

Dear Members of the Board,

My name is Jonathan Butler, and I am a homeowner in the Jacobs Springs community, located in close proximity to the Lafayette Gun Club property. I am writing to respectfully request your careful review of the Lafayette Gun Club's pending Special Use Permit (SUP) reconfiguration proposal and to advocate for a **compliance-first review process** prior to any approval.

To be clear: I am **not opposed to the existence of the gun club**, nor to responsible modernization of facilities. My concern is procedural, regulatory, and protective in nature. This proposal represents a **reconfiguration and operational intensification of a legally non-conforming use**, and approval should not be granted until existing environmental, safety, noise, and compliance concerns are fully corrected and independently verified.

### **Compliance-First Sequencing**

The applicant is requesting permission first and details second. Once an SUP is approved, the County's regulatory leverage is significantly reduced, placing residents in a reactive rather than protected position. I respectfully urge the Board to require:

**Correction of current impacts → Independent verification → Then consideration of reconfiguration.**

This sequencing ensures public protection, regulatory accountability, and sound land-use governance.

### **Residential Proximity & Planning Conflict**

The proposed indoor range structure would be located approximately **134 feet from nearby homes** and roughly **240 feet from others**. This is an extremely close residential setback for a high-intensity commercial shooting facility — particularly one proposing **24/7 operations**.

The property is designated **medium-density residential** under the County's 2040 Comprehensive Plan. This places a heightened burden on the applicant to demonstrate that intensified operations will not degrade neighborhood safety, environmental quality, noise conditions, or residential character.

### **Federal Safety Guidance & Buffer Considerations**

Recognized range safety standards provide useful benchmarks when evaluating proximity concerns. U.S. Army range design guidance (DA PAM 385-63) and widely adopted National Rifle Association Range Source Book standards emphasize substantial safety planning, ballistic containment, and appropriate buffer distances—particularly where firing activities occur near populated areas.

While such standards are most directly applied to military or purpose-built ranges, they illustrate the level of engineered baffling, projectile containment, and surface danger

zone planning typically associated with high-intensity firing operations. The proposed placement of a commercial indoor range approximately 134–240 feet from existing homes warrants careful review against comparable safety engineering benchmarks to ensure complete projectile containment and zero off-site risk.

At minimum, the applicant should be required to provide:

- Engineered containment certification prepared by a qualified ballistic safety engineer
- Documentation demonstrating full projectile capture with no surface danger zone encroachment
- Independent third-party technical review of the range design prior to any approval

### **Legally Non-Conforming Use & Intensification**

The Lafayette Gun Club currently operates as a **legally non-conforming use**. While non-conforming uses may continue, land-use doctrine does not extend these protections to **operational intensification, expanded capacity, or increased activity levels**.

This proposal introduces:

- A new **28-foot-tall structure** (approx. **90' x 140'**)
- **24/7 indoor firing operations**
- Expanded competitions and simultaneous events
- Increased traffic and visitor volume

This constitutes material **intensification of use**, not simple modernization.

### **Prior Renovations Without SUP Review**

Public records indicate that in **2013, significant renovations were undertaken** at this property that materially altered building configuration and operational functionality, yet **no Special Use Permit review occurred** at that time.

This history underscores the importance of:

- Ensuring **full regulatory compliance now**
- Preventing incremental intensification without appropriate public review
- Avoiding precedent whereby non-conforming uses gradually expand without proper oversight

### **Existing Impacts & Resident Concerns**

Across multiple meetings, residents from Brandywine, Holden Lane, C.H.A.T.S., Winders Pond, and surrounding communities consistently raised:

- Existing and projected **noise impacts**
- **Lead particulate exposure** and ventilation concerns
- **Stormwater runoff and soil contamination risk**
- **Safety containment and ballistic engineering**
- **24/7 operational effects on residential quality of life**

- Lack of **independent third-party verification**  
Gunfire is already audible within nearby neighborhoods, and the proposed intensification would further elevate exposure risks.

### **Environmental, Safety & Noise Safeguards**

Approval should be explicitly conditioned upon:

#### **Environmental & Air Quality**

- Independent third-party air quality testing
- Lead particulate monitoring
- Annual compliance certification

#### **Noise & Vibration**

- Independent baseline and post-construction noise studies
- Enforceable decibel thresholds
- Real-time noise monitoring
- Annual verification and revocation mechanisms

#### **Safety Engineering**

- Formal containment design documentation
- Ballistic safety modeling
- Emergency response and operational safety plans

#### **Precedent Risk**

Approval without first requiring correction of existing impacts sets a concerning precedent that undermines residential zoning intent and long-term land-use planning. Once granted, enforcement becomes reactive and leverage is lost.

#### **Closing**

Homeowners invest their life savings into their homes with expectations of safety, stability, and livability. I respectfully ask the Board to ensure that these expectations are protected through rigorous, compliance-first oversight before any operational intensification is authorized.

Thank you for your service and for your thoughtful consideration of this matter.

Respectfully,

Jonathan Butler  
Jacobs Springs Homeowner

