*].
4. Limiting Sunday hours would restrict people's ability to use the range [*Discussed in the Impacts Section of the EA under the Agency Preferred and Environmental Constraints Alternative*].
5. Residents that moved near the range made an informed choice regarding the background noise created by the range and, therefore, should not object to the continued use of this facility that has been at its present location for years [*Although this may be a factor in an ultimate decision, it is not an issue analyzed in an environmental assessment under the National Environmental Policy Act*].
6. This range is a place for parents to teach their children how to handle and respect firearms [*See description of the facility in the Affected Environment Section of the EA*].
7. The five year lease option considered would be an insufficient amount of time for IF&G to make long-term investments in the facility [*The EA was changed to reflect this comment; see Impacts of the Environmental Constraints section*].
8. Shortening the hours of operation would concentrate use and increase the noise levels during those time periods [*The EA was changed to reflect this comment; see Impacts of the Environmental Constraints and Agency Preferred Alternatives sections*].
9. The adjacent sand and gravel operations, a local noise source, operate more hours than the range; therefore, the range should have more latitude [*Hours for these operations is discussed in the Affected Environment section under Noise; the EA*

- was changed to reflect this comment: see Noise Impacts of the Proposed Action Alternative, paragraph pertaining to human sensitivities to noise].*
10. Installation of sound walls would be cost prohibitive and increasing the height of the shotgun range berm is not possible due to San Bernardino kangaroo rat habitat conflicts [*Costs of mitigation discussed in the EA, Impacts Section for the Agency Preferred Alternative-Land Use Compatibility; existence of San Bernardino kangaroo rat habitat discussed in the Affected Environment and Impacts Sections of the EA*].
 11. Closing the range would eliminate a recreation facility in the Highland area. As Highland is a new community and has few recreation facilities, the range a necessary addition to community recreational opportunities [*Discussed in the impacts section of the EA under No Action Alternative*].
 12. IF&G is supportive of youth programs such as Boy Scouts and Venture Crews; closure of the facility would result in a loss of this very beneficial service to the youth [*Discussed in the impacts section of the EA under No Action Alternative*].
 13. IF&G provides a very beneficial service to youth groups as well as a place for law enforcement officers to practice and the public to receive hunter and firearms safety courses [*Discussed in the Affected Environment Section of the EA*].
 14. Shooting noise from the range disturbs children in classrooms at the school located ¼ miles from the range [*Issue generally identified in the Impacts Section of the EA-Proposed Action and Agency Preferred Alternatives*].
 15. Residents in the Village Lakes area are subjected to shooting noise even with all their windows and doors shut [*Discussed in general in the EA, Noise Impacts of Proposed Action*].
 16. The sound restrictions would not provide much relief from shooting noise [*EA identified that sound attenuating measures would reduce noise levels from the rifle/handgun range, not the shotgun range, and that reducing hours of operation would mitigate noise impacts only during those periods*].
 17. The shotgun range creates the greatest noise impact as the shotgun barrel is pointed in the direction of the nearby residential areas during discharge. Noise is less from the rifle/hand gun range as this range is at a 90 degree angle from the residential areas and less noise is propagated as the angle increases from the source. Noise from rifle/handgun range would be easier to attenuate. [*EA identified that sound attenuating measures would reduce noise levels from the rifle/handgun range, not the shotgun range-see Proposed Mitigation section*].
 18. As noise diminishes quickly over distance from the source, annoyance levels in the adjacent residential areas should not be high enough to warrant any action [*opinion not substantiated by noise annoyance levels documented in the EA*].
 19. EA needs to reference an extensive noise study done prior to development of the East Highlands Ranch. This study indicated that the IF&G Range did not exceed allowable noise levels- this was before the recent building and development- all of which have contributed greatly to overall noise levels in the area [*EA does not incorporate this study as it does not reflect the current situation*].
 20. Schools are local generators of noise along with the Range; impact on students is minimal [*General statement; EA states that sensitivity to annoyance noise is variable across the population; statement difficult to address*].

