

COUNTY OF SUFFOLK



COUNTY LEGISLATURE

KATE BROWNING
County Legislator, 3rd District

Health and Human Services, Chair

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March 18, 2009

Honorable Steve Levy
Suffolk County Executive
H. Lee Dennison Bldg.
P.O. Box 6100
Hauppauge, NY 11788

Timothy Laube
Clerk of the Legislature
William H. Rogers Bldg.
725 Veterans Memorial Highway
Smithtown, NY 11787

Re: Resolution 1231-06
Trap and Skeet Search Committee Report

Dear Mr. Levy and Mr. Laube:

In accordance with the referenced resolution, a report recommending alternative sites for Suffolk County's Trap and Skeet Facility in Southaven Park has been prepared. All required tasks have been completed with the recommendations outlining the appropriate alternative locations to relocate the trap and skeet range. The general conclusion is that such a relocation effort is feasible and beneficial, but additional research by Suffolk County's Department of Planning and Department of Parks and Recreation is needed to pursue these recommendations. After your review, I am available to meet at your convenience to discuss the report.

As required by the resolution, Mr. Laube is to distribute the report to all Legislators.

Sincerely,


Kate Browning, Legislator
Third Legislative District
Suffolk County Legislature

KMB/js

Trap and Skeet Search Committee Report

Submitted: March 2009

Introduction - This report has been prepared in accordance with Resolution 1231-2006, which created the Trap and Skeet Search Committee. This committee included representatives from the sporting community, environmental community, county legislature, county executive, and a member of the community adjacent to the current Suffolk County Trap and Skeet Range at Southaven Park. The appointed members for this committee were Joe Olsen, John Cushman, Jean Mannhaupt, George Proios, Legislator Kate Browning, Todd Stebbins, Christopher Kent, and Johan McConnell.

The Trap and Skeet Search Committee was created as an exploratory committee to search for and identify alternative locations for the Suffolk County Trap and Skeet Facility.

Although the County's Trap and Skeet Range continues to operate at Southaven County Park, the Search Committee was given the task of analyzing the current location and identifying if there could be appropriate alternative locations for the continuing operation of a County Trap and Skeet Facility. The County's Trap and Skeet Shooting Range is located in the environmentally sensitive Carmans River Watershed in the Core Preservation Area of the Long Island Pine Barrens, and in a state-designated Special Groundwater Protection Area. Also, the Trap and Skeet Shooting Range is located in very close proximity to a residential area; and an alternative site should be identified by the County for a trap and skeet shooting range to accommodate shooting enthusiasts.

On June 7, 2007, Chairperson, Legislator Kate Browning, held the initial meeting of the newly formed "Trap and Skeet Search Committee". The Search Committee's intentions were established at this meeting as follows:

- Review all current operating trap and skeet facilities throughout Suffolk County.
- Identify possible suitable alternative locations to relocate the County's Trap and Skeet Facility currently operating at Southaven Park.
- Avoid any proposed alternative locations that could negatively impact an existing residential community.
- Consider public highway access to any proposed alternative site for all residents of Suffolk County.
- Attempt to evaluate the most cost effective relocation effort for the taxpayers of Suffolk County.
- Consider environmental impacts that might be experienced if the facility was relocated to an alternative site.

Over the course of eighteen months, the committee performed an on-site tour of the County's Trap and Skeet Facility at Southaven Park, researched Suffolk County owned properties in excess of 75 acres, reviewed several large tracts of open space in Suffolk County, analyzed existing trap and skeet facilities, and conducted a search of several mining facilities in Suffolk County. The diverse committee spoke at length about each and every one of these properties, and the feasibility of relocating the County's Trap and Skeet Facility to one of the proposed sites. The committee spoke at length with the Director of Suffolk County's Department of Planning, Thomas Isles, and representatives of Suffolk County's Parks Department, regarding the applicable zoning, current and future potential for development of the identified parcels, and the impact of development upon adjacent parcels. In addition, environmental

considerations for targeted properties, the vehicular accessibility to these parcels, and any proposed development of surrounding properties were reviewed.

The findings and recommendations of the Trap and Skeet Search Committee are hereby respectfully submitted. It is the committee's belief that implementation of the recommendations as outlined within this report should be considered the foundation to determine a potential site for the relocation of the County's Trap and Skeet Facility.

