



September 1, 2017

Jeff Bensen  
Los Padres National Forest  
6750 Navigator Way  
Goleta, CA 93117  
jbensen@fs.fed.us

RE: Winchester Canyon Gun Club Special Use Permit Scoping

Dear Mr. Bensen:

Thank you for this opportunity to submit comments on the issuance of a temporary Special Use Permit ("SUP") for the operation of the Winchester Canyon Gun Club ("WCGC") on W. Camino Cielo Road in the Los Padres National Forest ("LPNF"). Below are our comments regarding this proposal.

### **1. Lead-free Ammunition**

The Proposed Action states that lead ammunition may not be used at the shotgun trap, skeet, and sporting clay ranges. We strongly support this prohibition of lead ammunition at these ranges. We would also support an alternative that prohibited lead ammunition at all of the WCGC's ranges. As the site is in the headwaters of Bear Creek, Ellwood Canyon, and San Jose Creek, runoff from the WCGC can have an impact on water quality in downstream areas of the LPNF and urban areas such as Goleta and Santa Barbara. Lead contamination of soil in and around the gun range has the potential to contaminate runoff and groundwater that can consequently affect watersheds downstream.

### **2. Environmental Review for Long-term SUP Progress**

The WCGC has been operating on LPNF land under various SUPs since 1969. Research into past issuances of permits and analyses of environmental impacts of the WCGC have revealed that any environmental analysis associated with this SUP has been mired with delays and other problems.

In brief, an environmental analysis has either been in the scoping process or under development since at least 1995. An Environmental Analysis ("EA") for issuance of a long-term SUP to the WCGC was developed between 2002 and 2007 and even completed before being appealed and overturned by a coalition seeking to protect nearby sites of cultural significance to Chumash peoples. The process to develop an Environmental Impact Statement ("EIS") was

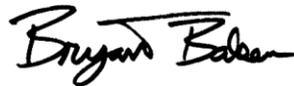
then started in 2009 before being delayed until 2012, when the notice of intent for the environmental review was reissued.

Due to these many delays in conducting an appropriate environmental review for the long-term use of the WCGC on LPNF land, recurring one-year temporary SUPs have been issued to the gun club since at least 2005. Every temporary SUP has been issued without any environmental review due to categorical exclusions invoked by the Forest Service. This may not be an intentional effort to avoid conducting environmental review, but the repeated use of categorically-excluded temporary permits for the WCGC is becoming problematic. Public involvement in determining if and how the WCGC is permitted to operate on national forest land has been limited to commenting on scoping notices preceding issuance of a temporary permit that, while not being altered from previous permits, is not subjected to further review and public comment.

Moreover, environmental impacts of the WCGC should be reevaluated periodically to determine whether existing operational practices are safe for the surrounding land, wildlife, and water quality. Since the EA finalized in 2007 was overturned on an appeal, there has been no environmental review of use of the WCGC since it was issued its last long-term SUP in either the 1970s or 1980s. A lapse in appropriate environmental review over a period of 30 years or more is simply unacceptable. As part of this process to once again issue a categorically-excluded temporary SUP, we would like to be made aware of the progress of the EIS that has been under development for over eight years.

Thank you for this opportunity to provide comments on this proposal. Please provide us with all future public notices, environmental documents, and decision documents related to permits being considered for the WCGC.

Sincerely,

A handwritten signature in black ink that reads "Bryant Baker". The signature is written in a cursive, slightly slanted style.

Bryant Baker  
Conservation Director  
Los Padres ForestWatch