



## **RESPONSIVENESS SUMMARY**

**Sunnydell Dryke Shooting Range**  
**May 2 – June 3, 2013 Public Comment Period**

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***Agreed Order***  
***Draft Cleanup Action Plan***

Prepared by  
Washington State Department of Ecology  
Southwest Regional Office  
Toxics Cleanup Program  
300 Desmond Drive  
Olympia, Washington 98504-7775

**June 2013**

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## Introduction

The Department of Ecology (Ecology) held a public comment period May 2 – June 3, 2013 on cleanup plans for Sunnydell Dryke Shooting Range.

The following documents were available for public review and comment:

- The **Remedial Investigation/Feasibility Study (RI/FS) report**—Describes the nature and extent of contamination and evaluates possible final cleanup options.
- The **Draft Cleanup Action Plan (draft CAP)**—Describes how the owners of the site will clean up contamination. The cleanup plan includes removal of soil and sediment from the lower pond, maintaining a soil berm, implementation of Best Management Practices, periodic led recycling, and periodic reviews.
- **State Environmental Policy Act (SEPA) Determination and Checklist**—Describes the potential negative impacts of the cleanup work and how they will be lessened.
- An **Agreed Order** – Updates the original legal agreement between Ecology and the owner. It requires the owner to carry out the CAP.

Public comments and Ecology’s responses are summarized in this document.

## Site Location

Sunnydell Dryke Shooting Range is located at 292 Dryke Road in Sequim. It is an active shooting range.



## **Format of the Responsiveness Summary**

Ecology reviewed all comments received. Comments from different reviewers often covered the same topics. We grouped and responded to common concerns, as well as many other comments and questions. The rest of this responsiveness summary is organized into the following sections:

- Changes to the Site Documents
- Summary of Public Involvement
- List of Commenters
- Acronyms and Abbreviations
- Responses to Common Concerns
- Appendix A: Comment Letters

## **Changes to the Site Documents**

Based on comments we received, Ecology will not be making changes to the RI/FS report, draft CAP, or agreed order.

## **Summary of Public Involvement**

Ecology used the following notices to advertise the comment period:

- Fact sheet mailer – Sent to about 200 neighboring residents and stakeholders.
- Email announcement – Sent to about 20 interested residents and stakeholders.
- News release
- Website - <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=3572>
- Other - Notices on Ecology's Public Involvement Calendar and Site Register. Legal ads in the *Peninsula Daily News* and the *Sequim Gazette*.

## **Contacts**

Guy Barrett, Site Manager  
Washington Department of Ecology  
PO Box 47775  
Olympia WA 98504-7775  
(360) 407-7115  
[Guy.Barrett@ecy.wa.gov](mailto:Guy.Barrett@ecy.wa.gov)

Diana Smith, Public Involvement Coordinator  
Washington Department of Ecology  
(360) 407-6255  
[Diana.Smith@ecy.wa.gov](mailto:Diana.Smith@ecy.wa.gov)

## List of Commenters

Date	Name
5/2/2013	Dale W. Luther, Jr.
5/3/2013	Art Tordini
5/5/2013	David Dalton
5/5/2013	Josey Paul
5/6/2013	Burt Fraley
5/6/2013	Will Melicott
5/7/2013	William Paulbitski
5/7/2013	Lynn A. Johnson
5/8/2013	Don Clayton
5/8/2013	Sue Chickman and Bob Lynette
5/9/2013	Larry Gorman
5/11/2013	Mike Jew
5/12/2013	Bob Sextro
5/13/2013	Vicki Tallman
5/15/2013	Gary Caswell
5/17/2013	Dale Luther, Sr.
5/17/2013	Tim Ehlenberger
5/19/2013	Larry Dunbar
5/20/2013	Jane Burkey
5/22/2013	Mary Pogue
5/23/2013	Donna & James M. Nelson
5/23/2013	Laurie Tenguay
5/27/2013	Bart Gallant
5/27/2013	Richard Covert
5/27/2013	Richard Covert
5/27/2013	Michael Crowder
5/29/2013	Jaiden Grinnell
5/29/2013	Darlene Jackson Marmol
5/30/2013	Robie and Nancy Robinson
5/30/2013	Jack Scher
5/30/2013	Neal Christensen
5/31/2013	Glenn Wiggins
5/31/2013	Curtis Baxstrom
5/31/2013	Bryan Caditz
6/2/2013	Joe Mass
6/2/2013	William Dickerson
6/2/2013	Dr. Robert L. Brown and family
6/2/2013	William Fransen
6/3/2013	Tony and Betty Joslyn
6/3/2013	Kirke Lisi
6/3/2013	Craig Kerschen
6/3/2013	Lincoln Thompson

6/3/2013	Jeff Pogue
6/3/2013	Ross Brown
6/3/2013	Mark Rubbert
6/3/2013	David M. Christopher

## **Acronyms and Abbreviations**

ATSDR	Agency for Toxic Substances and Disease Registry
BMPs	Best Management Practices
dCAP	draft Cleanup Action Plan
Ecology	Washington State Department of Ecology
MTCA	Model Toxics Control Act
PAHs	polycyclic aromatic hydrocarbons
RI/FS	Remedial investigation and feasibility study
WAC	Washington Administrative Code

## Responses to Common Concerns

### Importance of Sunnydell Dryke Shooting Range

Several commenters discussed the importance Sunnydell Dryke Shooting Range has for the community and the role that using the shooting range has played in their lives. Commenters discussed the instruction offered, their accomplishments, and the dog kenneling and training offered at the shooting range. Some commenters noted that, while they have used the shooting range for years or had their dogs kenneled at the shooting range for weeks, they have not noticed any negative health effects.

Some commenters also noted the importance of shooting ranges in keeping people from shooting in random locations without any controls.

**Ecology Response:** Thank you for your comments. We recognize the importance of this business to the community.

Ecology works with owners of both active and inactive gun ranges to clean up their sites. Our primary goal is to help protect the health of the people who go on to active sites to practice their shooting, who may be unaware of contamination, and to help address neighbors' concerns about environmental and safety issues associated with both active and inactive ranges.

Sunnydell Dryke Shooting Range's owners have worked cooperatively with Ecology to reach compliance with the state's cleanup regulations, called the Model Toxics Control Act.

### Importance of Cleanup

Several commenters stated that it is important that Ecology work with the shooting range owners to clean up the site and resolve environmental/cleanup issues in the best interest of the public, the owners, and customers. Some commenters noted potential health effects of lead exposure.

**Ecology Response:** Thank you for your comments. Ecology works with owners of both active and inactive gun ranges to clean up their sites. Our goal is to help protect the health of the people who go on to active sites to practice their shooting, who may be unaware of contamination, and to help address neighbors' concerns about environmental and safety issues associated with both active and inactive ranges. Gun ranges can pose environmental damage and immediate risks to human health. In such cases, cleanup is important because toxins found in and around gun ranges can harm human health and the environment.

Sunnydell Dryke Shooting Range's owners have worked cooperatively with Ecology to reach compliance with the state's cleanup regulations, called the Model Toxics Control Act.

## Is Cleanup Needed?

Several commenters questioned whether the shooting range needs to be cleaned up. One commenter questioned how contamination was originally found on the shooting range.

