



# **Response to Comments: Plantation Rifle Range Corrective Action Permit and Public Participation Plan**

**Bellingham, Washington**

**Hazardous Waste and Toxics Reduction Program**

Washington State Department of Ecology  
Northwest Region Office  
Shoreline, Washington

**Revised September 2024**

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## Contact Information

### Washington State Department of Ecology

Hazardous Waste and Toxics Reduction Program  
Northwest Region Office  
P.O. Box 330316  
Shoreline, WA 98133-9716

### Website:

[Washington State Department of Ecology](https://www.ecology.wa.gov)<sup>1</sup>

### Michelle Myers

Site Manager  
Telephone: 206-773-3498  
Email: [michelle.myers2@ecy.wa.gov](mailto:michelle.myers2@ecy.wa.gov)

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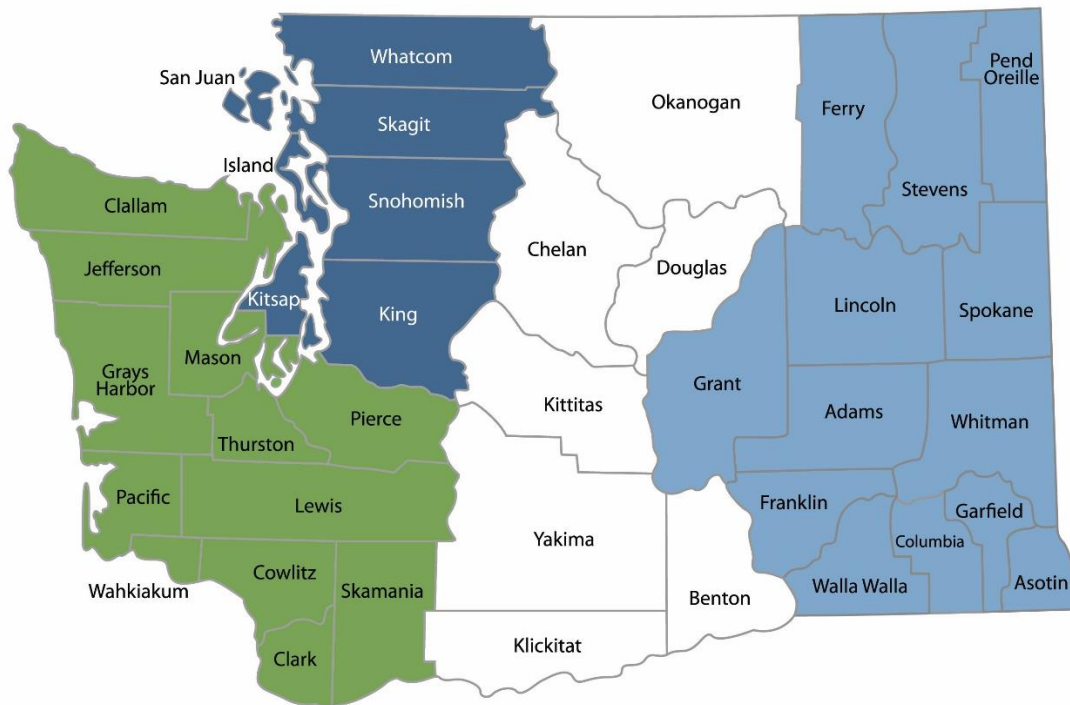
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<sup>1</sup> [www.ecology.wa.gov/contact](https://www.ecology.wa.gov/contact)

<sup>2</sup> [www.ecology.wa.gov/accessibility](https://www.ecology.wa.gov/accessibility)

# Department of Ecology's Region Offices

## Map of Counties Served



<b>Southwest Region</b> 360-407-6300	<b>Northwest Region</b> 206-594-0000	<b>Central Region</b> 509-575-2490	<b>Eastern Region</b> 509-329-3400
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Region	Counties served	Mailing Address	Phone
<b>Southwest</b>	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	PO Box 47775 Olympia, WA 98504	360-407-6300
<b>Northwest</b>	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	PO Box 330316 Shoreline, WA 98133	206-594-0000
<b>Central</b>	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 W Alder St Union Gap, WA 98903	509-575-2490
<b>Eastern</b>	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 N Monroe Spokane, WA 99205	509-329-3400
<b>Headquarters</b>	Across Washington	PO Box 47600 Olympia, WA 98504	360-407-6000

# Response to Comments

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## Plantation Rifle Range Corrective Action Permit and Public Participation Plan

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DEPARTMENT OF  
**ECOLOGY**  
State of Washington

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# Public Outreach Summary

## Site background

Plantation Rifle Range is located at 5102 Samish Way in Bellingham, Washington. Whatcom County Parks & Recreation (Whatcom County) operates the Plantation Rifle Range facility (site). The site opened in 1971. It is located on property owned by Bertch Timberlands, LLC. Whatcom County Parks & Recreation leases the property from Bertch Timberlands, LLC.

Plantation Rifle Range is one of two public shooting ranges in Washington. It consists of an outdoor high-power rifle range, indoor and outdoor small-bore rifle and pistol ranges, a trap field, and a classroom. The high-power rifle range has target lines at 50, 100, 200, and 300 yards. Earthen backstops (to stop bullets) exist behind the 50- and 300-yard target lines. Ruby Creek flows along the eastern boundary of the site's high-power rifle range. Where the creek meets the 300-yard backstop, it enters a pipe running underneath the backstop. The creek re-emerges from the pipe to the southeast of the 300-yard targets.

In addition to Ruby Creek, wetlands are located within and adjacent to the east side of the high-power rifle range. Ruby Creek is a major tributary to Finney Creek, which flows into Lake Samish. Lake Samish is a drinking water supply to area residents around the lake.

In 2020, the Washington State Department of Ecology (Ecology, we) inspected the range and collected surface water samples from the creek. The samples indicated the presence of lead above Clean Water Act standards for aquatic life in freshwater systems. Starting in 2020, Whatcom County began conducting monthly surface water sampling at the site. In 2021, Ecology returned and took soil samples from the range floor. These samples confirmed the presence of lead.

While the amount of lead in the creek is above Clean Water Act standards for aquatic life, the level of lead does not exceed the drinking water action level.

Extensive soil sampling in 2023 detected areas of soil with lead levels well above the dangerous waste limit.

## The cleanup process

To clean up the site, we will follow Washington State's [formal cleanup process](#)<sup>3</sup> as directed under the Model Toxics Control Act ([MTCA](#)<sup>4</sup>).

This will be the first time that lead wastes will be removed since the range opened in 1971.

The site's corrective action permit was prepared by Ecology and Whatcom County. This permit will enable Ecology's Corrective Action Unit to oversee the cleanup at this site and is intended to expedite site cleanup.

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<sup>3</sup> <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-process>

<sup>4</sup> <https://ecology.wa.gov/mtca>

## Outreach

From May 6 to June 28, 2024, Ecology invited public comments on the corrective action permit and public participation plan for Plantation Rifle Range.

Ecology's public involvement activities related to this comment period included:

- **Public Notice Mailer:**
  - United States mail distribution of a [public notice](#)<sup>5</sup> providing information about the cleanup documents and the public comment period. We sent this notice to approximately 2,272 addresses, including neighboring businesses and other interested parties.
  - The notice was also available digitally on [Ecology's website](#).<sup>6</sup>
- **Legal Notice:**
  - Publication of paid display ads in *The Bellingham Herald* on May 5, 2024.
  - Publication of paid display ads in *Cascadia Daily News* on May 3 and May 31, 2024.
  - Publication of paid display ads in *Whatcom Watch* in two issues in May and June 2024.
- **Radio Advertising:**
  - Paid ads ran May 6–10, 2024, on KGMI-AM in various time slots:
    - 6 times each day, 6–9 a.m.
    - 4 times each day, 4–6 p.m.
  - Paid ads ran May 6–10, 2024, on KISM-FM in various time slots:
    - 2 times each day, 6–10 a.m.
    - 5 times each day, 5 a.m.–8 p.m.
  - Paid ads ran May 6–10, 2024, on KPUG-AM in various time slots:
    - 2 times each day, 6–9 a.m.
    - 2 times each day, 1–3 p.m.
    - 4 times each day, 4–6 p.m.
- **Site Register:**
  - Publication of five notices in Ecology's Site Register:
    - Comment Period Notice:
      - May 2, May 16, May 30, June 13, and June 27, 2024.
  - Visit [Ecology's Site Register website](#)<sup>7</sup> to download PDFs of these notices.