These recommendations relate to:

1. Contacting owners of proposed locations to determine if there is interest to operate a facility of this type, or willingness to sell property to the county for that purpose.
2. Identify and characterize the potential impacts upon surrounding communities in areas that were identified by the committee as alternative sites to relocate the County's Trap and Skeet Facility.
3. Evaluate and determine fiscally responsible costs associated with the relocation of the facility to any recommended potential alternative sites.
4. Upon relocation, there should be full restoration of the current trap and skeet facility at Southaven Park to park like conditions for the enjoyment of all residents of Suffolk County.

Respectfully submitted,

Honorable Kate Browning
Suffolk County Legislator
Third Legislative District

Christopher Kent, Director
Suffolk County Department of Environment and Energy
Division of Property Acquisition and Management

George Proios, Chief Environmental Analyst
Suffolk County Department of Recycling and Waste Management

Todd Stebbins
Suffolk County Department of Environment and Energy
Senior Energy Coordinator

John L. Cushman, President
Sportsmen's Association of Firearms Education

Joseph Olsen
Suffolk County Resident
Active Sportsman

Johan McConnell, President
South Yaphank Civic Association

Jean Mannhaupt, Activist
Environmental Background

Trap and Skeet Search Committee Relocation Review Process

Conducted 6/7/07 through 12/10/08

Location Issues

A. Noise

Trap and Skeet facilities are exempt from county noise ordinances pursuant to Local Law No. 18-2003, but there is current litigation relating to violations of the Brookhaven Town noise ordinance. Any future site must have sufficient buffer area so that noise emanating from the site will be below the limit allowed under the code of the town within which the facility is located. Residential development in surrounding areas must not have to tolerate noise from the facility in excess of local noise ordinances, and any residential zoning must be taken into consideration in order to avoid similar problems that arose in Yaphank.

B. Accessibility

The current Trap and Skeet Facility is located minutes off of Sunrise Highway in Yaphank. Exits 57 and 58 provide easy access to the park and it also has close access from Exit 67 of the Long Island Expressway. Any new site would have to provide accessibility from major roadways in Suffolk County. The sporting community already has limited options, so a centrally located facility would be most beneficial to the county and its residents.

C. Environment

Most of Suffolk County's available open space is located within the Central Pine Barrens of Suffolk County; either in the Core Preservation Area (CPA) or the Compatible Growth Area (CGA). Suffolk County's Trap and Skeet Facility is currently located in the core preservation area of the Central Pine Barrens. The CPA has very strict guidelines and limited development potential, and it would be difficult to relocate the trap and skeet facility to a site within the CPA. The CGA offers flexibility in accommodating the relocation of the facility. All sites being considered would have to take this into consideration.

D. Size

The Trap and Skeet Range in Yaphank is approximately 60 acres with 43 acres being utilized for shooting range activities. It has concessions and a clubhouse, as well as twenty-four fields for recreational shooting. Relocation of the facility would require the construction of new, additional, or rehabilitated facilities to meet the minimum requirements of the operation of a county facility. Any alternate facility should be a minimum of 100 acres. This would allow for trap and skeet as well as sporting clays to be located within the facility as exists at the Southaven Park Facility. Anything less than 100 acres would result in an insufficient buffer for the relocation from the current range. Moving the site should maintain the current size and use or allow for expansion, if possible. In order to minimize the potential impacts of the shooting range on any surrounding residential area, there should be at least a 1,800 foot buffer area surrounding the facility.

Observed Locations

1) Brookhaven Shooting Range, Ridge, NY

Background: Tax Map # 200-296-1-1.2. This facility is currently being leased from the Town of Brookhaven under a 20-year agreement that was signed in 1997. A private vendor is running the site and paying a franchise fee every year. The entire parcel is 500 acres. It is currently operating as a trap and skeet, rifle and pistol range, as well as an archery range. Archery is set up upon request and can be utilized from 20 or 40 yards, as well as simulated 9 foot tree stands. Sporting clays did exist at one time but were discontinued due to a lack of space at the facility. The entire 500 acres is not being utilized as a shooting range, so there is room to expand and absorb the Suffolk Trap and Skeet Facility. This facility is open to all county residents, but it costs more for those residing outside of the Town of Brookhaven.