**Ecology Response:** Thank you for your comments. We recognize the importance of this business to the community. Gun ranges can pose environmental damage and immediate risks to human health. In such cases, cleanup is important because toxins found in and around gun ranges can harm human health and the environment.

Ecology works with owners of both active and inactive gun ranges to clean up their sites. Our goal is to help protect the health of the people who go on to active sites to practice their shooting, who may be unaware of contamination, and to help address neighbors' concerns about environmental and safety issues associated with both active and inactive ranges.

Sunnydell Dryke Shooting Range's owners have worked cooperatively with Ecology to reach compliance with the state's cleanup regulations, called the Model Toxics Control Act. Ecology first became involved with this site due to a complaint. An initial investigation by the Clallam County Health and Human Services, the local health department, indicated that hazardous substances were present above cleanup levels.

The owners signed an agreed order to investigate the site and consider cleanup alternatives in a feasibility study, and these steps have been completed. The remedial investigation found lead and PAHs above state cleanup levels.

- Information about lead from the Agency for Toxic Substances and Disease Registry (ATSDR): <http://www.atsdr.cdc.gov/toxfaqs/tf.asp?id=93&tid=22>
- Information about PAHs from ATSDR: <http://www.atsdr.cdc.gov/substances/toxsubstance.asp?toxid=25>
- Sunnydell Dryke Shooting Range cleanup plan (see pages 4 – 7 for a summary of contamination): <https://fortress.wa.gov/ecy/gsp/DocViewer.ashx?did=19937>

## General Management/Cleanup Approach

Some commenters expressed support for the approach taken in the draft cleanup plan, which they felt would ensure the shooting range stays open during cleanup. Some commenters stated they support the shooting range continuing operations with limited or no restrictions. Some other commenters were concerned that Ecology is considering closing the shooting range.

**Ecology Response:** Thank you for taking the time to comment. The cleanup action plan requires the owners to partially clean up and periodically recycle lead to reduce the spread and buildup of lead and PAHs; contain shooting to active shooting areas; implement Best Management Practices (BMPs); and record an environmental covenant. A periodic review every five years will ensure continued protection of human health and the environment.



This balanced approach will meet state environmental regulations and allow the business to continue with minor impact. Ecology has never said that we are going to close the facility.

## **EPA Best Management Practices**

Several comments requested that the cleanup plan be changed to incorporate all of the US Environmental Protection Agency's (EPA) *Best Management Practices for Lead at Outdoor Shooting Ranges*. They requested that these be adopted as minimum operating standards for Sunnydell Dryke Shooting Range.

**Ecology Response:** The cleanup plan includes the EPA Best Management Practices (BMPs) most applicable to this site. Using the selected BMPs will ensure protection of human health and the environment.

You can read the EPA BMP manual at <http://www2.epa.gov/lead/best-management-practices-lead-outdoor-shooting-ranges>.

## **Shooting Areas**

Several commenters wrote in favor of using institutional controls to ensure that shot is confined to specific parts of the property. Some commenters noted that the shooting range enforces shooting practices so that shells don't leave the property.

**Ecology Response:** The cleanup action plan requires the owners to contain shooting to active shooting areas. You can find a map of the property with active shooting areas on page 16 of the cleanup action plan at <https://fortress.wa.gov/ecy/gsp/DocViewer.ashx?did=19937>.

## **Children Visiting the Shooting Range**

Several commenters expressed concern that they have seen neighborhood children at the shooting range and stated their support for cleanup. Some commenters were concerned that the cleanup plan to protect children is too weak. One recommendation was that children not be allowed into contaminated areas at the shooting range. The commenters also recommended that fencing be erected to prevent neighborhood children from entering contaminated areas.

**Ecology Response:** As part of the Best Management Practices that the owners will implement as part of the cleanup plan, children will not be allowed to sit or play on the ground, sediment, or water in active shooting ranges. Other management activities require that the owners not bring soil from the active shooting areas or lower pond area into the non-shooting area. In addition, children from outside of this facility have not been observed at this site by Ecology or the owner's consultant.

## Sampling for Arsenic

Several commenters asked for Ecology to require sampling for arsenic, a well-known contaminant of shooting ranges.

**Ecology Response:** Arsenic is a trace component of shot and is used as a hardening agent. Research into arsenic at shooting ranges indicates that it is not a major concern (Bannon 2009; EA Engineering 2004; Sneddon 2009; Tsuji 1998); two studies found some minor increase in arsenic but within background levels (Sneddon 2009; Tsuji 1998). All of the studies indicate arsenic below MTCA cleanup levels except one in Alaska (Tsuji 1998).

When the lead shot at Sunnydell Dryke is recycled, the arsenic in that shot will be removed as well. The cleanup action plan is essentially a management plan and does not describe a complete cleanup. Arsenic will continue to be present to some extent as shooting activities continue. If a different future use of this shooting range should be proposed, a complete cleanup will be necessary. Such a cleanup will include testing for arsenic.

## Lead Contamination

One commenter asked where lead contamination was found and whether it was in scooped up samples of lead shot or in water.

**Ecology Response:** Lead and cPAHs were found in the active shooting areas of the Site, primarily in the upper one foot of soil. The contaminants were not found in ground water or surface water at levels of concern.

## Upper Pond

Some other commenters expressed concern over the upper pond, which is hydraulically connected with groundwater that serves the broader community. The commenters requested that the cleanup plan restrict shooting into the upper pond, or limit the type of shot used at the upper pond. They noted that recycling lead from the pond is a mitigating strategy, not a solution, and further spreads fine particles.

Commenters also opposed one of the proposed cleanup options that involved killing all the fish in the upper pond.

**Ecology Response:** After almost 50 years of operation as a shooting range, groundwater is not contaminated with lead or PAHs above state cleanup levels. As part of the BMPs that the owners will implement as part of the cleanup plan, the owners will use biodegradable targets when possible. Just prior to Ecology's periodic review in five years, the owners will sample and analyze groundwater to ensure contamination is not present above cleanup levels.

The cleanup action plan is essentially a management plan and does not describe a complete cleanup. If a different future use of this shooting range should be proposed, a complete cleanup will be necessary.

One cleanup option described in the remedial investigation/feasibility study called for poisoning any fish in the upper pond and prohibiting adding more fish. However, there is no fishing at the upper pond and there is no evidence of fish being affected by site contaminants. Killing the upper pond fish is not justified and the draft cleanup plan did not carry this recommendation forward.

## **Type of Shot and Targets**

Several comments stated that the management plan should only allow use of non-toxic shot and targets on the shooting range.

**Ecology Response:** The draft cleanup plan does not require the use of non-toxic targets. However, biodegradable targets are preferred over targets made from pitch. As part of the BMPs that the owners will implement as part of the cleanup plan, the owners will use them when economically and practically feasible.

## **Groundwater**

Several commenters stated that no one has gotten sick from drinking well water at the shooting range. One commenter noted that the Solmar Water District wells are above and west of the shooting range.

**Ecology Response:** After almost 50 years of operation as a shooting range, groundwater is not contaminated with lead or PAHs above state cleanup levels. Rather, in the past lead was found in pond water. Lead has not been found in recent water samples. The lead found in pond water samples in the past was likely due to contaminated sediment floating in the water.