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<sup>5</sup> <https://apps.ecology.wa.gov/publications/SummaryPages/2404018.html>

<sup>6</sup> [ecology.wa.gov/PRR](https://ecology.wa.gov/PRR)

<sup>7</sup> [apps.ecology.wa.gov/publications/UIPages/PublicationList.aspx?IndexTypeName=Program&NameValue=Toxics+Cleanup&DocumentTypeName=Newsletter](https://apps.ecology.wa.gov/publications/UIPages/PublicationList.aspx?IndexTypeName=Program&NameValue=Toxics+Cleanup&DocumentTypeName=Newsletter)

- **Media Coverage:**
  - *My Bellingham Now* ran a [Plantation Rifle Range story on June 19](#), 2024.<sup>8</sup>
  - *Cascadia Daily News* ran a [Plantation Rifle Range story on June 21](#), 2024.<sup>9</sup>
- **Social Media:**
  - **X (formerly known as Twitter):** The main Ecology account @ecologywa [posted on May 6](#)<sup>10</sup> about the public comment period and [posted on May 30](#)<sup>11</sup> about the June 20 public meeting. The account @ecyseattle [posted on May 30](#)<sup>12</sup> about the June 20 public meeting.
  - **Facebook:** The Ecology account [posted on May 6](#)<sup>13</sup> about the public comment period and [posted on May 30](#)<sup>14</sup> about the June 20 public meeting.
- **Websites:**
  - Ecology announced the public comment period, posted the public notice mailer (including translations by request in Spanish, German, Russian, Chinese, Japanese, Thai, Arabic, and Tagalog), and made the review documents available on Ecology’s [Plantation Rifle Range webpage](#)<sup>15</sup> and Ecology’s [Public Input & Events webpage](#).<sup>16</sup>
- **Document Repositories:**
  - Copies of the review documents and the public notice mailer (including translations by request) were available for review at the Bellingham Central Library and Ecology’s Northwest Region Office in Shoreline, Washington.
  - Outreach materials also directed the public to contact Janelle Anderson, Outreach Planner, for document review assistance.

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<sup>8</sup> <https://mybellinghamnow.com/news/297792-plantation-rifle-range-contamination-worse-than-expected-cleanup-could-begin-summer-2025/>

<sup>9</sup> <https://www.cascadiadaily.com/2024/jun/21/plantation-rifle-range-cleanup-date-delayed-again-due-to-extent-of-lead-contamination/>

<sup>10</sup> <https://x.com/EcologyWA/status/1787525866312147097>

<sup>11</sup> <https://x.com/EcologyWA/status/1796244188503359559>

<sup>12</sup> <https://x.com/ecyseattle/status/1796571333540917645>

<sup>13</sup> <https://www.facebook.com/EcologyWA/posts/pfbid02sYuksa6hBAckk5HqEpSnZNBetXtoQRcQiQysA1MnyTST1esAjNX7V6nGBsgpCuK1l>

<sup>14</sup> <https://www.facebook.com/EcologyWA/posts/pfbid02HjVo8thVVoTjJTNLHBAE6hb7cBsPwPQCRvf85zGm3L42curvQS5epVjdgRKsLo6ol>

<sup>15</sup> [ecology.wa.gov/PRR](https://ecology.wa.gov/PRR)

<sup>16</sup> [ecology.wa.gov/Events/Search/Listing](https://ecology.wa.gov/Events/Search/Listing)



## Comment Summary

Ecology received 58 comments during the comment period (listed in Table 1).

**Table 1:** List of commenters.

No.	First Name	Last Name	Agency/Organization/Business	Submitted By
1	Matthew	Colston	—	Individual
2	Brian	—	—	Individual
3	Bryce	Teigen	—	Individual
4	Michael	Graham	—	Individual
5	Anonymous	—	—	Individual
6	Tyler	Irwin	—	Individual
7	Ryan	Schuster	—	Individual
8	Kirby	White	—	Individual
9	Jacob	Nipper	—	Individual
10	David	Carleton	—	Individual
11	Jacob	Verhaar	—	Individual
12	chris	nord	—	Individual
13	christopher	stewart	—	Individual
14	Karen	Johnson	—	Individual
15	Mike	Bolton	—	Individual
16	Jody	Wiltfong	—	Individual
17	Brenna	Kentch	—	Individual
18	Christopher	Carter	—	Individual
19	Mark	Woodward	—	Individual
20	Anonymous	—	—	Individual

No.	First Name	Last Name	Agency/Organization/Business	Submitted By
21	Daniel	Goodman	—	Individual
22	Cory	—	—	Individual
23	MATTHEW	SAVAGE	—	Individual
24	BOBBY	TERRY	—	Individual
25	T	Jones	—	Individual
26	Dave	Rosen	—	Individual
27	Greg	Cannistraci	—	Individual
28	Kurt	Kuchenbecker	—	Individual
29	Brent	Zanner	—	Individual
30	Jason	McMillen	—	Individual
31	Anonymous	—	—	Individual
32	Anonymous	—	—	Individual
33	Anonymous	—	—	Individual
34	Andrew	Rathvon	—	Individual
35	Gregory	Holmes	—	Individual
36	Owen	Kilfoyle	—	Individual
37	Juha	Marttila	—	Individual
38	Daniel	Benner	—	Individual
39	Elan	Engel	—	Individual
40	Christopher	Wells	—	Individual
41	Patrick	Mcdonough	—	Individual
42	Charlie	Wolf	—	Individual
43	Anonymous	—	—	Individual

No.	First Name	Last Name	Agency/Organization/Business	Submitted By
44	David	Marod	—	Individual
45	Dan	Murphy	—	Individual
46	Adrian	Olivares	—	Individual
47	Jon	Brown	—	Individual
48	Anthony	S	—	Individual
49	Jack	—	—	Individual
50	Michael	Lilienthal	—	Individual
51	Gabe	Ng	—	Individual
52	Tim	Surratt	—	Individual
53	Anne	Cantrell	—	Individual
54	Allen	H	—	Individual
55	Kyle	Young	Transition Bicycle Company	Business
56	Nancy	Cullinane	—	Individual
57	Jim	Hartl	—	Individual
58	Bernadette	Prinster	—	Individual

## Next Steps

Ecology has reviewed and considered the public comments received about the documents. Our responses are listed in the [Comments and Responses section](#) of this document.

The [corrective action permit](#)<sup>17</sup> was issued July 8, 2024. The site's [public participation plan](#)<sup>18</sup> encourages community involvement in cleanup decisions. It became final following completion of the comment period.

Whatcom County and their contractor will continue investigating site contamination as outlined in the interim action work plan. After the extent of contamination is known, areas above cleanup levels will be excavated and contaminated material will be transported to a hazardous waste landfill. When the site is clean, the County will investigate what changes must be made to operate an outdoor range in compliance with all regulations. If the County decides to proceed with improvements to the outdoor range, those changes will be made. Then the outdoor range can reopen.

The indoor range closure is not a part of the Ecology cleanup. The indoor range is anticipated to reopen sooner than the outdoor range, when upgrades to the indoor air handling system are complete. For more information regarding the reopening of the indoor range, please visit Whatcom County's [indoor range renovations project webpage](#).<sup>19</sup>

See the graphic below and visit Ecology's [cleanup process webpage](#)<sup>20</sup> to learn more about Washington's formal cleanup process.



**Figure 1:** Washington's formal cleanup process ([see a plain text description](#)<sup>21</sup>).

<sup>17</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/143531>

<sup>18</sup> <https://apps.ecology.wa.gov/publications/SummaryPages/2304010.html>

<sup>19</sup> <https://www.whatcomcounty.us/1792/7113/Plantation-Rifle-Range-HVAC-Replacement>

<sup>20</sup> <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-process>

<sup>21</sup> <https://apps.ecology.wa.gov/publications/SummaryPages/1909166.html>

# Comments and Responses

The public comments are presented below, along with Ecology's responses.

## Comment from: Matthew Colston

### Comment I-1-1

I support Department of Ecology permit to carry through the work to clean up the rifle range. This area serves the community and as long as it can operate within compliance ecologically we should get it fixed up for use as soon as possible.

### Response

Contamination at the Plantation Rifle Range will be cleaned up under the corrective action permit, which was issued July 8, 2024. To reopen the range, Whatcom County must make changes to prevent new environmental contamination. The County intends to redesign and reopen an improved range for public use, pending available funding.

## Comment from: Brian

### Comment I-2-1

I support the need to reduce and remove lead contaminants in our waterways and wetlands. I also support publicly accessible areas for everyone to practice safe firearm handling.

To those ends, I support the clean up effort, any improvements to the site to reduce lead contamination in the future, and also keeping the site open after clean up/improvements are finished so the public may continue to have accessible shooting ranges.

### Response

Ecology is committed to ensuring site contamination is cleaned up without delay. To reopen the range, Whatcom County must make changes to prevent new environmental contamination. The County intends to redesign and reopen an improved range for public use, pending available funding.

## Comment from: Bryce Teigen

### Comment I-3-1

Considering the website still states "The work should be finished sometime in 2023." I fully support this cleanup. So many shooting areas are closed so the sooner this gets done, the better.

## Response

Thank you for bringing to our attention the need to update the project timeline on the Ecology webpage. This language has been updated.

