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Decision Notice for
Great Falls Shooting Sports Complex
Environmental Assessment

Montana Fish, Wildlife & Parks (FWP) released a draft Environmental Assessment (EA) on February 1, 2010 for review and public comments regarding a proposal to provide $13,500 in partial funding through the Shooting Range Development Grant program towards improving the 300-yard range on the Great Falls Shooting Sports Complex (GFSSC). This project will re-grade the floor of the existing 300 yard range to limit erosion and increase berm heights. To accomplish this, the range floor will be "stepped" in 100 yard increments that will allow all shooting positions to fire safely at 100 yd., 200 yd., and 300 yd. targets. The construction will also help decrease the steep angle of the range floor. Construction will involve relocating approximately 7,500 yards of dirt. This dirt will be used to increase the heights of the side berms, and for construction of an access road along the perimeter of the range to the target backers. The re-adjusted range layout will also require moving the firing line about 10 yards back (to the South) from the targets, as currently only 4 benches line up with each target backer at all distances. Concrete access ways will be constructed to connect the parking lot with two concrete shooting pads providing handicapped accessibility. Both the road and parking area are to be graveled. All disturbed areas will be reseeded to further reduce erosion. The deadline for comment was February 19, 2010.

Background

The Shooting Sports Complex is located three miles north of Great Falls, Montana. The range complex is located off Ryan Dam Road. Formerly the Beckman property with Black Horse Butte on the north edge of the property, known locally as Radio Tower Hill from the microwave relay towers on top. The complex is 942.37 acres, 582.37 are owned by Montana Fish, Wildlife & Parks (Township 21 North, Range 4 East, M.P.M. Section 15: NW¼; Section 16: NE¼, E½NW¼, N½S½, SW¼SW1/4) and the remaining 360 acres are owned by GFSSC (Township 21 North, Range 4 East, M.P.M. Section 15: NE ¼; Section 16: SE¼SW¼, S½SE¼, W½NW¼).

The Draft EA was posted on FWP's web site on 2/1/10 for a 19-day comment period and a news release was distributed on February 2, 2010 from FWP's Great Falls Regional office; a legal ad was posted in the Helena Independent Record on 2/6/10 and a TV interview with the FWP Regional Information Officer was aired on KRTV on 2/5/10.

Summary of Public Comments

FWP received 13 comments to this EA. Six were in support of Alternative A and 7 questioned specific aspects of the project. FWP received a comment from the Montana Historical Preservation Office (SHPO) acknowledging that cultural resources would not be impacted by this project.

The following comments addressed modifying the proposed course of action to make the 300 yard range more accessible by constructing a path in the center of the range allowing wheel chair or walking accessibility.

Comment*: I could not find a better spot on the web page. It is my understanding that part of the Grant is to build a road so handicapped shooters can "drive" to check their targets. I think this should be changed to: "a properly designed gravel or asphalt walk way from the shooting tables to the target backers should be built down the middle of the range with branches to the left and right at the target backers." This range is built on the best gumbo dirt that Montana has to offer. This walk way would provide accessibility for wheel chairs and walkers. Handi-capped and nonhandi-capped would equally benefit. Why do we want to force the handi-capped shooter to get into his vehicle drive down range, get out of the vehicle, get the target, get back into the vehicle, turn the vehicle around, park, get out of the vehicle, and shoot. If it is invisioned that handi-capped shooters are going to shoot from their vehicle then the added height may add a new safety consideration. The handi-cap design does not appear to have been well thought out.*

Comment: *A path leading directly from the shooting benches to the target backers would be a better alternative than a road for the shooters. This will stop the creation of a trail susceptible to erosion from occurring.*

FWP Response: the GFSSC's construction plans meet the American Disabilities Act (ADA) criteria. If the GRSSC board feels this idea would benefit the range and all user groups they would be able to construct the travel route for ADA to the center. This falls within the criteria of the proposed scope of work described in the grant application and EA.

The following comments questioned the proposed project design.

Comment*: TERRACING of the RANGE FLOOR*

*"In paragraph 1 of the funding request, the reason given for this action is to reduce/control erosion. I think we all know grass will grow on terrain much steeper than the **3% grade**, currently present. With this in mind, it seems a waste and not so prudent expenditure of those 'hard to come by' Sportsmans Dollars, in order to terrace the range floor. Even if terraced, there will need to be some grade incorporated, to promote run-off. Diminishing returns comes into play here, making the gain of 1% or 2%, unreasonable to pursue. Cost far exceeds any benefit. Referring to the NRA Range Resource Manuel, page 1-1-14, (sec 3.03.3B), **The NRA calls ideal, a 2% grade to the targets.***

As for the dirt work portion of the request, this should not be funded, as it is a waste of those, you guessed it, 'hard to come by' Sportsmans Dollars and cannot stand on its own merit.

Drill-seed the floor laterally, and broadcast or hydro-seed the berms, as they are. The range is entirely usable as it is, physically. A 3% grade is inconsequential!! It promotes runoff and allows quicker drying of the range floor. Cost-vs-Benefit----please spend our sportsmans dollars responsibly.

FWP Response: Any activities related to construction improvements are required to meet the industry's standardized criteria. Meeting this criteria is a condition of the lease between FWP and GFSSC. The NRA Range Manual is the standard for range construction and the proposed project falls within NRA recommended slopes of a range floor.

Comment: *If possible, I would like to see the shooting benches allocated as follows:*
1. 6 benches to align with the 100 yard backstop.
2. 4 benches to align with both the 25 yard and 50 yard Backstops.
3. 3 benches to align with the 200 yard Backstop and 3 benches to align with the 300 yard Backstop.