21. On page 17, the EA implies that the Range is open during evenings (plural), when the Range is open only one evening a week (Wednesday) [*Statements on page 17 of EA were identified as quotes from the scoping comments in relation to the existence of annoyance levels, not as verified statements of fact*].
22. EA does not discuss the Redlands Trap and Skeet facility, located one mile south of IF&G, that has been open for up to three evenings per week until 10:00pm along with Friday afternoons and the weekend. This facility has gone through 3 times the number of clay targets that IF&G does (up to 3,000,000 per year) and the shooting noise is discernable in the East Highlands Ranch area [*The Redlands Trap and Skeet facility was not discussed since use at this facility is changing and uncertain*].
23. If the noise generated by the Range was not disclosed to new residents when they purchased their homes, their issue is with the real estate agents and seller, not with IF&G. Also, owners must take responsibility for not investigating properly if they were unaware of the noise issue associated with the range [*Although this may be a factor in an ultimate decision, it is not an issue analyzed in an environmental assessment under the National Environmental Policy Act*].
24. Range should remain as it is- a rarity (run well, user friendly, neat and clean) [*Characteristics of the facility addressed in the Affected Environment section of the EA*].
25. Potential purchasers of property in the area complain about the noise; implications being that land values are diminished [*Addressed in the Impacts section of all alternatives*].
26. More development is occurring in the area such as 184 homes planned to be built south of 5th Street between Orange and Church Streets; these would be impacted. [*A statement reflecting this comment was added to the Affected Environment section of the EA, under Area Description*].
27. Members of the gun club should have more consideration for their neighbors [*Opinion difficult to address in the EA*].
28. This range is valued as it is a non-profit facility that promotes membership, but is open to the public, and is very economical to use [*Characteristics of the facility addressed in the Affected Environment section of the EA*].
29. On page 17 of the EA, reference is made that students can hear noise from IF&G in their classrooms. Commenter states that noise cannot be heard within a nearby gas station, therefore, this is an incorrect statement [*Statements on page 17 of EA were identified as quotes from the scoping comments in relation to the existence of annoyance levels, not as verified statements of fact*].
30. On page 17 of the EA, reference is made that to the range being open on major holidays including Christmas Day. Commenter states that this statement is incorrect as the facility is closed on major holidays [*Statements on page 17 of EA were identified as quotes from the scoping comments in relation to the existence of annoyance levels, not as verified statements of fact*].
31. Adjacent gravel pits present a far more nuisance to local residents than the range [*Existence of the gravel pits are identified in the EA in terms of noise and commercial development in the vicinity of the range; see Affected Environment and Noise Impacts of Proposed Action*].

32. Resident in East Highland states he was informed of the gun range noise as well as the existence of the gravel pits and the then Norton Air Force Base [*Although this may be a factor in an ultimate decision, it is not an issue analyzed in an environmental assessment under the National Environmental Policy Act*].
33. There needs to be an exact definition of what sound level outside the facility is deemed acceptable. To be fair, the range should not be required to keep sound generation below the level stipulated for automobile exhaust systems as defined by the California Vehicle Code, as measured at the entrance on Orange Street. The standard should reflect the industrial nature of the area [*As stated in the Regulatory Compliance section of the EA, no laws or regulations are known to apply that would raise conformance issues related to the existence of this facility. This includes conformance issues relating to off-site noise. The EA, however, analyzes nuisance noise that is subjective and not conducive to establishing quantifiable limits. In addition, the size of the area affected is dependant on a number of variables as discussed in the EA.*]
34. The rough nature of the ground at the rifle/handgun range already attenuates sound much better than a smooth, finished floor would. [*The EA, Agency Preferred Alternative, describes use of sound absorbing flooring as a means of decreasing the off-site noise levels from the rifle/handgun range; there is no reference to smooth, finished flooring.*]
35. The agency preferred alternative does nothing to address the noise impacts generated on Wednesday evenings from the shotgun range [*A statement was added to the Noise Impacts section, Agency Preferred Alternative, reflecting this comment*].
36. As the agency preferred alternative only restricts use on Sunday mornings, it would not provide for the more significant periods of noise relief needed in the surrounding communities [*Implementing effective sound attenuating measures at the rifle/handgun range, under the Agency Preferred Alternative, would provide noise relief to affected residential areas. However, a statement was added to the Noise Impacts section, Agency Preferred Alternative, clarifying the remaining level of noise impact*].
37. Gun noise from both the shotgun and rifle/handgun ranges is significant throughout the lower end of the Highlands Ranch and Village Lakes residential areas and the older homes located just east of the range. The noise impact is felt at least a mile away to the Highland Avenue area [*Off-site noise impacts are identified in the Impacts section of the EA for all alternatives; statements were added to the EA identifying the Highlands Ranch and Village Lakes residential areas as being affected.*]
38. The agency preferred alternative only calls for closing the shotgun range until 9:30am on Sundays; based on noise impacts from both ranges, both ranges should be closed at this time [*Implementing effective sound attenuating measures at the rifle/handgun range would substantially decrease the annoyance sound levels emanating from this range during the early morning hours of Sunday. A statement was added to the noise impacts section of the Agency Preferred Alternative reflecting this comment*].