Site contamination is worse than expected, so cleanup will take longer than initially thought. We expect the draft remedial investigation and feasibility study to be completed in 2024. Then work will begin on the cleanup action plan and engineering design. The earliest cleanup could occur is in summer of 2025. The removal of lead-contaminated soil will go quickly once it begins.

Whatcom County and Ecology understand that the public values the range as a community resource. To reopen the range, Whatcom County must make changes to prevent new environmental contamination. The County intends to redesign and reopen an improved range for public use, pending available funding.

## Comment from: Michael Graham

### Comment I-4-1

Good morning I wanted urge two points after viewing the plan.

As stated plantation rifle range is one of 2 public ranges in the entire state I believe public ranges are vital to promoting safe and environmentally sustainable use of firearm recreation.

As more and more shooting spots become closed due to population's growth, changes in land use, and illegal dumping in popular shooting spots. It becomes more difficult to recreate in safe, established, and easily accessible locations.

So I ask that there be urgency in proceeding with the clean up as to open up the rifle range as soon as possible. And while not mentioned in the plan please keep this area as a firearms range.

People will always choose the most convenient option, the people who shoot trees, leave shotgun shells, and other irresponsible behavior are better contained and behaved when there are easy accessible public ranges.

## Response

Ecology understands that without access to an appropriate outdoor range, sportsmen and women will practice in other areas, unmanaged for shooting activities, which can pose health and safety risks for other members of the public. We prefer that shooting practice be done in areas designed for shooting, where the bullets and shells can be collected. Contamination at Plantation Rifle Range must be cleaned up to protect human health and the environment. To reopen the range, Whatcom County must make changes to prevent new environmental contamination. The County intends to redesign and reopen an improved range for public use, pending available funding.

## Comment from: Anonymous

### Comment I-5-1

I am here commenting today in favor for the Dangerous Waste Corrective Action Permit being granted for the further lead contamination cleanup of Plantation Rifle Range.

As it currently stands, people in Bellingham have to go to Custer or Burlington to go shooting at a range, and this is incredibly inconvenient for Bellingham residents who don't own a car and have to rely on Whatcom Transit Authority to reach their destinations.

Ranges offer a place where individuals can safely enjoy their shooting hobby, and Plantation Rifle Range is a staple in the Bellingham community. It would be a great shame if the Range was permanently closed.

### Response

Contamination at the Plantation Rifle Range will be cleaned up under the corrective action permit, which was issued July 8, 2024. Ecology understands the importance of having accessible areas designated for shooting activities, which are properly maintained, and where bullets and shells can be collected. To reopen the range, Whatcom County must make changes to prevent new environmental contamination. The County intends to redesign and reopen an improved range for public use, pending available funding.

## Comment from: Tyler Irwin

### Comment I-6-1

A 'permit lite' should be issued immediately for any cleanup needed at the Plantation Site. Further, please don't delay in getting the cleanup started so that the range can be reopened to full service.

Areas for people to practice shooting in the west side of Washington State are becoming fewer and further in between and any expediency that the DOE can take to get this work done, it would be appreciated.

### Response

Contamination at the Plantation Rifle Range will be cleaned up under the corrective action permit, which was issued July 8, 2024. To reopen the range, Whatcom County must make changes to prevent new environmental contamination. The County intends to redesign and reopen an improved range for public use, pending available funding.

## Comment from: Ryan Schuster

### Comment I-7-1

It's important we have a safe and ecologically responsible site to learn and train with firearms. I have found much more shells and casings at sites not designated for such use since the range

closed. It is important we clean and remediate this land and then maintain it for future use. If we don't provide such an environment "bad actors" will behave more carelessly.

## Response

Ecology understands that without access to an appropriate outdoor range, sportsmen and women will practice in other areas, unmanaged for shooting activities, which can pose health and safety risks for other members of the public. We prefer that shooting practice be done in areas designed for shooting, where the bullets and shells can be collected. Contamination at Plantation Rifle Range must be cleaned up to protect human health and the environment within the community. To reopen the range, Whatcom County must make changes to prevent new environmental contamination. The County intends to redesign and reopen an improved range for public use, pending available funding.

## Comment from: Kirby White

### Comment I-8-1

The Plantation Rifle Range is more than just a place for shooting enthusiasts to practice their marksmanship; it's a community asset that deserves our respect and care. Keeping this public shooting area open and clean is crucial for several reasons.

Firstly, cleanliness in public spaces like the Plantation Rifle Range is essential for environmental protection. Casings, targets, and other debris, if not disposed of properly, can harm local wildlife and pollute the natural surroundings. By maintaining a clean range, we ensure the conservation of our environment for future generations to enjoy.

Secondly, a well-maintained shooting area discourages illegal dumping. When bad actors see that a public land is neglected, they might view it as an open invitation to dispose of their trash unlawfully. This not only exacerbates the problem of pollution but also creates a hazardous environment for shooters and visitors alike. Regular cleanup and monitoring can deter such activities and preserve the integrity of the range.

Moreover, established shooting areas with clear guidelines for use and maintenance foster a sense of responsibility among users. Shooters who frequent a clean and well-kept range are more likely to take pride in their shooting space and contribute to its upkeep. This collective effort can significantly reduce the burden of cleaning and ensure that the range remains a safe and welcoming place for all.

Finally, the Plantation Rifle Range serves as a model for responsible gun ownership and usage. By advocating for its cleanliness, we are also promoting a culture of responsibility that extends beyond the range. It sends a powerful message that gun enthusiasts are committed to safety, respect for the environment, and community values.

In conclusion, the Plantation Rifle Range is a valuable community resource that deserves our collective effort to keep it clean and operational. By doing so, we not only protect our environment and discourage illegal activities but also cultivate a culture of responsibility and



pride among shooters. Let's work together to ensure that our public shooting areas remain open, clean, and respected by all.

## Response

Ecology understands that the public values the range as a community resource. We also realize that closing a range means surrounding public lands are used for target practice, which can pose health and safety risks for other members of the public and for the environment. Ecology's role at this site is to make sure contamination is cleaned up and ensure that any future operations do not contaminate the environment. To reopen the range, Whatcom County must make changes to prevent new environmental contamination. The County intends to redesign and reopen an improved range for public use, pending available funding.

## Comment from: Jacob Nipper

### Comment I-9-1

Places to practice our second amendment rights are next to none anymore and it's depressing. Please allow this place to open up again! If the public can help with the clean up please let us know!

## Response

Ecology appreciates the community's interest in helping to clean up Plantation Rifle Range. However, Ecology cannot allow volunteers to help with cleanup of the range. Using experienced environmental professionals in the cleanup process is the most efficient means for cleaning up the site and is critical to ensuring that contamination is safely and fully removed. To reopen the range, Whatcom County must make changes to prevent new environmental contamination. The County intends to redesign and reopen an improved range for public use, pending available funding.

## Comment from: David Carleton

### Comment I-10-1

Public ranges serve multiple purposes. They reduce the public shooting in shared spaces, and on private land. They provide a safer environment as more people can ensure safe practices. Containment can be set up to protect the environment. Keeping this range open, in fact adding more ranges should be a high priority.

## Response

Ecology understands that the public values the range as a community resource, including for critical safety activities like firearm sighting in, practice, and training. Improper design and maintenance of the range has resulted in soil and surface water lead contamination. Ecology's role at this site is to make sure contamination is cleaned up and that any future operations do not contaminate the environment. To reopen the range, Whatcom County must make changes

to prevent new environmental contamination. The County intends to redesign and reopen an improved range for public use, pending available funding.

## **Comment from: Jacob Verhaar**

### **Comment I-11-1**

This is one of the only public places in western Washington that I am able to zero my hunting rifle before the season starts. Public ranges like this are vital to the hunting community and need to be available.

### **Response**

Ecology understands that the public values the range as a community resource, including for critical safety activities like firearm sighting in, practice, and training. Improper design and maintenance of the range has resulted in soil and surface water lead contamination. Ecology's role at this site is to make sure contamination is cleaned up and that any future operations do not contaminate the environment. To reopen the range, Whatcom County must make changes to prevent new environmental contamination. The County intends to redesign and reopen an improved range for public use, pending available funding.

## **Comment from: chris nord**

### **Comment I-12-1**

Please restore the range so it is available to the public. There are limited safe places to shoot in Western Washington. Also, I believe a public range will reduce the number of individuals who shoot (and trash) the back-country.

### **Response**

Ecology understands that the public values the range as a community resource. We also realize that closing a range means surrounding public lands are used for target practice, which can pose health and safety risks for other members of the public and for the environment. Ecology's role at this site is to make sure contamination is cleaned up and ensure that any future operations do not contaminate the environment. To reopen the range, Whatcom County must make changes to prevent new environmental impacts. The County intends to redesign and reopen an improved range for public use, pending available funding.