Just prior to Ecology's periodic review in five years, the owners will sample and analyze groundwater to ensure contamination is not present above cleanup levels.

## **Paying for Cleanup**

Several commenters expressed concerns over how the shooting range owners would pay for the investigation and cleanup. One commenter expressed concern over the impact that the cleanup process had on Chuck Dryke, the former shooting range owner.

Some other commenters expressed concern that cleanup will force the shooting range to close, either because of the technical requirements of cleanup or because of the financial burden of

cleanup. One commenter said he was concerned that the cleanup plan did not show the cost of the selected cleanup option, and the others considered.

**Ecology Response:** We recognize the importance of this business to the community. The owners have worked cooperatively with Ecology to reach compliance with state cleanup regulations. The owners have agreed to implement the cleanup plan under a new cleanup agreed order. The selected remedy should have minimal impact on their business while protecting human health and the environment. Ecology and the current owner have also agreed to a monthly installment plan to pay for Ecology oversight costs.

## **Remedial Action Work Plan**

One commenter asked when the remedial action work plan (RAWP) will be available for public review and comment.

**Ecology Response:** The agreed order for cleanup became effective when Ecology signed it June 27, 2013. The draft RAWP is due to Ecology for review within 60 days following the effective date of the order. Ecology will not hold a public comment period on the draft RAWP, but when it is finalized we will post it to our website at <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=3572>.

## References

Bannon, D., Drexler, J., Fent, G. et al. 2009. Evaluation of small arms range soils for metal contamination and lead bioavailability. *Environmental Science & Technology*, 43, 9071-9076.

EA Engineering, Science, and Technology, Inc. 2004. Index Sportsmen's Club – Final field investigation report Mt. Baker-Snoqualmie National Forest. April.  
[http://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5338130.pdf](http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5338130.pdf)

Sneddon, J., Clemente, R., Riby, P., Lepp, N. 2009. Source-pathway-receptor investigation of the fate of trace elements derived from shotgun pellets discharged in terrestrial ecosystems managed for game shooting. *Environmental Pollution* 157, 2663-2669.

Tsuji, L. and Karagatzides, J. 1998. Spent Lead Shot in the Western James Bay Region of Northern Ontario, Canada: Soil and Plant Chemistry of A Heavily Hunted Westland. *Wetlands*, Vol. 18, No. 2., 266-271.

## **Appendix A: Comment Letters**

**From:** Dale Luther  
**Sent:** Thursday, May 02, 2013 10:19 AM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunnydell

Dear Mr. Barrett,

I am an avid shooter and frequent guest at Sunnydell Shooting Grounds. I'm aware of the surveys/studies taken and the actions by Sunnydell to meet all ecological requirements. My father and I have been visiting the shooting range since 1969 and during that time have known the owner(s) and family of the establishment. Based on this legacy it is clear to me that they will do whatever is necessary to resolve the issues and have already implemented a plan and started work on corrective action to maintain suitable controls on the issues identified.

I feel it is necessary to have a safe and controlled area for shooters of all shooting disciplines available on the Olympic Peninsula and Sunnydell provides that resource. It is necessary to resolve any ecological concerns in a manner that is reasonable and in the best interest of all parties involved including the Sunnydell proprietors, customers and surrounding public.

I am in support of Sunnydell Shooting Grounds and in maintaining the property access and shooting activities that they provide.

Best regards,

Dale W. Luther Jr.  
1507 South E. Street  
Port Angeles, WA 98363  
360-457-5779

**From:** Art Tordini  
**Sent:** Friday, May 03, 2013 2:20 PM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunnydell shooting facility

I am writing to support the agreed to plan for Sunneydell Shooting Facility. The plan addresses the concerns of nearby properties and allows us to keep this valuable facility open to the public into the foreseeable future. This facility is a valued public venue for our community and all efforts at keeping it open should be made.

Thank you.  
Art Tortini



**From:** Josey Paul  
**Sent:** Sunday, May 05, 2013 1:51 PM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunnydell comment letter

May 5, 2013

Guy Barrett, Site Manager

Department of Ecology

State of Washington

SWRO Toxics Cleanup Program

*(transmitted via email)*

Re: Sunnydell Dryke Shooting Range Draft Cleanup Plan

Dear Mr. Barrett:

Thank you for coordinating the cleanup plan for the Sunnydell Shooting Range in Sequim. This site has high levels of toxic contamination and a history of being used as play area by neighborhood children. Hazardous wastes from multiple toxins – many of them carcinogens with synergistic interactions – have built up quickly since the range was opened in the 1960's. According to Clallam County's Department of Health and Human Service, this site has a "long history of water quality and hazardous waste complaints," including a veterinarian's report that found elevated levels of lead in the muscle tissue of cattle that graze immediately down slope from the shooting range.

I appreciate the professional effort that went into your draft cleanup plan. However, there are four areas that concern me:

- 1) No testing was done for arsenic, a well-known contaminant of shotgun ranges.
- 2) The plan to protect children from toxic waste is too weak.
- 3) Too little consideration is given to the danger posed by the continued shooting of lead shot and toxic targets into the upper pond. That pond is in hydraulic continuity with groundwater that serves the broader community.
- 4) The plan does not adopt – or even acknowledge – well-accepted, cost-effective and science-based best management practices for range operations going forward.

## **Arsenic:**

The draft cleanup plan makes no mention of arsenic, even though this range is primarily used for shotguns. Shotgun pellets typically contain 1 percent arsenic. The arsenic is used as a hardening agent in the formation of the shot. Other shotgun sites, such as the Index Sportsmen's Club on U.S. Forest Service land in Mt. Baker-Snoqualmie National Forest, contain high levels of arsenic concomitant with elevated levels of both PAH's and lead. In areas of the Index range where lead contamination is highest, arsenic contamination is also highest – well above background levels and many times higher than MTCA A standards for industrial sites.

LaManna Geoscience's remedial investigation reports that approximately 100 tons of lead shot have fallen into the upper pond on the Sunnydell range. So roughly one ton of arsenic has also fallen into that pond. The pond is in hydraulic continuity with groundwater.

Arsenic is certainly present on this site, and arsenic is co-mutagenic with PAHs, making their combined presence especially hazardous. For example, peer-reviewed studies show that arsenic in the Athabasca River in the tar sands region of Canada interacts with PAH's to increase the cancer risk to fish by a factor of 10.

LaManna's assertion that PAHs are not toxic to fish is incorrect, especially when arsenic and PAHs are found together. Studies of the Ohio River, Chesapeake Bay and Puget Sound have linked PHA exposure to bile-duct cancer in fish.

The Sunnydell cleanup plan cannot be complete without an investigation into the presence and spread of arsenic.

## **Children:**

The cleanup plan calls for limiting toxic exposure to children visiting the range by prohibiting them from "sitting or playing on the ground." This recommendation is too weak. Children should not be allowed into contaminated areas. The risk to young brains and bodies is too great, and children lack the maturity to understand the risks. Fencing should be erected to prevent neighborhood children from entering these areas. Protections should also extend to dogs, which will be actively working in highly contaminated areas, exposing themselves and their owners to lead and other toxins.