Committee Consensus Findings: Worth further examination

Although the site is large enough to meet the needs of co-locating the County and Town facilities with room to expand, under the current agreement with the Town, the vendor does not have the right to absorb the Suffolk County Trap and Skeet Facility. An agreement would have to be worked out between the Town and County. Also, the Brookhaven Range already has been brought to court for unauthorized clearing of land because they were expanding beyond their original footprint. The site is in the Core Pine Barrens Preservation Area, which would require a hardship approval from The Pine Barrens Commission. It would also require approval from the NYS Department of Environmental Conservation. The Suffolk County Trap and Skeet has a total of 24 trap, skeet, and sporting clay fields, while the Brookhaven Range has only 12 trap and skeet fields. The expansion required would need to be about 40-50% from the current operation to meet current county services, and along with recent court decisions would make this relocation effort difficult unless New York State DEC supported the relocation. Also, the Town would have to amend their fees to allow all County residents to use the site at an agreed upon price. Expansion of the site may be favorable due to the public benefit of closing the County range at Southaven Park, which is also within the CPA.

2) Schmeltzer Shooting Range, Calverton, NY

Back Ground: Tax Map # 200-300-1-4, 5.3, and 6. This disturbed site is 3 tax map parcels totaling approximately 146 acres surrounded by county owned property minutes from Exit 71 of the Long Island Expressway. The site currently operates as a private shooting range on one of the parcels. A second parcel is a sand mining facility, and the third contains POD's. The private property would have to be purchased or leased from the owner in order to operate as a county facility. The site is located in the Core Preservation Area and would require the approval of the Pine Barrens Commission.

Committee Consensus Findings: Worth further examination

This already disturbed site is worth further examination and consideration as a potential site to relocate the County Facility. Since it is already being utilized for the same purpose, transition to a county facility would be feasible with a willing owner. The cost of the purchase could be offset by stripping the site of its pine barrens credits, which could be given to the owner and subsequently lower the purchase price of the property. Out of all the private parcels reviewed, this is the most suitable alternative site for relocation of the County's facility.

3) Old Police Academy, Westhampton, NY

Background: This site was formerly used as the old the Suffolk County Police Department Academy, which also had a gun range next to it. It is located next to an abandoned drag strip in Westhampton and is owned by the county. This facility was closed down due to officers testing positive for lead. The lead contamination was never fully remediated.

Committee Consensus Findings: Rejected

The committee determined this would not be a good site because the former firing range was not large enough for the County's trap and skeet facility. A combination of properties would be needed. This is not possible because Pulte Homes purchased the former drag strip property and has approval for 187 housing units there. Not only would this make it impossible to acquire enough land, but also relocating the facility to this site would negatively impact any new homes constructed in the area.

4) Navy Weapons Industrial Reserve Plant, Calverton, NY

Background: This site is part of the 2900 acre parcel transferred by the Navy to the Town of Riverhead that was formerly used by Grumman for flight-testing. The site contains three parcels retained by the Navy for remediation. Once the three parcels are fully cleaned, they will be transferred to the Town of Riverhead for any use the town chooses. The first parcel is an old fire training facility that is approximately 30 acres, and is in the recreationally zoned portion of the property as well as within New York States Wild Scenic Recreational River Boundary.

The second site is 144 acres, zoned office complex, and has frontage on Route 25. This use to be the site of an old landfill, and is restricted by the presence of two ponds which have been documented as Eastern Tiger Salamander breeding habitats in the middle of the parcel. The third parcel is 165 acres, zoned industrial, fronts Grumman Boulevard, and is completely wooded.

Committee Consensus Findings: Rejected

Based upon the size, zoning and presence of protected species, this site is not appropriate for consideration as a potential site for the relocation of the County's Trap and Skeet Facility.

5) Gabreski Airport (Tuccio Property), Westhampton

Background: This property has a private gun range, which is leased by the Tuccio Family who previously owned the entire airport property, but now only own land on the northern portion of the area. This private range was an old military training facility, which was used to train rescue teams. Now it is leased to a private vendor who runs a range with various activities.