## **Comment from: christopher stewart**

### **Comment I-13-1**

Please re-open the range. This range is a critical and missing piece of our local culture. Every day it's closed, more people just go into the woods at random and shoot in unsafe environments. Please open PRR now!

## Response

Ecology understands that the public values the range as a community resource. We also realize that closing a range means surrounding public lands are used for target practice, which can pose health and safety risks for other members of the public and for the environment. Ecology's role at this site is to make sure contamination is cleaned up and ensure that any future operations do not contaminate the environment. To reopen the range, Whatcom County must make changes to prevent new environmental impacts. The County intends to redesign and reopen an improved range for public use, pending available funding.

## Comment from: Karen Johnson

### Comment I-14-1

The need for a safe and secluded place to use guns is desperately needed. If a person lives out in the county, it's permitted to shoot in your backyard. This is difficult for the elderly, people with PTSD, pets, wildlife. Reopening this range will hopefully encourage people to shoot responsibly and can be given as an option when the topic arises. I am a gun control advocate and I believe this is a necessary service that needs provided by and for our communities.

## Response

Ecology understands that the public values the range as a community resource. We also realize that closing a range means surrounding public lands are used for target practice, which can pose health and safety risks for other members of the public and for the environment. Ecology's role at this site is to make sure contamination is cleaned up and ensure that any future operations do not contaminate the environment. To reopen the range, Whatcom County must make changes to prevent new environmental impacts. The County intends to redesign and reopen an improved range for public use, pending available funding.

## Comment from: Mike Bolton

### Comment I-15-1

I am extremely skeptical of the state. It seems to most, I've discussed this with, this closure was not for lead abatement, but because a bunch of liberals decided they want it shut down. All calls up to this point have been ignored. I've personally called numerous times. Can't get a call back. I've offered to help. I'll say this, as a local to this range, it's closure has directly effected the area. It's been closed way beyond what was originally told to public, so now, thanks to govt ineptitude, the surrounding woods have become a free for all. Especially right before hunting season, since there's nowhere to properly sight in a rifle now... It's ironic really, Wa State goes on and on about safety, but instead of having a safe place to shoot, it's been taken away. Lastly, why is the person in charge of this 2 hrs away, in a blatantly Democrat stronghold city that has gone ban crazy? Why isn't a local, that understands the community in charge?

## Response

Site contamination is worse than expected, so cleanup will take longer than initially thought. Improper design and maintenance of the range has resulted in extensive soil and surface water lead contamination. Lead is a hazardous material that can affect almost every organ and system in the human body. The U.S. Environmental Protection Agency has determined that there is no safe level of exposure to lead. Ecology's role at this site is to make sure contamination is cleaned up and that any future operations do not contaminate the environment.

Ecology appreciates the public's interest in helping to clean up Plantation Rifle Range. However, Ecology cannot allow volunteers to help with cleanup of the range. Using experienced environmental professionals in the cleanup process is the most efficient means for cleaning up the site and is critical to ensuring that contamination is safely and fully removed. To reopen the range, Whatcom County must make changes to prevent new environmental impacts. The County intends to redesign and reopen an improved range for public use, pending available funding.

Ecology's project team includes individuals based in both our Shoreline and Bellingham offices. Ecology is also collaborating with Whatcom County on range cleanup. The Ecology team is not aware of recent phone calls made regarding the Plantation Rifle Range. For the Ecology Site Manager's contact information, please visit the [Ecology Plantation Rifle Range webpage](#).<sup>22</sup>

## Comment from: Jody Wiltfong

### Comment I-16-1

Thank you for overseeing this work. I want to first express my gratitude towards the department for being diligent and forthright when it comes to our water. However, I do want to mention that as a person who has regularly used this rifle range this clean up process has been a major inconvenience and has caused some adverse affects. With this area closed, the only option for recreational shooters is to go to a private range which can cost an insane amount of money, or shoot on other public lands like DNR and National Forest. Because of the high cost associated with going to a private range, most people will choose to do that latter. While most people do this safely, this activity can cause conflict in areas that see multiple user groups. I am also concerned about the excess amount of lead on our public lands as a result. At least at a rifle range it is contained, but on DNR and forest lands lead fragments could be scattered and impossible to clean up. This project has been ongoing in association with other improvements at the rifle range and I fear that the damage to other public lands caused as a result of this extended closure is irreversible.

## Response

Ecology understands the importance of having accessible areas designated for shooting activities, which are properly maintained, and where bullets and shells can be collected. We do realize that closing a range means surrounding public lands are used for target practice. Ecology

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<sup>22</sup> <https://apps.ecology.wa.gov/cleanupsearch/site/15182>

and Whatcom County are working together to expedite the cleanup and to determine how the range can be modified to safely manage lead waste. The cleanup gives the County an opportunity to assess, redesign, and redevelop the outdoor ranges.

## **Comment from: Brenna Kentch**

### **Comment I-17-1**

This is absolutely ridiculous. This site should have been cleaned up and opened to the public months ago! We are waiting, hurry up!

### **Response**

Site contamination is worse than expected, so cleanup will take longer than initially thought. To reopen the range, Whatcom County must make changes to prevent new environmental impacts. The County intends to redesign and reopen an improved range for public use, pending available funding.

## **Comment from: Christopher Carter**

### **Comment I-18-1**

Cleanup, rehabilitation and reopening of the Plantation Rifle Range is in the best interested of everyone, including those who are not recreational shooters. Having a place people can go and shoot where lead contamination is contained and can be remediated is essential because the alternative is people driving out to various lands that are not maintained and monitored where they will shoot, and leave contamination and garbage, which finds its ways into our watersheds and destroys our public lands. Giving people facilities to shoot at reduces the environmental impact for everyone in the county, and I think that is more than worth the cost and effort to rehabilitate Plantation.

### **Response**

Ecology understands the importance of having accessible areas designated for shooting activities, which are properly maintained, and where bullets and shells can be collected. We do realize that closing a range means surrounding public lands are used for target practice. Ecology and Whatcom County are working together to expedite the cleanup and to determine how the range can be modified to safely manage lead waste. The cleanup gives the County an opportunity to assess, redesign, and redevelop the outdoor ranges.

## **Comment from: Mark Woodward**

### **Comment I-19-1**

Suitable target/sport shooting locations for the public are very limited. The cleanup and reopening of the Plantation Rifle Range should be expedited to reduce the impact on other public lands where shooting sports activities are necessarily displaced to, while the remediation

is conducted at the Plantation Rifle Range. Cleanup and reopening of the range should be accomplished no later than mid-2025. The longer the project takes, the more alternative locations will be informally used and potentially damaged.

The cleanup of the outdoor range should be designed such that the indoor small bore/pistol range can be reopened as soon as practical. Public announcements have signaled that the indoor range HVAC and roof project were near completion several times but each anticipated reopening date of the indoor range has passed without apparent action and no update on the project has been posted on the Plantation Rifle Range since December 2022. The status and reopening plan for the indoor range should be explicitly communicated in the context of the outdoor range cleanup.

## Response

We do realize that closing a range means surrounding public lands are used for target practice. Ecology and Whatcom County are working together to expedite the cleanup and to determine how the range can be modified to safely manage lead waste. The cleanup gives the County an opportunity to assess, redesign, and redevelop the outdoor ranges. The outdoor range cleanup is currently expected to be complete in 2025. However, this cleanup timeline does not include the redesign and reopening of the outdoor range.

The indoor range closure is not a part of the Ecology cleanup. The indoor range is anticipated to reopen sooner than the outdoor range, when upgrades to the indoor air handling system are complete. For more information regarding the reopening of the indoor range, please visit [Whatcom County's indoor range renovations project webpage](https://www.whatcomcounty.us/1792/7113/Plantation-Rifle-Range-HVAC-Replacement).<sup>23</sup>

## Comment from: Anonymous

### Comment I-20-1

Please do whatever is needed to open this range back up to the public. Public lands are consistently being shut down to residents and we need a place to practice the shooting sports.

Thank you!

## Response

Ecology understands that the public values the range as a community resource. Ecology's role at this site is to make sure contamination is cleaned up and ensure that any future operations do not contaminate the environment. To reopen the range, Whatcom County must make changes to prevent new environmental impacts. The County intends to redesign and reopen an improved range for public use, pending available funding.

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<sup>23</sup> <https://www.whatcomcounty.us/1792/7113/Plantation-Rifle-Range-HVAC-Replacement>

## **Comment from: Daniel Goodman**

### **Comment I-21-1**

Local shooters needs a range to shoot at, please reopen this.

### **Response**

Ecology's role at this site is to make sure contamination is cleaned up and ensure that any future operations do not contaminate the environment. To reopen the range, Whatcom County must make changes to prevent new environmental impacts. The County intends to redesign and reopen an improved range for public use, pending available funding.