## **Upper Pond:**

According to the *Site Characterization Report (LGI, 2011b)*, "high concentrations of lead and PAHs in the Upper Pond sediment do not warrant further investigation at this time because the Site is an active shooting range, and lead and PAHs can be expected to occur everywhere throughout the sediment column overlying the hardpan pond bottom."

No shooting of lead should be allowed into the upper pond because it is in hydraulic continuity with groundwater. Only steel or other non-toxic shot and non-toxic targets should be allowed to reach this pond. There is every reason to believe that lead has already migrated into shallow groundwater. The neighbor to the north has pasture land contaminated with lead, even at depths of 3 feet. While this lead contamination (180 ppm) falls just below the action level, that contamination is well above background levels and is likely to continue to rise. LaManna misses the point when it says that groundwater samples are below action levels. The point is that groundwater contamination is well above background levels and approaching action levels. To continue current practices will ensure that groundwater becomes contaminated in the future at levels that do require action. Unfortunately, there is no practical way to clean up the groundwater.

The range has been in operation for about 40 years, and typically it takes longer for lead and other toxins seeping off site to reach actionable levels. Sunnyside is in the early stages of contaminating a broad area of neighboring property and groundwater. The U.S. Environmental Protection Agency recently found a plume of lead leaching off an abandoned range in Salt Creek Park, slowly approaching action levels and about to reach the strait, where the EPA said it threatened shellfish beds. The Salt Creek range is roughly two decades older than the Sunnyside range. As toxins fan out and travel through shallow groundwater, the potential cleanup becomes progressively more difficult. Prevention should be the key strategy for blocking the spread of lead, PAHs and arsenic.

Recycling lead from the pond and other areas is a mitigating strategy, but not a solution. Only a fraction of the lead can be recovered. Many particles of lead are too fine to be recovered. Rainwater is acidic – typically 5.3 pH and falling as atmospheric CO<sub>2</sub> levels rise. At that level of acidity, the non-recoverable levels of lead contamination in soil will continue to rise. In many parts of the range, shot outfall drops into heavily treed areas of the range, making commercial lead recovery impossible. And the recycling activity itself further spreads fine particles. It is important to keep lead out of water and groundwater, and the range has reasonable alternatives – non-toxic shot and targets – to prevent this contamination.

The draft plan envisions poisoning the upper pond to kill any fish present. The theory is that killing off fish will block a pathway for lead to reach people and wildlife. This is a bad plan. Even if all the fish are killed, wildlife – such as ducks and geese – would be vulnerable to lead shot. Songbirds and other wildlife would be vulnerable to toxins reaching them through lower portions of the food chain. Frogs will quickly repopulate the area and become toxic food for herons. And the poison would have a direct pathway to groundwater.

A better approach is to remove toxins from the upper pond and prevent further contamination by requiring the use of non-toxic shot and targets. The US Fish & Wildlife Service has approved many economically viable alternatives to lead shot, such as bismuth, steel, tungsten/iron and tungsten/polymer shots.

### **Best Management Practices:**

The management plan for the range falls far short of the reasonable standards set forth in the EPA's *Best Management Practices for Lead at Outdoor Shooting Ranges*. Although these standards are voluntary, they were developed by the EPA in cooperation with all 50 states and major shooting groups. These BMP's should be adopted as minimal operating standards for Sunnyside because of the range's history of mismanaging hazardous waste in a populated area. The BMPs contain many strategies for managing a shooting range in a responsible manner, as well as providing contacts for experts and companies that offer environmental services for shooting ranges.

The link to the EPA's BMPs is:

[http://www2.epa.gov/sites/production/files/documents/epa\\_bmp.pdf](http://www2.epa.gov/sites/production/files/documents/epa_bmp.pdf)

Thank you for your efforts to protect the health of our community and for giving the public an opportunity to comment on your draft plan.

Sincerely,

Josey Paul

**From:** David Dalton  
**Sent:** Sunday, May 05, 2013 2:26 PM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** drykes

The Dryke family has been providing a safe, controlled, family oriented shooting facility for generations. I would like to see the facility continue for many generations to come, and with luck another great champion will represent the U.S. that used the Dryke facility as a training platform.

David Dalton  
378902 S.E. North bend Way.  
Snoqualmie Wa. 98065

**From:** Burt Fraley  
**Sent:** Monday, May 06, 2013 9:06 AM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunnydell shooting grounds

Mr. Barrett. I have been shooting at the sunnydell shooting ground since the mid eighties. I have shot all over the world and have never seen a cleaner shooting facility as sunnydell. Thank you for working with the Drykes to keep sunnydell operating. if you wish to speak with me personally i can be reached at 206 999 7787                      Respectfully yours Burt Fraley

**From:** Will Medicott  
**Sent:** Monday, May 06, 2013 9:28 AM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Dryke Shooting Range [Sunnydell]

I believe the proposed cleanup plan to be adequate to protect public health and should be approved and implemented. This range has provided many years of public access to the shooting sports and is a beneficial and useful part of the community and should be preserved. I fully support the continued use of this property as a shooting range open to the public and believe the proposed cleanup is all that is required.

William Medicott  
Stanwood, WA  
[willmed@msn.com](mailto:willmed@msn.com)

**From:** William Paulbitski  
**Sent:** Tuesday, May 07, 2013 6:50 AM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunnydell Shooting Grounds - Sequim

We have been shooting at Dryke's Sunnydell Shooting Grounds for several years. The Drykes have and continue to make serious efforts to clean up the grounds to comply with DOE and to instruct shooters to be very conscious of the environment.

They enforce the use of low power shot shells to make sure that lead does not fall outside of their area. Matt Dryke is an Olympic Champion and his facility continues to draw shooters from outside of the Sequim community which helps stimulate our local economy.

We appreciate the DOE's efforts to work with the Drykes with the cleanup of this facility.

William A. Paulbitski  
171 Stares Lane  
Sequim, Wa 98382



**From:** Lynn  
**Sent:** Tuesday, May 07, 2013 9:08 PM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Comment re: Dryke's Sunnydell Shooting Grounds

**I have been a customer of Dryke's Sunnydell Shooting Grounds for the last several years, ever since my dad left me his old shotgun. It was very convenient to have a local, controlled environment with expert instructors available while I was learning to shoot. While I was shooting, I asked them about all the lead that was accumulating on the grounds, and they referred me to the work they were doing with the DOE.**

**After reviewing the DOE report I was very pleased that the testing results showed no ground water contamination, and believe that the Draft Cleanup Action Plan Jan 2013 is an adequate approach to the containment of the lead. I believe that it is better to have a controlled and contained area to shoot rather than going out into the forest and spreading lead around the wild areas.**

**The Sunnydell Shooting Grounds provides the sports shooting community with a unique setting not available anywhere else on the peninsula, and draws many customers into this area which helps the local economy. I'm glad that they are working with the DOE to keep this facility viable.**

**Lynn A. Johnson  
610 W Spruce St Spc 131  
Sequim, WA 98382**

**From:** Don Clayton  
**Sent:** Wednesday, May 08, 2013 6:58 AM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** cleanup?