Committee Consensus Findings : Rejected

6) North Fork Preserve

Background: This is two parcels totaling 305 acres on Sound Avenue in the Town of Riverhead. The property is on both Suffolk County's Master List as well as Riverhead's list for open space preservation. This would make it very easy to initiate the purchase process. The owners of the property have expressed interest in selling the land to the County, but this is in its infant stages, and would be at least two years away from becoming finalized. The parcel already has a clubhouse located on it, which had been used for a private gun range and hunting preserve in the past. The adjacent properties to the east and west of the location cannot be developed because Suffolk County owns the development rights. The northern portion of the parcel, which consists of 133 acres, is wetlands, which would be preserved if any purchase was to take place. The remaining 172 acres could be used for a trap and skeet facility in conjunction with the possible continued operation of a hunting preserve. Sound Avenue is to the south of the property where there is a residential development across from the parcel. The location of the property is not easily accessible to most county residents.

Committee Consensus Findings: Worth further consideration

The committee doesn't think this would be a viable location because it does not meet the accessibility requirements. Although the property has a very large buffer area that would never be developed, and a gun range has already been successfully run on site, it would be difficult for most Suffolk County residents to access it. There are no major roadways to the site, and it would not be easily accessible for non Suffolk County and western Suffolk County residents. In addition, it could be years before any purchase is possible. If a purchase materialized at a later date and the Trap and Skeet has not been relocated this can be revisited.

7) Shirley Industrial Park, Shirley

Background: This site is adjacent to the south service road of the Long Island Expressways just east of Exit 68, William Floyd Parkway in Shirley. It is approximately 45 acres when combining seven parcels in the park. These have various owners and would need to be assembled. There is a residential community to the southeast of the industrial park.

Committee Consensus Findings: Rejected

The committee found that the entire 45 acres would need to be utilized in order to have a Trap and Skeet on the site. This would leave minimal space for a buffer area, which would not protect the residential community to the southeast from the negative impacts of relocating the facility to this site. Although accessibility to the location would be acceptable and there would be minimal environmental factors, the size of the parcel would not be sufficient, and there are no solutions for the noise impacts to the surrounding community. Therefore this location would not be a viable choice to relocate the Trap and Skeet.

8) AVR Reality Property, Manorville

Background: This parcel totals 444 acres and is located just south of the Long Island Expressway in Manorville between Exits 68 and 69. It is zoned industrial and currently has no development on it. The site is northeast of and in close proximity to Brookhaven's Calabro Airport, but wouldn't conflict with any operations there. The entire 444 acres are on Suffolk County's Master List for open space

preservation. The owner, AVR Reality, has sold property to the county in the past and has not submitted any plans to develop the property. There is a residential community to the west, the Long Island Expressway to the north, industrial and residential zoning to the east, and Moriches Middle Island Road to the south. This property is also located in the compatible growth area of the Pine Barrens.

Committee Consensus Findings: Worth further examination

The committee found that this may be the most viable location looked at because it is large enough to place a trap and skeet range, and also provided a good buffer to any residential communities in the area. Access to the site could be enhanced with minimal road improvements, and its close vicinity to the Long Island Expressway could be utilized. Since it is already on the county's master list any purchase of the property could be pursued easily. The remaining acreage could either be preserved or possibly used for other recreational needs the county may have. Placement of the range on this parcel would most likely be best on the northeastern portion because of the industrial zoning in that area and the expressway to the north.

9) Sand Mines and Gravel Pits

Overview

These sites are good candidates for a Trap and Skeet location because most of the land has already been cleared or disturbed, and the state mining permits require the current owners to propose reclamation of the sites. It may be economically beneficial for mining operators to sell to the county as their reclamation rather than spending money to do it themselves. Also, because these sites have been excavated as part of the mining process, the sites are below the surrounding grade level providing a natural noise buffer if a Trap and Skeet Facility is located in this man made hole.

A. Westhampton Mining Aggregates, Westhampton

Background: Site is located off of Country Road north of the railroad tracks. It lies in the Core Preservation Area of the Pine Barrens and is a total of 37 acres. All of the mines' reserves have been exhausted and reclamation is scheduled to be completed in July 2008.

Committee Consensus Findings: Rejected

This would not be a viable site because it is not big enough to accommodate the Trap and Skeet Facility currently located in Yaphank. Also, reclamation has already begun, so any negotiations have already taken place.

B. Westhampton Property Associates (Formerly Huntington Ready Mix), Speonk

Background: Site is on the east side of Riverhead Speonk Road south of Sunrise Highway. Part of the site is in the Core Preservation Area as well as the Compatible Growth Area. The property is a total of 115 acres with 91 acres permitted for mining. The mining permit expires in July 2011.