FWP Response: This comment will be forwarded on to the GFSSC.

Comment: *One aspect of the revised request puzzles me, and that is the necessity of moving the benches back 30'. There is apparently something else in the mix here, but it is not fully explained in the revised funding request……*

FWP Response: Moving the benches (shooting line) back from the targets will compensate for the addition of the perimeter road that will shorten the current length of the 300 yard range. Moving the firing line back will also realign the range so each shooting bench is directly in front of the targets at 100, 200, and 300 yards.

Comment: *As to the terracing of the 300-yard range floor, I am opposed to this action. It is not necessary as a 3% grade is quite acceptable, and, if properly maintained, erosion and weeds will not be a problem. In that context, as stated in the original Lease Agreement, "The lessee is responsible for maintenance and weed control except in the areas leased for farming." This Lessee, Missouri River Shooters' Association, is in violation of the governing Lease Agreement.*"

FWP Response: Any activities related to construction improvements are required to meet the industry's standardized criteria. Meeting this criteria is a condition of the lease between FWP and GFSSC. The GFSSC will contract with the county weed control officer to mange weeds on the range.

Comment: addressed safety **"***I understand, the dirt removed would be used to enhance the side berms, but is this really a safety issue for rounds leaving the range, or is this an effort to address safety issues which may arise due to concurrent usage with the Silhouette Range?"*

FWP Response: The GFSSC Board has recommended heightening the side berms to prevent the potential escape of rounds from the range. The fact that the silhouette range now runs parallel to the west side of the 300 yard range provides additional rational to increase the height of that berm. The lease agreement between FWP and GFSSC requires GFSSC to be responsible for

safety on the range and to carry liability insurance for the range. FWP will concur GFSSC's safety recommendation. The suggestion of closing one range while the other is in operation will be passed on the GFSSC.

Comment: "*The modified request is the same as the original grant request. The original request for this work was $22,000. The new request for the same work is $27,000. No explanation of the difference in cost was addressed.*

FWP Response: The original GFSSC project budget requested $22,000 from the Montana Shooting Range Grant program (1 to 1 match as per program rules) of shooting range grant dollars; thus the total project budget was $44,000. The new budget of $27,000 is the total amount projected for the revised project; thus, the GFSSC requested $13,500 from the Montana Shooting Range Grant program.

Comment: *All of the required information required was not presented. No proof of insurance: (Insurance policies must be submitted, Provide proof of general liability for volunteers).*

FWP Response: The person providing the comments was contacted as to the availability to view the sensitive documents at FWP's Region 4 office.

Comment: *A list of previous donations was presented but this does not show matching funds, dollar for dollar as required.*
As per the Grant application (III Budget), the supplied info does not meet the requirements of a complete detailed budget worksheet. Your Example of a proposed budget does not follow the requirements of a complete detailed budget worksheet.
The original worksheet provides by the GFSSC does not show 50% matching funds.

FWP Response: *the budget was discussed verbally with GFSSC.*

Comment: *This proposal is on leased land and follows under the lease agreement.*
Appendix B Lease Agreement: #7: No development or physical improvements may be constructed without the prior written approval of lessors' liaison. There wasn't a letter presented that says this was project was approved.) No development or physical improvements may be constructed without the prior written approval of lessors' liaison. There wasn't a letter presented that says this was project was approved.

FWP Response: The FWP Region 4 Supervisor approved the new proposal through an e-mail after the GFSSC Board meeting on January 5th.

Comment: *Any development of improvements shall be done in accordance with the standards set by appropriate industries, such as the National Rifle Association and Montana State building Codes.) The letter should be required for Grant application."*

FWP Response*:* Comment is so noted.

Three comments expressed concern over spending grant dollars on the private part of the range and not the public part:

FWP Response: the lease between FWP and the GFSSC allows the board to act on behalf of the complex and submit grants to benefit the entire range. Also the GFSSC has offered to open the 300 yard range as part of the Public Range once a month, weather permitting.
By rule a private shooting club is eligible for grant funds:
To be eligible for grant assistance, a private shooting club or a private organization:

(a)(i)shall accept in its membership any person who holds or is eligible to hold a Montana hunting license and who pays club or organization membership fees;
(ii)may not limit the number of members;
(iii)may charge a membership fee not greater than the per-member share of the club's or organization's reasonable cost of provision of services, including establishment, improvement, and maintenance of shooting facilities and other membership services; and
(iv)shall offer members occasional guest privileges at no cost to the member or invited guest and shall make a reasonable effort to hold a public sight-in day each September, when the general public may use the shooting range for a day-use fee or at no cost; or
(b) shall admit the general public for a reasonable day-use fee.

Several Comments were made about the lack of handicap accessibility on the 200 and 50 yard ranges.

FWP Response: These comments directed at the 50 and 200 yard ranges are outside of the scope of this project; however, FWP acknowledges these comments and will pass them on to the GFSSC. The GFSSC board has offered to open the 300 range one day a month during periods of good weather like they do the other "Public Ranges" (50 & 200yard).

Decision

Based on public comment and internal review, it is my decision to proceed with preferred alternative A, to modify the 300 yard range. FWP will grant the GFSSC $13,000 in partial funding for this proposed project, pending the GFSSC's completion of other administrative requirements under the Shooting Range Development Program.

_____ Date:_____

Regional Supervisor
FWP Great Falls
Gary Bertellotti