I see that dept of ecology is at it again to help BO destroy our country from within. As a kid, I often collected lead and melted it in my yard in eastern Oregon. I also would chew on .22 bullets and use mercury to shine up our real silver dimes and quarters. I suppose this has shortened my life and damaged my brain cells so that I am now mentally challenged and will be asked , read TOLD, to take pain meds until I reach the end of my life rather than getting meds to maintain my life. One more reason to not trust government officials at all. Semper Fi, Don Clayton

**From:** Bob Lynette  
**Sent:** Wednesday, May 08, 2013 10:34 PM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunnyside Dryke Shooting Range Comments  
**Attachments:** Comment on Draft Plan Cleanup Plan for Sunnyside Dryke Shooting Range.doc

Please include the attached comments in your consideration of the adequacy of the subject.

Bob Lynette & Sue Chickman  
220 Strawberry Field Drive  
Sequim, WA 98382

May 8, 2013

Guy Barrett, Site Manager  
Department of Ecology  
State of Washington  
SWRO Toxics Cleanup Program

*(transmitted via email)*

Re: Comment on the Sunnyside Dryke Shooting Range Draft Cleanup Plan

Dear Mr. Barrett:

Thanks to the DOE for producing a draft cleanup plan for the Sunnyside Shooting Range. This site has a proven record of high levels of toxic contamination and has the potential to expose people to the toxins. Children are especially vulnerable, and access to the site is not monitored. We have several areas of concern that we hope you will include and address in the final plan.

- 1) There has been no testing conducted for arsenic, a well-known contaminant of shotgun ranges. Please include a test for this prior to cleaning the area up...and afterwards as well. The Sunnyside cleanup plan cannot be complete without an investigation into the presence and spread of arsenic.
- 2) The plan to protect children from toxic waste is too weak. Children should not be allowed into contaminated areas.
- 3) Too little consideration is given to the danger posed by the continued shooting of lead shot and toxic targets into the upper pond. That pond is in hydraulic continuity with groundwater that serves the broader community. No shooting of lead should be allowed into the upper pond.
- 4) The plan does not adopt well-accepted, cost-effective, and science-based best management practices (BMP's) for range operations going forward. Please add this into your plan. These BMP's should be adopted as minimal operating standards for Sunnyside

We have read and agree with Mr. Josey Paul's comments on these issues and wish to incorporate them into our comments. They are attached to this comment letter.

Thank you,

Sue Chickman and Bob Lynette  
220 Strawberry Field Drive  
Sequim, WA 98382

### **Comments from Josey Paul's comment letter**

#### **Arsenic:**

The draft cleanup plan makes no mention of arsenic, even though this range is primarily used for shotguns. Shotgun pellets typically contain 1 percent arsenic. The arsenic is used as a hardening agent in the formation of the shot. Other shotgun sites, such as the Index Sportsmen's Club on U.S. Forest Service land in Mt. Baker-Snoqualmie National Forest, contain high levels of arsenic concomitant with elevated levels of both PAH's and lead. In areas of the Index range where lead contamination is highest, arsenic contamination is also highest – well above background levels and many times higher than MTCA A standards for industrial sites.

LaManna Geoscience's remedial investigation reports that approximately 100 tons of lead shot have fallen into the upper pond on the Sunnydell range. So roughly one ton of arsenic has also fallen into that pond. The pond is in hydraulic continuity with groundwater.

Arsenic is certainly present on this site, and arsenic is co-mutagenic with PAHs, making their combined presence especially hazardous. For example, peer-reviewed studies show that arsenic in the Athabasca River in the tar sands region of Canada interacts with PAH's to increase the cancer risk to fish by a factor of 10.

LaManna's assertion that PAHs are not toxic to fish is incorrect, especially when arsenic and PAHs are found together. Studies of the Ohio River, Chesapeake Bay and Puget Sound have linked PHA exposure to bile-duct cancer in fish.

The Sunnydell cleanup plan cannot be complete without an investigation into the presence and spread of arsenic.

#### **Children:**

The cleanup plan calls for limiting toxic exposure to children visiting the range by prohibiting them from "sitting or playing on the ground." This recommendation is too weak. Children should not be allowed into contaminated areas. The risk to young brains and bodies is too great, and children lack the maturity to understand the risks. Fencing should be erected to prevent neighborhood children from entering these areas. Protections should also extend to dogs, which will be actively working in highly contaminated areas, exposing themselves and their owners to lead and other toxins.

#### **Upper Pond:**

According to the *Site Characterization Report (LGI, 2011b)*, "high concentrations of lead and PAHs in the Upper Pond sediment do not warrant further investigation at this time because the Site is an active shooting range, and lead and PAHs can be expected to occur everywhere throughout the sediment column overlying the hardpan pond bottom."

No shooting of lead should be allowed into the upper pond because it is in hydraulic continuity with groundwater. Only steel or other non-toxic shot and non-toxic targets should be allowed to reach this pond. There is every reason to believe that lead has already migrated into shallow groundwater. The neighbor to the north has pasture land contaminated with lead, even at depths of 3 feet. While this lead contamination (180 ppm) falls just below the action level, that contamination is well above background levels and is likely to continue to rise. LaManna misses the point when it says that groundwater samples are below action levels. The point is that groundwater contamination is well above background levels and approaching action levels. To continue current practices will ensure that groundwater becomes contaminated in the future at levels that do require action. Unfortunately, there is no practical way to clean up the groundwater.

The range has been in operation for about 40 years, and typically it takes longer for lead and other toxins seeping off site to reach actionable levels. Sunnyside is in the early stages of contaminating a broad area of neighboring property and groundwater. The U.S. Environmental Protection Agency recently found a plume of lead leaching off an abandoned range in Salt Creek Park, slowly approaching action levels and about to reach the strait, where the EPA said it threatened shellfish beds. The Salt Creek range is roughly two decades older than the Sunnyside range. As toxins fan out and travel through shallow groundwater, the potential cleanup becomes progressively more difficult. Prevention should be the key strategy for blocking the spread of lead, PAHs and arsenic.

Recycling lead from the pond and other areas is a mitigating strategy, but not a solution. Only a fraction of the lead can be recovered. Many particles of lead are too fine to be recovered. Rainwater is acidic – typically 5.3 pH and falling as atmospheric CO<sub>2</sub> levels rise. At that level of acidity, the non-recoverable levels of lead contamination in soil will continue to rise. In many parts of the range, shot outfall drops into heavily treed areas of the range, making commercial lead recovery impossible. And the recycling activity itself further spreads fine particles. It is important to keep lead out of water and groundwater, and the range has reasonable alternatives – non-toxic shot and targets – to prevent this contamination.

The draft plan envisions poisoning the upper pond to kill any fish present. The theory is that killing off fish will block a pathway for lead to reach people and wildlife. This is a bad plan. Even if all the fish are killed, wildlife – such as ducks and geese – would be vulnerable to lead shot. Songbirds and other wildlife would be vulnerable to toxins reaching them through lower portions of the food chain. Frogs will quickly repopulate the area and become toxic food for herons. And the poison would have a direct pathway to groundwater.

A better approach is to remove toxins from the upper pond and prevent further contamination by requiring the use of non-toxic shot and targets. The US Fish & Wildlife Service has approved many economically viable alternatives to lead shot, such as bismuth, steel, tungsten/iron and tungsten/polymer shots.