Committee Consensus Findings: Worth Further Examination

Perhaps this site can be revisited in 2010 to see if the mining permit will be re-issued, but for now it leaves the committee with a negative consensus on its viability.

C. Huntington Ready Mix, Speonk

Background: The property is on the east side of Riverhead Speonk Road south of Sunrise Highway. It is located on the left side of the entrance road to Huntington Ready Mix. This lies totally in the Core Preservation Area of the Pine Barrens. It is 35 acres with only 13.5 acres permitted to be mined. The current permit is due to expire in October 2009 and could be exhausted of its reserves at that time.

Committee Consensus Findings: Rejected

This site is only 35 acres and would not meet the required acreage to relocate the Trap and Skeet there. The committee didn't look into this site any further due to its small size.

D. East Coast Mines, East Quogue

Background: Site is located on the north side of Lewis Road south of Sunrise Highway. It is in both the Core Preservation Area and the Compatible Growth Area. It is a total of 145 acres with approximately 75 acres permitted to be mined. The current permitted area does not have any Core Preservation Area that is not disturbed. The permit expires in October 2010.

Committee Consensus Findings: Worth future consideration

Although this site meets criteria for size and noise, it is predicted that the owner will renew their permits to continue mining because there will be a substantial amount of reserves remaining to be mined. Since there is no clear time frame for when reserves will be exhausted, or when reclamation will need to take place this is not a viable site at this time.

E. Sand Farm Corporation, East Quogue

Background: Location is on the north side of Lewis Road adjacent to East Coast Mines mentioned previously. The owner of East Coast Mines purchased this mining operation and is not the current owner here as well. This is also in both the CPA and CGA of the Pine Barrens. This site is 59 acres with all 59 acres permitted to be mined. The permit is due to expire in July of 2010.

Committee Consensus Findings: Worth further examination

The size of this parcel may meet the requirements for a Trap and Skeet, however the reserves are still plentiful, and it is predicted that the owner will renew their permits and continue to mine here for an extended period of time. No reclamation will be required until all reserves are exhausted, which does not make this a good option in the near future.

F. Hampton Sand and Gravel, Speonk

Background: This property is located on the West side of Riverhead Speonk Road south of Sunrise Highway. It lies behind a car junkyard off of High Street. The site is totally in the CGA of the Pine Barrens. A total of 110 acres make up the site with 48 acres permitted to be mined. The permit is due to expire in September of 2009 and it may be possible that all reserves will have been used up at that time. However, there is a modification request that could extend the life of mining at the site.

Committee Consensus Findings: Worth further examination

The committee felt this was the most viable mining location to be used for a Trap and Skeet facility. The size of the property is certainly enough to have Trap, Skeet, and Sporting Clays. Most of the site has already been cleared due to the mining there, and any areas not cleared could be used for sporting clays. Currently there is a buffer of open space surrounding the mining operation, but further research showed subdivisions being pursued for residential properties to the east. If this development goes forward the feasibility of placing a Trap and Skeet there would be drastically hindered.

10) County Parcels

Overview

These sites are most suitable for the relocation of a Trap and Skeet facility because no funding is needed to purchase land prior to locating a facility, and the county has jurisdiction over what it chooses to do with its parcels. Fiscal responsibility to Suffolk County taxpayers is the number one priority of the committee when determining alternative sites. Any county land, especially land located outside of the CPA, gives the county the opportunity to transition to a new site without gaining approvals from other levels of government, private individuals and corporations, or the Pine Barrens Commission. The county does own land large enough in size to place a facility, and these parcels were looked at prior to considering other options. The Director of Suffolk County's Planning Department Thomas Isles supplied the committee with a list of all parcels totaling more than 75 acres in the county inventory, which was extensively reviewed. After a complete review, only one parcel met the necessary criteria to be considered.

A) Blydenburg County Park

Background: This parcel is 299 acres and is not located in the CPA. It is centrally located in Suffolk County and has access off of Veterans Memorial Highway, which has direct access to and from the Long Island Expressway and Northern State Parkway. The county complex is located to the west and south of the park. It is located in the NYS Wild, Scenic and Recreational River Corridor of the Nissequogue River, and also contains a 10 acre historic district that is dedicated to the Suffolk Historic Trust, the State Register of Historic Places, and the National Register of Historic Places.