39. Both ranges should be closed every other Sunday and have limited major holiday operation to give residents time to gather and visit with family and friends with the noise [*These hours of operation were identified and analyzed in the Environmental Constraints Alternative*].
40. Magnum and hi-base shotgun loads should not be permitted at the range as they are considerably louder and not necessary for sport shooting of clay targets. [*Magnum and hi-base shotgun loads are used very infrequently at the range. In addition, reloading of ammunition would make this requirement difficult to enforce.*]
41. How would sound attenuating measures be implemented and who would monitor if they are sufficient at reducing the noise? There has to be a measurable reduction in the gunfire noise and there must be defined requirements that have to be achieved [*In implementing a lease renewal, the BLM, as standard practice, would require implementation of an approved plan for noise attenuating measure. Non-performance relating to lease stipulations could result in termination of the lease under the applicable regulations. As stated in the Regulatory Compliance section of the EA, no laws or regulations are known to apply that would raise conformance issues related to the existence of this facility. This includes conformance issues relating to off-site noise. For this reason, no measurable reduction standards were developed*].
42. The City of Highland is presently revising the General Plan and substantially more growth and development in the area is envisioned to occur. Limiting the lease to five years would provide an opportunity to address the compatibility of the shooting range with new and future uses of adjacent lands. [*A statement reflecting future growth and development of the area surrounding the range was added to the Affected Environment section of the EA, under Area Description. The five year lease option was identified in the Environmental Constraints alternative.*]
43. No actual off-site noise decibel data is provided in the EA. Local resident considers that the noise from the range exceeds 90 decibels at his home. Was a noise study performed and do the existing levels exceed federal noise guidelines? [*As stated in the Regulatory Compliance section of the EA, no laws or regulations are known to apply that would raise conformance issues related to the existence of this facility. This includes conformance issues relating to off-site noise. The EA, however, analyzes nuisance noise that is subjective and not conducive to establishing quantifiable limits. In addition, the size of the area affected is dependant on a number of variables as discussed in the EA.*]
44. The impacts on shooters of reducing range hours can be mitigated by a more efficient use of the range and by use of the Redlands Trap and Skeet Range, located a mile to the south. [*The Redlands Trap and Skeet facility was not discussed since use at this facility is changing and uncertain*].
45. As shooting has been determined to start accidental fires, this range is needed as an alternative to people shooting in rural/wildland areas that are subject to wildfires [*The EA, Recreation Sections, discussed that the need for this shooting facility has increased in recent years as other shooting ranges are closed and as*

shooting restrictions are implemented in the national forest and public lands within Southern California.]