### **Best Management Practices:**

The management plan for the range falls far short of the reasonable standards set forth in the EPA's *Best Management Practices for Lead at Outdoor Shooting Ranges*. Although these standards are voluntary, they were developed by the EPA in cooperation with all 50 states and major shooting groups. These BMP's should be adopted as minimal operating standards for Sunnyside because of the range's history of mismanaging hazardous waste in a populated area. The BMPs contain many strategies for managing a shooting range in a responsible manner, as well as providing contacts for experts and companies that offer environmental services for shooting ranges.

The link to the EPA's BMPs is:

[http://www2.epa.gov/sites/production/files/documents/epa\\_bmp.pdf](http://www2.epa.gov/sites/production/files/documents/epa_bmp.pdf)

Thank you for your efforts to protect the health of our community and for giving the public an opportunity to comment on your draft plan.

**From:** Larry Gorman  
**Sent:** Thursday, May 09, 2013 12:49 PM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunnydell Shooting Grounds

Dear Sir,

I have gone to Sunnydell frequently over the last 30 years and know the school well. It is one of the last and best training grounds for shotgun competition and well as hunter safety. I have been impressed with its emphasis on safety and the expertise of now deceased Chuck Dryke and Matt and Ellen Dryke. I would hope the lead and water run off problem can be resolved in such a way as to allow this unique training ground to remain open. There is no other resorse like this without going to California and therefore it is important to all of us in the NW who enjoy the sport of shotgun shooting and competition.

Thank you for your time in reading this,

Yours,

Larry Gorman M.D.

**From:** Mike Jew  
**Sent:** Saturday, May 11, 2013 8:58 AM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunnydell Cleanup

I encourage the approval of the cleanup plan. Sunnydell is an internationally and nationally known training facility, and its degradation would be a great loss to the shooting community worldwide. The owners and management are sincere and will do what is necessary to keep Sunnydell in operation. Thank you.

Mike Jew



**From:** Sextro, Bob  
**Sent:** Sunday, May 12, 2013 2:24 PM  
**To:** Barrett, Guy E. (ECY)  
**Cc:** Smith, Diana (ECY)  
**Subject:** Sunnydell CAP

Guy, the Sunnydell CAP indicated that a RAWP will be prepared for public review 60 days after the effective AO. Since there are no dates on the AO can it be assumed that the effective AO is around 3 June 2013 at the end of the public comment period or much later after the responsiveness summary??

Just wanted to get an idea when the RAWP would be available for review and comment, thanks,  
Bob Sextro

**From:** Vicki Tallman  
**Sent:** Monday, May 13, 2013 2:18 PM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** sunnydell shooting grounds

I personally know the owners and past owners of Sunnydell Shooting Grounds. No one has ever been sick from lead and they have and are living long lives. If this is really an issue, why is this the only site in Washington State to be required to go to this extent of a study?

I am in favor of the range, and without the facility, people would be shooting on random locations without any controls, which would be a safety issue and creating garbage pits.

Keep the range open! Thank you

Vicki Tallman

**From:** Gary Caswell  
**Sent:** Wednesday, May 15, 2013 10:04 AM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** sunnydell shooting grounds

Comments regarding Sunnydell Shooting Grounds:

I have been a Sequim resident for almost 40 yrs. I have over that time frame been a client/customer of Sunnydell and have been personal friends with the Dryke family. I also live right behind Sunnydell and have enjoyed having them as neighbors.

The majority of my disposable income has been spent @ Sunnydell Shooting Grounds and quite frankly cannot imagine life in Sequim without it.

Sunnydell is literally a first class shooting facility and has drawn shooters from around the world and is a great asset to our community.

So in short , leave them alone.  
Gary Caswell

**From:** Dale Luther Sr.  
**Sent:** Friday, May 17, 2013 1:14 PM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunnydell Shooting Grounds

Dear Mr. Barrett,

In response to the open comment period regarding the clean up of Sunnydell Shooting Grounds I urge you to continue to work with the Dryke family to keep the facility functioning. As a shooting participant there for 43 years I have found it to be a friendly and safe place to shoot all types of recreational firearms. Living and walking in an unincorporated area where people can and do randomly discharge shotguns and rifles can be disconcerting to say the least and would be increased significantly were the facility to be closed.

With the clean up of lead pellets, five year monitoring plus the use of nontoxic clay birds I am assuming the Department of Ecology and the Dryke family have a handle on the situation so as to keep the shooting grounds operational giving us a safe place to shoot. Your mutual cooperation has been significant in this endeavor and I urge both parties to continue in this regard.

Sincerely,

Dale Luther, Sr.  
3426 Crescent Beach Road  
Port Angeles, WA 98363  
360-928-3673

**From:** Tim Randle  
**Sent:** Friday, May 17, 2013 2:48 PM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunnydell

I am very glad to hear that the dark cloud hanging over Sunnydell has been cleared. Myself and some shooting pals from NM have been going to Washington and Sunnydell annually for a good number of years (it is a great resource).

Thank you for helping clear this up  
Tim Ehlenberger  
Santa Fe NM

**From:** Larry Dunbar  
**Sent:** Sunday, May 19, 2013 8:48 AM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunnydell Dryke Shooting Range

I am a patron of the shooting range and I am concerned about the cost of the selected alternative. What concerns me is the cost of that alternative, as well as the others, has not been identified. How could the DOE consider any alternative without knowing what the costs and benefits are? It seems that any action at this time may not be warranted since no contamination has reached the groundwater. Although the environment is a concern, having a safe place to shoot is also a concern. Closing down a shooting range could result in shooting of firearms in unauthorized areas. The actions of the DOE could result in excessive costs and putting a local business out of business!

**From:** janempdls  
**Sent:** Monday, May 20, 2013 3:36 PM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Comments on Sunnydell Shooting Grounds

Jane Burkey  
52 Grace Lane  
Sequim, WA 98382  
360-670-6030

Dear Mr. Barrett,  
May 20, 2013  
RE: Sunnydell Shooting Grounds: Facility ID#: 1283666

My name is Jane Burkey, and I live within 5 miles of Sunnydell Shooting Grounds. I have been going out there for years, and in fact, it is where I learned to shoot a shotgun. I've even competed in a few of the local shooting competitions held there (taking "Hi Lady" a couple of times).

I know that Sunnydell Shooting Grounds has a lot of historical value to Sequim, in that it was the FIRST PLACE in the US to introduce Sporting Clays, and of course, Chuck Dryke taught Matt (his son) how to shoot. Matt Dryke became the only US citizen to have won the Olympic GOLD MEDAL in Skeet, and he was inducted into the INTERNATIONAL SKEET HALL OF FAME. They (Chuck and Matt) also put on MANY demos, and competitions that were held at Sunnydell, bringing in a large influx of visitors due to those demos, and competitions. All of which helped Sequim out financially and introduced many people to this lovely area.

My own father (Dr. John N. Burkey) used to come out regularly to shoot, and hunt with Chuck. My father would also send his hunting dogs to Chuck Dryke to train. In fact, he's the one who recommended that I go out to Sunnydell Shooting Grounds and check it out.

I have met many high quality people there through the shooting sports, and the dog training and subsequent dog tests and trials I entered because of my experiences and contacts at Sunnydell Shooting Grounds.

I even learned how to train hunting dogs there from Chuck Dryke (from whom I also took the shooting lessons), and it has helped me out a lot in my training program.