Committee Consensus Findings: Rejected

The historic district is one of the most important resources for the county and any facility would have to be placed far from the historic site. There are several recreational activities that would be affected by a shooting range. These include camping, horseback riding, fishing, boating, hiking, bird watching, dog activities, historic tours, and children's playgrounds. An equestrian area in the park includes corrals and trails throughout the park, and there are two fenced dog runs. These activities are located in the northeastern and eastern quadrants of the park, which is the larger portion of the park. The LI Greenbelt Trail Conference and Suffolk Archaeological Association have contracts with the county for guided hiking tours and outdoor education. The park is also a hot spot for West Nile Virus and has been shut down in the evening, mornings, and nights due to this problem. Because the park is located in the NYS Wild, Scenic and Recreational River Corridor of the Nissequogue River there are restrictions on any new activity and NYS DEC would have to approve these permits. One quarter to one third of the park is also considered freshwater wetlands, which requires a NYS DEC permits for any activity within 100ft. of wetlands.

Note: Many of the arguments for not relocating a facility in Blydenburg Park can be also be affiliated with operating a range in Southaven Park.

Final Recommendations

After extensively researching existing county holdings, current gun ranges, tracts of open space, and sand mining operations throughout Suffolk County, the committee recommends all parcels that are identified as either “worth further examination” or “worth further consideration” should be pursued as alternative locations for Suffolk County’s Trap and Skeet Facility. The county should pursue options for moving the Trap and Skeet in Southaven Park under the following criteria:

- A. Noise:** Current litigation may result in facilities having to abide by noise ordinances within the towns they are located. Brookhaven Town noise ordinances allow sixty-five decibels or less at their property boundary line. The Trap and Skeet Range currently operating in Southaven Park has been recorded as high as ninety-four in the surrounding community. This has resulted in the lawsuit on behalf of the town that is currently in litigation.
- B. Accessibility:** If the site is not easily accessible, it would have a detrimental impact upon the use of the site by county residents, and would negatively impact the sporting community, which already has limited options for recreational shooting. Public access from the Long Island Expressway or Sunrise Highway should be considered the most feasible roads for any alternative facility.
- C. Environment:** Locations that are already developed, have been cleared, or have been permitted to have a shooting range in the past should be considered first. Pine Barrens land should be looked at after all other options have been exhausted. If parcels located in the Pine Barrens are determined to be the best choice, than areas in the Compatible Growth Area (CGA) should be pursued first before any parcels located in the Core Preservation Area (CPA).
- D. Size:** Any alternate facility should be a minimum of 100 acres. This would allow for trap and skeet as well as sporting clays to be located within the facility as exists at the Southaven Park Facility. Anything less than 100 acres would result in an insufficient buffer for the relocation from the current range. Moving the site should maintain the current size and use or allow for expansion, if possible. The buffer area would have to be at least 1800 feet from the shooting range to any residential community in order to minimize the potential noise impacts.
- E. Cost:** County owned parcels should be considered first because this would be the most economically feasible approach for the taxpayers of Suffolk County. If no county parcels are considered viable, then Suffolk County’s Department of Environment and Energy, Division of Property Acquisition and Management, should reach out to the owners of possible properties to determine if an interest in selling to the county is desirable. If the owner is a willing seller, then planning steps should be initiated to purchase the property. A minimum of 100 acres should be considered.

Suffolk County’s Departments of Planning and Parks and Recreation should be the lead agencies when looking at the feasibility of relocating the Trap and Skeet Facility to one of these sites. Included in this feasibility study the departments should consider access routes, what portion of the property is most suitable to mitigate any noise to the surrounding communities, what steps need to be taken to place a

shooting range within the Compatible Growth Area or Core Preservation Area of the Pine Barrens, and any other pertinent information needed to successfully move the Trap and Skeet.

The committee is not solidifying any property as a definite location to relocate the Suffolk County Trap and Skeet Range. The work of this committee was commissioned only to help in identifying possible locations for the County to consider greater viability, and based on the Committee's research we are recommending that various county departments conduct further research on the feasibility of our findings. We have found merit in Suffolk County's ability to relocate the Suffolk County Trap and Skeet Range, and this report should be used as the foundation towards that goal.

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