## **Comment from: Cory**

### **Comment I-22-1**

I 100% support cleanup, and believe strongly that we should get as many of the users of the range possible to assist and/or help pay for it, including the police departments that have been using it. There's no reason they can't clean up after themselves, even if minimally, after each use, and they should be required to contribute to a cleanup (minor excavation of topsoil and new gravel laid) at least quarterly. It's called responsibility.

### **Response**

Ecology appreciates the community's interest in helping to clean up the Plantation Rifle Range. However, Ecology cannot allow volunteers to help with cleanup of the range. Using experienced environmental professionals in the cleanup process is the most efficient means for cleaning up the site and is critical to ensuring that contamination is safely and fully removed. As the operator of the site, Whatcom County is responsible for cleanup of the site.

## **Comment from: MATTHEW SAVAGE**

### **Comment I-23-1**

Whatever needs to be done to clean up the ground from lead should be done as quickly as possible to get the range back open to the public. So much of our public lands in Whatcom County continue to be shutdown from people shooting and leaving trash. If the Plantation Range is reopened it will help stem some of that trash being left on public land.

### **Response**

Ecology understands that the public values the range as a community resource. We also realize that closing a range means surrounding public lands are used for target practice, which can pose health and safety risks for other members of the public and for the environment. Ecology's role at this site is to make sure contamination is cleaned up and ensure that any future operations do not contaminate the environment. To reopen the range, Whatcom County must

make changes to prevent new environmental impacts. The County intends to redesign and reopen an improved range for public use, pending available funding.

## **Comment from: BOBBY TERRY**

### **Comment I-24-1**

Clean the area and reopen it. Have more clean ups every few years so the problem doesn't get so bad. Without this range, target shooting will be much more dispersed and effect a larger area of Whatcom. The shooting and littering in the county rarely gets cleaned up.

### **Response**

Ecology is committed to making sure contamination at this site is cleaned up without delay. Whatcom County is working to redesign the range to prevent environmental impacts. They intend to reopen an improved range for public use, pending available funding. The new range will have to be designed and equipped to ensure that all bullets fired end up in the collection containment. Bullet collection technologies, monitoring, and maintenance will be a central part of this design.

## **Comment from: T Jones**

### **Comment I-25-1**

Would be a waste of money and space to keep it closed. No one would be able to build on it if sold, might as well just keep it open.

### **Response**

Improper design and maintenance of the range has resulted in soil and surface water lead contamination. Lead is a hazardous material that can affect almost every organ and system in the human body. The U.S. Environmental Protection Agency has determined that there is no safe level of exposure to lead. Lead contamination has been detected in the soil in all outdoor shooting lanes and in the surface water of Ruby Creek and the onsite wetlands. Soil samples have shown lead concentrations harmful to human health and surface water samples have shown lead concentrations at levels harmful to fish and aquatic life. Ecology is committed to protecting human health and the environment. To reopen the range, Whatcom County must make changes to prevent new environmental impacts. The County intends to redesign and reopen an improved range for public use, pending available funding.

## **Comment from: Dave Rosen**

### **Comment I-26-1**

I would like to see the Plantation Range cleaned up and reopen for use by residents. There are not enough facilities in the area for recreational shooting.



## Response

Ecology understands that the public values the range as a community resource. To reopen the range, Whatcom County must make changes to prevent new environmental impacts. The County intends to redesign and reopen an improved range for public use, pending available funding.

## Comment from: Greg Cannistraci

### Comment I-27-1

I have used the range many times over my 25 years in the Bellingham area. Appropriate cleanup is important so as not to pass the lead down the food chain via groundwater or other means.

## Response

Ecology is committed to making sure contamination at this site is cleaned up without delay.

## Comment from: Kurt Kuchenbecker

### Comment I-28-1

Just reopen. This process has taken far too long. The "cleanup" was not needed and a waste of taxpayer money. The only reason the rifle range was targeted is our liberal government hates guns and will do whatever it can to make things more difficult for gun owners.

## Response

Improper design and maintenance of the range has resulted in soil and surface water lead contamination. Lead is a hazardous material that can affect almost every organ and system in the human body. The U.S. Environmental Protection Agency has determined that there is no safe level of exposure to lead. Lead contamination has been detected in the soil in all outdoor shooting lanes and in the surface water of Ruby Creek and the onsite wetlands. Soil samples have shown lead concentrations harmful to human health and surface water samples have shown lead concentrations at levels harmful to fish and aquatic life.

Ecology's role at this site is to make sure contamination is cleaned up and that any future operations do not contaminate the environment. To reopen the range, Whatcom County must make changes to prevent new environmental impacts. The County intends to redesign and reopen an improved range for public use, pending available funding.

## Comment from: Brent Zanner

### Comment I-29-1

Please clean up our public rifle range. It is the only one in Bellingham, our only other option is to shoot on our own properties out in the county. It's far safer and nicer to have a range to go

to and it is sad how long this has been drawn out. Please push this project all the way through, firearm owners of Whatcom need these ranges!

## Response

Improper design and maintenance of the range has resulted in soil and surface water lead contamination. Site contamination is worse than expected, so cleanup will take longer than initially thought. Ecology is committed to making sure contamination at this site is cleaned up. To reopen the range, Whatcom County must make changes to prevent new environmental impacts. The County intends to redesign and reopen an improved range for public use, pending available funding.

## Comment from: Jason McMillen

### Comment I-30-1

Department of Ecology is once again overstepping its authority and boundaries by closing a very popular recreational shooting range. They say the lead "could" contaminate water. You'd think an agency like Ecology would have better science based data on lead contamination the "could".

This is an attack on the second amendment. People need a place to shoot firearms safely. Having one area designated to shoot firearms is critical to saving the environment. When you close an area like Plantation Range the people who used the range now go out on public lands shooting their firearms into trees, gravel pits, and questionable backstops.

Law enforcement agencies depend on facilities like plantation to conduct their training. Closing this facility was not because of lead contamination. It was to prevent American Citizens from enjoying their constitutional rights.

When was the last time Ecology inspected the Olympic pipeline? Hundreds of thousands gallons of fuel are pumped from Ferndale to Seattle every month. Where's the outrage? Remember June 10th 1999?

Ecology doesn't care about your health and safety. They care about taking away your rights under the guise of "could be contaminated".

## Response

We understand that the public values the range as a community resource. The range will need to be cleaned up and redesigned so that it can operate without negative impacts to the environment. Lead contamination has been detected in the soil in all outdoor shooting lanes and in the surface water of Ruby Creek and the onsite wetlands. Soil samples have shown lead concentrations harmful to human health, and surface water samples have shown lead concentrations at levels harmful to fish and aquatic life. Lead is a hazardous material that can affect almost every organ and system in the human body. The U.S. Environmental Protection Agency has determined that there is no safe level of exposure to lead.

We are working with Whatcom County to ensure the cleanup of lead contamination at the site and to provide a safe and well-designed range for shooting practice that also protects our wildlife areas.

The Washington Utilities and Transportation Commission (UTC) is responsible for inspecting pipelines for compliance with state and federal regulations. It is Ecology's understanding that the UTC continues to inspect pipelines within Washington.

## **Comment from: Anonymous**

### **Comment I-31-1**

We need to clean this place up and have a place to teach the kids firearms training. DNR is shutting everywhere else down.

### **Response**

Ecology understands that the public values the range as a community resource, including for critical safety activities like firearm sighting in, practice, and training. To reopen the range, Whatcom County must make changes to prevent new environmental impacts. The County intends to redesign and reopen an improved range for public use, pending available funding.

## **Comment from: Anonymous**

### **Comment I-32-1**

We all need to do whatever is needed to keep these places open for public use. Do whatever is needed by all means

### **Response**

Ecology understands that the public values the range as a community resource. To reopen the range, Whatcom County must make changes to prevent new environmental impacts. The County intends to redesign and reopen an improved range for public use, pending available funding.

## **Comment from: Anonymous**

### **Comment I-33-1**

This is a very essential place for people who participate in target shooting in Whatcom county. Permanently closing this would have very negative effects on the target shooting community and push people to go shoot in places that are unsafe and illegal. Keep open a spot for people to go that can be safe and maintained. A majority of the community that target shoots are responsible and willing to keep the range clean and maintained.

## Response

Ecology understands the importance of having accessible areas designated for shooting activities, which are properly maintained, and where bullets and shells can be collected. To reopen the range, Whatcom County must make changes to prevent new environmental impacts. The County intends to redesign and reopen an improved range for public use, pending available funding.

## Comment from: Andrew Rathvon

### Comment I-34-1

I fully support a cleanup, redesign and reopening of the Plantation Range. This area of the state sorely lacks places to practice marksmanship, whether that be for shooting sports or hunting. Without Plantation, shooters have little option but to practice in areas that are not designed for it and not as safe as a true range.