For many years, I was out there on a daily basis, and took my dogs there too. I've brought friends and family out there whenever possible, and they too have enjoyed the wonderful atmosphere and friendliness of the Drykes (Chuck, Matt, Yvonne, and Ellen).

I know that there were (are?) concerns about the ground and water contaminates that have accrued over the 60+ years of Sunnydell Shooting Grounds' existence. No one I have ever brought there, nor myself have ever had ANY physical reactions of ANY TYPE from the exposure to the grounds whatsoever.

None of the dogs I've taken and run there have had any adverse reactions either. I've even brought dog clubs (Olympic Rainshadow Hunting Retriever Club, and the Puget Sound Dock Dogs) over on multiple occasions, and they have utilized both ponds, as well as pretty much all fields available, and none of the their dogs have had any problems from exposure to both the land and/or water.

I have personally trained my own dogs (and other's dogs) on the property for prolonged and daily training sessions in the fields and waters, all without incident or problem. In fact, I STILL take my dogs over there for training on the grounds and in the water, having no concerns for any exposure they might have there.

Over the 60+ years of Sunnydell Shooting Grounds' existence, there have been well over 100,000 people on the property, and I have met a great many of those during the years of my daily visits. I have NEVER heard ONE person say anything at all about having any worries about the lead or other contaminants on the property. Many of those people are "returnee's" - people who come all the way out to Sunnydell year after year (some for multiple decades) to enjoy the property, the shooting, and the welcome they receive.

Family's have scheduled their entire vacations around their trips out to Sunnydell Shooting Grounds. I've met many individuals, and families from foreign countries who have all made the trip to Sunnydell for shooting lessons. Some of the countries are: Germany, most of the European Nations, China, Japan, Canada, Mexico, Ireland, and many others.

Although I'm EXCEEDINGLY thankful that the State is working to keep Sunnydell Shooting Grounds open and available for the shooting public, I do think that the whole complaint, especially a "vendetta" complaint, and subsequent "investigation" of a private business was not warranted. I do hope that the State will continue to permit Sunnydell to welcome the public to the wonderful facility that it is.

It is a FINE establishment, where couples, friends, folks and families can go to enjoy clean, wholesome, bond-building fun!

Jane & Her Mini Poodles

\*Spunky Punkin's "**Shadow**" (10/15/82 - 8/17/97), UD, ASCA CDX, OAC, OJC, NG, AD, FFX-OG, TT, VC, CGC

\*UCDX, AGII, UWPCH/O/V/X/S, Raker's "**Jasmine**"('s) Doin' It All" (10/15/92 - 8/30/07), UD, ASCA CD, CKC CD, RE, EJC,NGC, AX, OAJ, FMX, FND, DWA, DD (MCOA), NDD (BMDCOA), HI, TDI, O-VCCX, FFX-OG/OG/AG, VC, VCX

\*UUD, AGII, UWPCH/O/V, Raker's Charming "**Jessie**" (11/18/93 - 4/19/10), UD, ASCA CDX, CKC CDX, RE, OJC, NGC, OAC, AX, AXJ, NAP, GAS-N, RAS-N, JAS-O, FMX, FND, DWA (UKC), DWA (AKC), DD (MCOA), NDD (BMDCOA), HI, TDI, VCC, FFX-OG/OG/AG/AP/OP, VC, VCX

\*URO3, UWPCH, UCH, HR, Kallista's BD's "**Star**" Duzit (10/18/10), RN, HI, CGC, WC, WCX, CDN-1, CDN-2, FDCH-S, VC, VCX

\*URO1, Kameo BD's "**Sparkly**" Duzit (10/6/11), FD

\*URO1, Kameo BD's "**Sprite**" Duzit (6/25/12) - In training...



**From:** Mary Pogue  
**Sent:** Wednesday, May 22, 2013 12:36 PM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunnydell Shooting Range

Attention: Guy Barrett

My name is, Mary Pogue, I am a resident of Sequim, Washington.

I have followed the building and creating of Sunnydell from the beginning. It is a beautiful facility, always very well maintained and regulated.

My son took shooting instructions there and was always coached on gun safety, respect for other participants, and surrounding property.

He is now an adult and it remains a high point in his life, the time he spent there as a juvenile and now as an adult.

I am acquainted with close residents of Sunnydell and there is no criticism of it. It has contributed to the attraction, prosperity and economy of the Sequim Valley.

Mary E. Pogue

5/23/13

Guy Barrett,

My husband and I have been going to Sunnydell shooting grounds for 40 years. If it hadn't been for Chuck Dryke's teaching neither my husband nor I would have had the success in shooting that we've had. Not only did he teach people like us but also world class + gold medal shooters.

The Dryke family has treated us like family, going out of their way to accommodate us.

To the best of our knowledge the Dryke family has done their best to comply to the demands of the Ecology Dept.

We hold our family reunion at Sunnydell every August + our kids + grandkids love the one on one lessons + fun shooting in our shooter's Disneyland. I hope this continues for many years.

Sincerely,

Winn & James M Nelson  
3923 no 15<sup>th</sup> St

Jacoma WA 98406

PH# 253 759 0153

E-mail: mbarrels1@gmail.com

**From:** LoBo Designs  
**Sent:** Thursday, May 23, 2013 12:39 PM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Comment: Sunnydell Shooting Grounds

23 May 2013

Dear Mr. Barrett,

For the past thirteen years, I've lived and worked in the Solmar/Carlsborg area of Sequim. My home is located on the same block as Sunnydell Shooting Range and Kennels, owned by the Dryke Family. My late husband and I were aware of the shooting range in our neighborhood prior to purchasing our home. Over the years, we have hiked the trails nearby at Robin Hill Park, the Olympic Discovery Trail, and walked around most of the neighborhoods streets between Hwy 101 and Old Olympic Highway and have enjoyed our life in this area.

To date, we have never had a problem with the Sunnydell Shooting Grounds, the kennels, or the Dryke family. Neither my husband or I were members of the facility, so have no professional or personal ties. I still consider the folks at Sunnydell to be conscientious about the safety of their business and have admired Charles Dryke, both as a sportsman and a man of integrity.

In response to your invitation to comment, please consider the following:

- 1) Sunnydell has been in business for almost 50 years. The property has been owned by the same family for generations with little or no complaints from neighbors, environmental agencies or government officials.
- 2) Within 1/2 mile of Sunnydell, there are automotive, construction and manufacturing companies. Further southwest is a long-established metals recycling facility, visible from the highway. All are elevated so that any contaminants originating from these facilities would contribute to the ecology of the soil and water, yet none of these businesses are listed in the complaint filed with your office.
- 3) The Solmar Water District is most certainly affected by the surrounding environment, however our water source - Solmar Lake - and the holding tanks are located above and to the west of the Sunnydell facilities and the properties listed in the complaint. Natural aquifers below these properties continue to run north toward the Salish Sea and to my knowledge, there are no wells in the Solmar area that are used for our drinking water.
- 4) According to the EPA site and the Environmental Working Group site there have been no health-based violations on file for our water system after 112 tests conducted between 2004-2006. In fact, arsenic, copper, lead, nitrate and nitrites are listed as "naturally occurring," "agricultural" and "industrial" pollutants.