46. Sound attenuating measures identified in the agency preferred alternative should not apply to rimfire rifles and handguns as their ammunition is very low velocity and causes lower noise levels [*In order to be effective in reducing off-site noise, the rifle/handgun range would need to be designed to handle all types of ammunition*].
47. Requiring sound attenuating measures under the agency preferred alternative would be financially infeasible for IG&G [*costs of mitigation discussed in the EA, Impacts Section for the Agency Preferred Alternative-Land Use Compatibility*].
48. Reducing shooting hours in early morning hours requires shooters to deal with higher and more uncomfortable temperatures [*A statement was added to the Impacts section, under Recreation, for the Agency Preferred and Environmental Constraints Alternatives*].
49. Some local residents affected by the noise generated by the range considered the IG&G Range to be a very important neighborhood amenity when making the decision to purchase their home in this area [*Although this may be a factor in an ultimate decision, it is not an issue analyzed in an environmental assessment under the National Environmental Policy Act*].
50. Home owners in the affected area were given notice of the operation of the shooting range by means of the recorded Notices of Covenants, Conditions and Restrictions on their properties [*Although this may be a factor in an ultimate decision, it is not an issue analyzed in an environmental assessment under the National Environmental Policy Act*].
51. The Wednesday evening trap league requires a block of two hours necessitating the present hours of operation [*All alternatives, including the Environmental Constraints Alternative allow for a minimum two hours of operation for the Wednesday night shotgun range*].
52. This range is unique in Southern California in that it offers the range of shooting sports including trap, skeet and sporting clays and a 25, 50, 100 and 200 yard rifle/handgun range [*A description of the facility is provided in the Affected Environment section of the EA, including the 200 yard rifle range*].
53. A twenty year lease is necessary to allow the club to continue facility improvements, especially those that increase the level of safety at the range [*Statements reflecting this comment were added to the Recreation Impacts sections of the Environmental Constraints and Agency Preferred Alternatives*].
54. In the agency preferred alternative, hours of operation should be extended until 6:00pm on Sundays to accommodate for the decrease in the morning hours. Also, with implementation of sound attenuating measures at the rifle/handgun range, hours of operation at this range could be extended from 5:00pm to sunset without an additional noise impact on local residents [*Extending the hours of operation was not proposed in the lease renewal application. In addition, extending hours would have noise annoyance implications*].
55. Children attending classes at two elementary, one middle and one high school are required to hear gunfire during the school day with continuation of this range [*The*

- location of and impacts to schools in the vicinity of the range was discussed in the EA in the Affected Environment and Impacts sections of the EA).*
56. The agency preferred alternative does not require any sound attenuating measures at the shotgun range and there is no provision for enforcement of any of the identified requirements [*Very few options exist to lessen the noise emanating from the shotgun range as is discussed in the Proposed Mitigation Measures section of the EA. All adopted mitigation measures would be incorporated into the lease as stipulations and are, therefore, enforceable.*]
 57. Restricting hours of operation on Sundays is favoring one religion over another and, therefore, is directly opposed to the Constitution of the United States [*Restricting hours of operation on Sundays, under the Agency Preferred Alternative, is based on mitigating off-site noise annoyance impacts during identified periods of higher sensitivity to annoyance noise among the general population*].
 58. This range is unique in the region in accommodating physically handicapped shooters; closing or restricting the range would impact these users [*A statement to this effect was added to the Recreation Impacts section of the No Action Alternative*].
 59. Local residents can reduce their exposure to nuisance noise by use of measures such as building fences, planting vegetation, and installing dual pane windows [*The effect of vegetation and structures on noise levels is discussed in the Noise Impacts section of the Proposed Action Alternative*].
 60. The gun noise from the range makes it difficult to sleep on weekends. In addition, some local residents have had to get rid of their pets after moving to the East Highlands Ranch due to their inability to adjust to the noise [*The impact of nuisance noise was discussed in detail in the EA, Impacts section*].
 61. The impact of the noise within the adjacent residential areas is more pronounced as it bounces off the mountains [*The effect of terrain on noise levels is discussed in the Noise Impacts section of the Proposed Action Alternative.*]