## Response

Ecology understands the importance of having accessible areas designated for shooting activities, which are properly maintained, and where bullets and shells can be collected. To reopen the range, Whatcom County must make changes to prevent new environmental impacts. The County intends to redesign and reopen an improved range for public use, pending available funding.

## Comment from: Gregory Holmes

### Comment I-35-1

I would like to see some effort put forth to expedite this project.

I believe the pace of the process thus far has been unreasonably slow and poorly managed. Due to the configuration of the range and the locations where lead entered the ground, it should not be terribly complicated to characterize the site and begin reclamation. The duration of the project has increased significantly and costs have increased at least two-fold. Site characterization, as reported by Whatcom County, has been ongoing since at least Q1/2023.

There are no other public shooting ranges in the region that have the facilities offered by the Plantation Range. Closure of the range, while understandable, has a significant impact on recreational shooters. Please work to keep the project well-controlled and moving forward at a reasonable pace.

## Response

Site contamination is worse than expected, so cleanup will take longer than initially thought. A thorough remedial investigation is a critical step in the cleanup process. The remedial investigation is ongoing and includes cleanup workers accessing and sampling the site. We expect the draft remedial investigation and feasibility study to be completed in 2024. Then

work will begin on the cleanup action plan and engineering design. The earliest cleanup could occur is in summer of 2025. The removal of lead-contaminated soil will go quickly once it begins. While this may seem slow, this cleanup is moving much more quickly than our standard process. The County is working diligently to clean up the range and restore a more functional and environmentally responsible range.

## **Comment from: Owen Kilfoyle**

### **Comment I-36-1**

It is very important that access to sights like this not be hindered for longer than necessary. While the cleanup is definitely a must, this sight has been used for decades by the public to exercise their constitutional right to bear arms by the training and use of firearms in a safe venue provided by the state. Concerns around the wetlands and possible spread of contaminants must be balanced with the opportunity to exercise constitutional rights. I hope that the cleanup will be done with delay so that this key part of our community can be opened to the public to come safely use their firearms once more.

### **Response**

Ecology understands that the public values the range as a community resource. Ecology is committed to ensuring site contamination is cleaned up without delay. To reopen the range, Whatcom County must make changes to prevent new environmental impacts. The County intends to redesign and reopen an improved range for public use, pending available funding.

## **Comment from: Juha Marttila**

### **Comment I-37-1**

Please complete lead remediation as soon as possible.

### **Response**

Ecology is committed to making sure contamination at this site is cleaned up without delay.

## **Comment from: Daniel Benner**

### **Comment I-38-1**

Please keep Plantation open. Whatcom county needs a safe place to shoot.

### **Response**

Ecology understands that the public values the range as a community resource. To reopen the range, Whatcom County must make changes to prevent new environmental impacts. The County intends to redesign and reopen an improved range for public use, pending available funding.

## Comment from: Elan Engel

### Comment I-39-1

The Plantation Rifle range is a supervised, contained way for hunters and sportsmen to sight in rifles and practice marksmanship. Losing this valuable public resource will mean more lead and trash on public lands, less supervision of shooting sports by folks who might be reckless and unsafe, and less opportunity for sportsmen and women to become safe competent outdoorsfolk. It's important to understand that closing the facility will have an adverse environmental and safety impact that should not be accepted by the community. The close monitored conditions at an organized range are superior to scattering the impact across public lands. It should be a priority both for environmental stewardship as well as public safety for DOE to move expeditiously to re-open the facilities.

### Response

Ecology understands that the public values the range as a community resource, including for critical safety activities like firearm sighting in, practice, and training. We also realize that closing a range means surrounding public lands are used for target practice, which can pose health and safety risks for other members of the public and for the environment. Ecology's role at this site is to make sure contamination is cleaned up and ensure that any future operations do not contaminate the environment. To reopen the range, Whatcom County must make changes to prevent new environmental impacts. The County intends to redesign and reopen an improved range for public use, pending available funding.

## Comment from: Christopher Wells

### Comment I-40-1

With the history of the lack of care for so many years all my faith has been lost for a government to run this range. I do see a need for police training, safety classes for youth and new gun owners. When the clean up is complete open it provisionally for law enforcement and training. Then decide if the general public should be allowed to use it. Remember the environment needs to be our focus. Law enforcement should also be part of the focus. To keep our community safe I support only law enforcement use.

### Response

We are working with Whatcom County to provide a safe and well-designed range for shooting practice—one that also protects our wildlife areas. To reopen the range, Whatcom County must make changes to prevent new environmental impacts. The County intends to redesign and reopen an improved range for public use, pending available funding. Bullet collection technologies, monitoring, and maintenance will be a central part of this design.

Without access to an appropriate outdoor range, sportsmen and women will practice in other areas, unmanaged for shooting activities. This can pose health and safety risks for other

members of the public and for the environment. We prefer that shooting practice be done where the bullets can be collected.

## **Comment from: Patrick McDonough**

### **Comment I-41-1**

This rifle range is a great place for hunters, sportsmen and women, shooting enthusiasts and the like to responsibly shoot, sight in, and enjoy our firearms. As an individual who frequented the range to recreationally and safely shoot my firearms, I wish to see this site open for operations in the near future. Of course, when a range that has been there for as long as this one, established by the marine corps mind you, there will be bullets deposited into earthen backstops. Since this site has been shut down, and most of the contamination near the creek is off the 50 yard line benches, is it not feasible to open up the 100, 200 and 300 yard backstops with bullet traps in place of a backstop? I believe every problem has a solution, and though temporary, I think a solid bullet trap backstop will suffice.

At least give all of us a chance who love this range some more time at least with the targets away from the creek.

Cleanup is extremely important and must be dealt with, but I do not believe a complete closure is warranted, I believe there are ways to work around the Cleanup and use of the range..... even some sacrificial material to be used as a backstop for bullets.

### **Response**

Lead contamination has been detected in the soil at all outdoor shooting lanes and in the water of the onsite wetlands and Ruby Creek. It may seem logical that people could continue shooting and adding lead contamination to the site, because the cleanup hasn't occurred yet. However, we currently have workers sampling soil and determining the extent of the cleanup, which is necessary before we can design the cleanup and obtain bids on the work. If we allow people to continue shooting, lead may accumulate in new places. This would require the sampling work to be redone or expanded, which would further delay the cleanup and range reopening. It also would not be physically safe for cleanup workers to be present on a live firing range.

We understand that the public values the range as a community resource. Prior to reopening, the range must be modified so that lead can be captured and collected regularly. The County intends to redesign and reopen an improved range for public use, pending available funding.

## **Comment from: Charlie Wolf**

### **Comment I-42-1**

I am writing to provide input regarding the closure of the Plantation Rifle Range. I would like to see the range functional again because it's a huge benefit to the community, being only one of two public ranges in the state, and I feel that much of the closure is due to the political climate and anti-gun culture more than any legitimate environmental or health concern (note I am a physician). There are plenty of other sources of elevated lead levels in various communities

which may indeed pose a much greater hazard than the perceived threat of the Plantation Rifle Range.

My comments below pertain to the two outside ranges primarily since I do not use the indoor range.

First, does the range actually need to be cleaned up? While the sampling indicates elevated lead in the range soil itself, is that not to be expected at EVERY rifle range, especially on one that has been in service since 1971 and has never been cleaned? Members of the general public do not recreate, play barefoot frisbee nor have picnics on the rifle range soil, so what exactly is the threat to the public? It is understandable that lead from the rifle range may affect samples collected from the rifle range soil itself and adjacent areas such as site surface water, but what is the actual risk to the environment, wildlife, people, etc.? Especially when lead level samples taken downstream from the site in Ruby and Finney creeks show no elevated lead levels or threats.

Is the Lake Samish water supply contaminated with lead? In other words, is treated water from Lake Samish showing elevated levels of lead? If not, then what is the concern?

How do the collected samples from the Plantation Range compare to say lead levels in Lake Whatcom, the Bellingham municipal water supply and Whatcom Creek where it drains into Bellingham Bay? Surely there are urban and industrial contaminants including lead that leach into Whatcom Creek as it courses through the city? And many people recreate by swimming in Whatcom Creek in Whatcom Falls Park, and camp along its banks (many homeless live there) and fish in it, the mouth of which is/was next door to a huge scrap metal recycling plant (with lots of heavy metals) next to Maritime Heritage Center.

Your summary pointed out: "By the time surface water leaves the site, it has mixed with other surface water and is below dangerous waste levels" AND "Private drinking water wells closest to the rifle range were sampled to ensure that residents were not being exposed to lead-contaminated groundwater. Lead levels for all the wells tested were within the drinking water standards." So what exactly is the concern? Children will not be grazing on the rifle range soil, so how will contamination and poisoning of people take place? The draft lite summary also indicated that surface water samples of lead are well within the standard for drinking water, but paradoxically exceed the standards for aquatic life?

By closing the range, you have introduced other moral hazards including 1) people not having a safe place to learn, use and practice with firearms safely, and 2) the inevitable emergence of many random impromptu unregulated roadside shooting areas (in National Forest land along the Nooksack, DNR land, etc) with serious concerns with regard to safety, in addition to dispersion of lead contamination to other unregulated areas that have zero oversight, along with resultant litter and refuse left behind by those irresponsible and not at a formal range with rules and expectations in terms of behavior and safety. People have been shot and killed due to negligence at these unofficial roadside shooting areas.



Again, why exactly does lead need to be clean off of the soil at the range? It seems to be an extremely overpriced expensive remediation process for a contaminant that doesn't actually create a current risk to the surrounding environment from the studies that you have reported thus far. Since the lead appears to be contained by the adjacent soil and diluted in the ultimate water run off, why not just leave the lead there and understand that it's expected at a rifle range? What's the point of scraping off the soil and trucking it to a hazardous waste site? Isn't that just moving the issue and creating a lot of expense? Don't you think it will reaccumulate once the range opens?

I say leave the outdoor range as it, reopen it, and continue to monitor the downstream effects (on local wells, Lake Samish water supply etc.).

Conclusion, to quote Shakespeare: Much ado about nothing!

PS: Please keep me updated as I would like to participate in further discussions of this issue.

## Response

The lead contamination at Plantation Rifle Range must be cleaned up. Standard and required firing range maintenance includes the regular collection of lead bullets and engineered controls that prevent the accumulation of lead or the introduction of contamination into the environment. Plantation Rifle Range did not collect lead bullets or institute appropriate engineered controls in the over 50 years of operation. Prior to reopening, the range must be modified so that lead can be captured and collected regularly.

Ecology does not make cleanup decisions about one site based on the presence or absence of other remedial sites in the area. For more information regarding known contaminated sites in your area, please visit [Ecology's What's in My Neighborhood webpage](https://apps.ecology.wa.gov/neighborhood/).<sup>24</sup> To report a spill or an environmental issue, please visit [Ecology's Statewide Environmental Reports Tracking System](https://ecology.wa.gov/footer-pages/report-an-environmental-issue/statewide-reporting-form-erts).<sup>25</sup>

A complete remedial investigation that characterizes the extent of contamination has not yet been finalized. Thus far, lead contamination has been detected in the soil in all outdoor shooting lanes and in the surface water of the onsite wetlands and Ruby Creek. Soil samples collected across the site have shown lead concentrations harmful to human health. Some soil samples taken from this site had lead at levels more than 100 times the hazardous waste limit. Samples that were collected from Ruby Creek showed lead concentrations at levels harmful to fish and aquatic life. Aquatic life can be more sensitive to certain chemicals than humans and smaller concentrations can negatively affect aquatic life. Exposure pathways for onsite lead are still being investigated and a summary will be provided in the remedial investigation, which will be released for public comment in 2024.

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<sup>24</sup> <https://apps.ecology.wa.gov/neighborhood/>

<sup>25</sup> <https://ecology.wa.gov/footer-pages/report-an-environmental-issue/statewide-reporting-form-erts>

The U.S. Environmental Protection Agency has determined that there is no amount of lead that is safe for people to consume. It accumulates in our bodies and damages our central nervous system. Remedial action is required to remove site soil contamination and prevent the migration of lead from the soil to surface water or groundwater. Ecology and Whatcom County will continue to monitor downstream surface water and groundwater supply wells for lead.

For additional information about lead waste and toxicity, visit:

- [Lead waste](#).<sup>26</sup>
- [Sources of lead in our environment](#).<sup>27</sup>
- [Lead risk and health effects](#).<sup>28</sup>

We appreciate feedback and input from the community. To sign up for Whatcom County project updates, please visit the [County project webpage](#).<sup>29</sup>

## Comment from: Anonymous

### Comment I-43-1

I am writing in support of remediating any issues and reopening the range for responsible firearm usage.

### Response

Ecology is committed to making sure contamination at this site is cleaned up. To reopen the range, Whatcom County must make changes to prevent new environmental impacts. The County intends to redesign and reopen an improved range for public use, pending available funding.

## Comment from: David Marod

### Comment I-44-1

If we continue to posses and practice safely with firearms then we need facilities to do this especially hunting rifles. At lease here it is contained and we can continue clean up. Open the place back up!!

### Response

Ecology understands that the public values the range as a community resource, including for critical safety activities like firearm sighting in, practice, and training. Ecology's role at this site is to ensure contamination is cleaned up and that any future operations do not contaminate the

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<sup>26</sup> <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Dangerous-waste-guidance/Common-dangerous-waste/Lead-waste>

<sup>27</sup> <https://kingcounty.gov/depts/health/environmental-health/toxins-air-quality/arsenic-lead/about-lead.aspx>

<sup>28</sup> <https://www.epa.gov/lead/learn-about-lead>

<sup>29</sup> <https://www.whatcomcounty.us/list.aspx?ListID=321>

environment. The range must also be modified so that lead can be captured and collected regularly. The County intends to redesign and reopen an improved range for public use, pending available funding.

## **Comment from: Dan Murphy**

### **Comment I-45-1**

I support the closure of the gun range. I am concerned about the ecological damage from stormwater runoff, as well as the noise pollution.

### **Response**

Ecology is committed to making sure contamination at this site is cleaned up. The cleanup gives the County an opportunity to assess, design, and redevelop outdoor ranges that are protective of human health and the environment. Without access to an appropriate outdoor range, sportsmen and women will practice in other areas, unmanaged for shooting activities. This can pose health and safety risks for other members of the public. We prefer that shooting practice be done where the bullets can be collected.

Your concerns about noise will be shared with the County.

## **Comment from: Adrian Olivares**

### **Comment I-46-1**

To whom it may concern,

Please reopen this shooting range! We are running out of spots to go shooting and this absurd outrage over gun ownership needs to end. That is all and please consider us sportsmen when making your decision.

Best,

Adrian

### **Response**

Ecology understands that the public values the range as a community resource. To reopen the range, Whatcom County must make changes to prevent new environmental impacts. The County intends to redesign and reopen an improved range for public use, pending available funding.

## **Comment from: Jon Brown**

### **Comment I-47-1**

Born and raised in Bellingham, the Plantation Range has been an important part of my life and many others. This range is worth saving and continuing. It is a worthy venture and I look forward to its cleanup and continued existence. Of note as well is range technology exists which should mitigate future contamination to the extent that it seems to be at this time. Thank you.  
Jon Brown

### **Response**

Ecology understands that the public values the range as a community resource. To reopen the range, Whatcom County must make changes to prevent new environmental impacts. The County intends to redesign and reopen an improved range for public use, pending available funding. Bullet collection technologies, monitoring, and maintenance will be a central part of this design.

## **Comment from: Anthony S**

### **Comment I-48-1**

Whatcom County residents need a safe place to shoot. The range has provided that for many years. With almost no places to shoot on public land this range is more essential than ever. Thank you.

### **Response**

Ecology understands that the public values the range as a community resource. To reopen the range, Whatcom County must make changes to prevent new environmental impacts. The County intends to redesign and reopen an improved range for public use, pending available funding.

## **Comment from: Jack**

### **Comment I-49-1**

Is there a reason that the site is closed while work has not started? It makes sense to close the site if cleanup is occurring but otherwise it should remain open while the years of permits are completed. It is an essential service to the community to provide a safe place for people to learn gun safety. By staying closed for so long it is promoting people to find alternate places to target shoot which are less safe than an established range.

### **Response**

It may seem logical that people could continue shooting and adding lead contamination to the site, because the cleanup hasn't occurred yet. However, we currently have workers sampling soil and determining the extent of the cleanup, which is necessary before we can design the

cleanup and obtain bids on the work. If we allow people to continue shooting, lead may accumulate in new places. This would require the sampling work to be redone or expanded, which would further delay the cleanup and range reopening. It also would not be physically safe for cleanup workers to be present on a live firing range. Prior to reopening, the ranges must be modified so that lead can be captured and collected regularly. Whatcom County is doing their best to clean up, redesign, and return a more functional and more environmentally responsible range to the community.

We realize that a lack of safe, well-designed places to shoot pushes people into wilderness areas to practice. Ecology is working with Whatcom County to provide a safe and well-designed range that is protective of the environment.

## **Comment from: Michael Lilienthal**

### **Comment I-50-1**

I own no guns and don't shoot at the plantation. That being said, if cleanup is not going to start for another year, the range needs to reopen. Folks have not stopped shooting when all the areas to target practice are closed. They are now using unsafe areas around whatever forest road they can find, bringing their trash and leaving their shells and whatever they are shooting. For the sake of everyone, reopen the range. It's going to be cleaned up anyways so there is no reason not to allow access until that point.

Thanks

### **Response**

It may seem logical that people could continue shooting and adding lead contamination to the site, because the cleanup hasn't occurred yet. However, we currently have workers sampling soil and determining the extent of the cleanup, which is necessary before we can design the cleanup and obtain bids on the work. If we allow people to continue shooting, lead may accumulate in new places. This would require the sampling work to be redone or expanded, which would further delay the cleanup and range reopening. It also would not be physically safe for cleanup workers to be present on a live firing range. Prior to reopening, the range must be modified so that lead can be captured and collected regularly. Whatcom County is doing their best to clean up, redesign, and return a more functional and more environmentally responsible range to the community.

We realize that a lack of safe, well-designed places to shoot pushes people into wilderness areas to practice. Ecology is working with Whatcom County to provide a safe and well-designed range that is protective of the environment.

## **Comment from: Gabe Ng**

### **Comment I-51-1**

Please clarify why the range is shut down while this assessment is on going? The contamination doesn't appear to be life threatening or environmentally threatening. On going use of the park

should be allowed while this laborious process will take years. Park users have very few options to safely use firearms and now are being forced to use public lands and private property to discharge firearms which provide far less safety constraints to safely use and discharge firearms. The risk and threat to human health and safety by closing the range far exceeds the below levels of lead in groundwater tested. Please consider the societal and social impacts this has with closing the range. If there was another park in the county with contamination issues with no immediate risk to users would you shut it down? Bloedel Donovan Park is a source of phosphorus which has environmental impacts but isn't closed to users...

## Response

Lead contamination has been detected in the soil in all outdoor shooting lanes and in the surface water of the onsite wetlands and Ruby Creek. Soil samples collected across the site have shown lead concentrations harmful to human health. Samples that were collected from Ruby Creek showed lead concentrations at levels harmful to fish and aquatic life.

Contamination at Plantation Rifle Range must be cleaned up to protect human health and the environment.

It may seem logical that people could continue shooting and adding lead contamination to the site, because the cleanup hasn't occurred yet. However, we currently have workers sampling soil and determining the extent of the cleanup, which is necessary before we can design the cleanup and obtain bids on the work. If we allow people to continue shooting, lead may accumulate in new places. This would require the sampling work to be redone or expanded, which would further delay the cleanup and range reopening. It also would not be physically safe for cleanup workers to be present on a live firing range.

Ecology understands that the public values the range as a community resource. To reopen the range, Whatcom County must make changes to prevent new environmental impacts. The County intends to redesign and reopen an improved range for public use, pending available funding.

Bloedel Donovan Park previously had high phosphorus and fecal contamination in stormwater because of lawn runoff and dog access. The Bloedel Donovan Park stormwater system was retrofitted in 2015 to remove phosphorus and fecal contamination from stormwater before discharging to Lake Whatcom. For more information regarding the stormwater retrofit, please visit the [Lake Whatcom Management Program website](https://www.lakewhatcom.whatcomcounty.org/our-programs/capital-projects/bloedel-donovan).<sup>30</sup>

## Comment from: Tim Surratt

### Comment I-52-1

I am sure that a good plan for removing the toxic material will be developed. Once that is done, what will be done to insure that this is not a recurring problem. For example, the Custer Sportsman's Club uses sand for all berms and shooting areas, which can be then sieved to remove the lead and other materials. I believe the Skagit Indoor range does the same or similar.

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<sup>30</sup> <https://www.lakewhatcom.whatcomcounty.org/our-programs/capital-projects/bloedel-donovan>

My real concern is that the Whatcom Parks Department has consistently reduced staff at the range and has made the management of the facility only a part-time job for one manager. To maintain a program of constantly removing material from the backstops and ground, maintaining the backstops, and insuring safe operation, seems to be beyond the skill set and staffing level of the Whatcom County Parks Department. For example, many ranges use an upper barrier of some kind, typically wood beams, to insure that no bullets go above the back stops. No such facility exists at the Plantation range. The focus of the Dept of Ecology is, rightfully, on mitigation of the existing issue. Planning for avoiding future issues does not, at least in my reading, to be a part of the process. I would ask whether it is in the scope of the project to insure that after the material removal is complete, that the County be held to a plan to prevent to the degree possible the reoccurrence of the issue. I feel that will add to significant additional cost which is not being foreseen, again as best I can tell.

## Response

We are working with Whatcom County to provide a safe and well-designed range for shooting practice—one that also protects our wildlife areas. The new range will have to be designed and equipped to ensure that all bullets fired end up in the collection containment. Bullet collection technologies, monitoring, and maintenance will be a central part of this design.

## Comment from: Anne Cantrell

### Comment I-53-1

Hi , I would like to request a public meeting for the purpose of discussing the Draft Permit and the Draft Public Participation Plan for Plantation Rifle Range as soon as possible.

A public meeting is being requested because of the importance of the plan and the finality that occurs based on the comments from these documents. I would like to have a forum whereby we can ask questions and receive accurate information.

Thank you and I look forward to hearing from you.

Regards, Anne Cantrell

## Response

We appreciate the request for a public meeting. A public meeting was held on June 20, 2024, to discuss progress at this site and the corrective action permit. Additional public meetings will be held periodically during the cleanup process. Additional public comment periods will be held during the cleanup process, including at the publishing of the draft remedial investigation, feasibility study, and cleanup action plan, and when the site is ready for delisting as a contaminated site.

## Comment from: Allen H

### Comment I-54-1

I'm Pro gun and Pro 2nd Amendment but I think it's time to shut down the PRR. The pollution should be cleaned up and the range shut down. There's enough private ranges (indoor) avail to fill the needs of the public. The County doesn't need to be in the business of providing a shooting range.

Allen H.

### Response

Ecology is committed to making sure contamination at this site is cleaned up without delay. The cleanup gives the County an opportunity to assess, redesign, and redevelop the outdoor ranges. Without access to an appropriate outdoor range, sportsmen and women will practice in other areas, unmanaged for shooting activities. This can pose health and safety risks for other members of the public. We prefer that shooting practice be done where the bullets can be collected.

## Comment from: Kyle Young

### Comment I-55-1

Hi Janelle,

I would like to formally request a public meeting relating to the Plantation Rifle Range contamination issue. Given the safety risks of the contamination, and the safety risks around shooting in a densely utilized land area (housing, recreation, etc) we need to make this process more out in the open for the public to weigh in. While i have significant concerns as a resident near the range, i have even greater concerns as i operate my business across the street from the range.

respectfully,

-Kyle

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KYLEYOUNG | owner

TRANSITION BICYCLE COMPANY | ANVL COMPONENTS

### Response

We appreciate the request for a public meeting. A public meeting was held on June 20, 2024, to discuss progress at this site and the corrective action permit. Additional public meetings will be held periodically during the cleanup process. Additional public comment periods will be held during the cleanup process, including at the publishing of the draft remedial investigation, feasibility study, and cleanup action plan, and when the site is ready for delisting as a contaminated site.



## Comment from: Nancy Cullinane

### Comment I-56-1

Hi,

I'd like to comment that I really appreciate the Dept of Ecology notice (Pub 24-04-018) mailed to my house, as well as the previous publications keeping us informed about what's happening with the cleanup.

I am a Lake Samish resident and was mortified when I first learned about the lead contamination.

One of my children, now a young adult, (who grew up on Lake Samish drinking water) has loads of autoimmune/health issues and although we will never know exactly what turned those genes on, I wonder.

Thank you for keeping us informed.

Nancy Cullinane

### Response

Ecology is committed to making sure contamination at this site is cleaned up without delay. We will continue to send public notices and fact sheets and hold public comment periods and meetings.

## Comment from: Jim Hartl

### Comment I-57-1

Hi Janelle,

I am interested in learning more about the soil lead level testing for this site. I do not see any testing documents on the website other than the initial water tests.

Would you be able to share this document?

Thanks,

Jim Hartl

### Response

The County is currently working on the remedial investigation and feasibility study report, which will include the soil, surface, and groundwater sampling results and the proposed plan for cleanup at the site. Once complete, this draft report will be featured on the [Ecology Plantation Rifle Range webpage](#)<sup>31</sup> and we will have a public comment period to collect community feedback.

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<sup>31</sup> <https://apps.ecology.wa.gov/cleanupsearch/site/15182>

## **Comment from: Bernadette Prinster**

### **Comment I-58-1**

Hello, I read the brochure and could not find anything that clearly states the cause of the pollution. I ASSUME it's lead from bullets. Also, I could not find anything that said once this site is cleaned up, will it be returned to same use? and what will mitigate pollution occurring again, assuming it's lead shot or contaminants from guns.

Thanks for responding.

### **Response**

Improper design and maintenance of the range has resulted in soil and surface water contamination from lead in the accumulated bullets. Whatcom County is working to redesign the range to prevent environmental impacts. They intend to reopen an improved range for public use, pending available funding. The new range will have to be designed and equipped to ensure that all bullets fired end up in the collection containment. Bullet collection technologies, monitoring, and maintenance will be a central part of this design.