Reference:

<http://projects.nytimes.com/toxic-waters/contaminants/wa/clallam/wa5381315-solmar-water-company>

<http://www.ewg.org/tap-water/whatsinyourwater2/WA/solmar-water-company/5381315/>

5) According to the WA State Dept of Ecology website and reports in our local newspapers, the owners of Sunnydell have been and continue to work with your staff to monitor and clean up toxic pollutants at their facility.

Reference: <http://www.ecy.wa.gov/programs/wr/instream-flows/dungeness-rule.html>  
<https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=3572>  
<http://peninsuladailynews.com/article/20130508/NEWS/305089989/0/SEARCH>  
[http://www.sequimgazette.com/news/article.exm/2010-12-08\\_sunnydell\\_cleanup\\_process\\_continues](http://www.sequimgazette.com/news/article.exm/2010-12-08_sunnydell_cleanup_process_continues)

6) Consider the fact that only one complaint has been filed since 1967. It targets a single business (rather than all businesses in the area) and was filed by an adjoining property owner ... an elected Clallam County official who is currently under investigation for allegations that she is using her office for personal gain in connection with the county's new Dungeness water rules.

Reference: <http://peninsuladailynews.com/article/20130505/news/305059984/0/SEARCH>

While I appreciate the efforts of the ECY staff working to monitor and maintain the ecology of our community, it is clear the owners of Sunnydell will continue to be good neighbors and will comply with federal, state and local rules. Since the Dryke's homes and businesses were built long before most of us were residents of the area, these folks are "grandfathered in" and deserve the utmost respect both personally and professionally.

Regards,

Laurie Tanguay

LoBo Designs  
"The Art of Business" ®  
360-582-1919  
[www.Lo-Bo.com](http://www.Lo-Bo.com)

**From:** Bart Gallant  
**Sent:** Monday, May 27, 2013 11:02 AM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunnydell Dyke Shooting Range

Dear Mr. Barrett,

I am writing in support of Sunnydell, the Dryke family, Ecology and the resultant Agreed Order.

As you are no doubt aware, many decades of Sunnydell operations predate the current awareness of environmental toxicity associated with lead shot and clay targets. Knowing Chuck Dryke as I did for 20 years prior to his death I was well aware of his love for the land and the natural world. His Zen-like instruction in a variety of disciplines brought world wide attention and acknowledgement to Sequim. His role as a pillar of the community and advocate for Sequim is honored by the reasonable Agreed Order. I congratulate all parties on the effective and sustainable plan.

I have known Chuck's son Matt and daughter Ellen along with Matt's wife Yvonne for many years. That their livelihoods are inextricably tied to Sunnydell and the Agreed Order assure that there will be diligent adherence to the plan to mitigate the affects of the presence of lead and PAH's.

Again, I congratulate Ecology and the Drykes for this effective and sustainable plan.

Sincerely,

Bart Gallant  
[hfiq@televar.com](mailto:hfiq@televar.com)  
509-947-5222

**From:** Covert  
**Sent:** Monday, May 27, 2013 12:25 PM  
**To:** Smith, Diana (ECY)  
**Subject:** Sunnydell List

Diane Smith:

Please add me to the email list for Sunnydell Shooting Grounds

As a clay target shooter I am Interested in the review process and want to support keeping the range open and economically viable. It is one of two possible ranges that support shotgun target sports in the "high" population areas of Clallam Count. It is the only public non-membership range that offers supervised shooting in the county. The date on the clubhouse is from the early1950's.I want to see it continue to provide this unique public service and encourage shooting in areas that can be managed.

Richard Covert  
1301 S 3rd Ave. #18A  
Sequim, WA 98382

"Accept what is as it is and help it to be its best."  
-Shunryu Suzuki

[AndroidEveryday.com](http://AndroidEveryday.com)

**From:** Covert  
**Sent:** Monday, May 27, 2013 12:45 PM  
**To:** Smith, Diana (ECY)  
**Subject:** Clarification Please

Greetings:

I read thIs on <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=3572>

"In 2004, Clallam County Department of Health & Human Services sampled water and sediment from two ponds on the property after receiving a complaint about water coming onto a neighbor's property."

The above statement makes it sound like the lead found in the sediment of the pond is also in the water. My basic understanding is that lead sitting in sediment does not contaminate water except under rare circumstances. My understanding is based on reading numerous research papers that are in the mainstream of the literature on the subject. My belief is that lead more or less stays put. Lead paint and so forth are legitimate concerns.

I'd appreciate information on where the actual lead contamination was found. Scooped up samples of lead shot or in the water.

Thanks,

Richard Covert  
1301 S 3rd Ave #18A  
Sequim, WA 98382

**From:** Barker Ranch  
**Sent:** Monday, May 27, 2013 7:13 PM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunnydell Shooting Grounds Agreed Order Support Letter

Dear Mr. Barrett,

I am writing in support of the Sunnydell Shooting Grounds Agreed Order with the WA Department of Ecology and the Dryke family. I am happy that there has been an agreement to keep the grounds open to future operations after use of the property as a shooting club since the 1960's, but still achieve the necessary environmental cleanup. As a lifelong hunter and former competitive shooter, I strongly feel that it is important to have areas like Sunnydell open for safe public shooting. In the late 1990's, I was a member of the Purdue Trap and Skeet Team where we won numerous National and Big-Ten Championships in international skeet. While training with my coach at Purdue, I often watched videos and studied the teachings of Matt and Chuck Dryke. Matt was a truly world-class shooter for the United States and a member of the US Army Marksmanship Unit, and in fact, won the gold medal in international skeet at the 1984 Olympic games in Los Angeles.

Due to my education and professional experiences, I have an understanding of the complexities of the issues involved with the Sunnydell Agreed Order and corresponding environmental remediation. I have AS and BS degrees in Natural Resources and Environmental Science, and an MS degree in Wildlife Science. I have spent the last 13 years of my professional life dedicated to wildlife management and wetland restoration, and volunteer time with the Benton Conservation District, Washington Association of Conservation Districts, Benton County Weed Board, and Benton County Parks Board. As a member of the Benton County Parks Board, I help oversee a lease between Benton County and the Tri-Cities Shooting Association's Rattlesnake Mountain Shooting Range. Safe operation in an environmentally acceptable way is vital to the continuation of the shooting sports, and I support this action to help keep Sunnydell open into the future. Thank you for your time, and please let me know if I could help further.

Sincerely,

Michael Crowder  
85305 Snively Road  
West Richland, WA 99353

509-521-3663



**From:** Jaiden Grinnell  
**Sent:** Wednesday, May 29, 2013 9:43 PM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunnydell Shooting Grounds

Hello,

My name is Jaiden Grinnell. I'm an International Skeet shooter on the USA National Shotgun Team, National Record Holder and reigning National Champion and all of that is because of the Dryke Family and Sunnydell Shooting Grounds. My father kindled in me a love for shooting from the time a was 6 years old. It was when I was 12 that he made the offer of taking me to Sunnydell in exchange for good grades, little did he know, that kindled love would ignite a passion to last a lifetime. This June, I will celebrate my 10 year anniversary with the Drykes. My family, however, has shot trap, skeet and sporting clays there for 3 generations and I hope to God that I will be able to bring my children as well and theirs after that. There are many similar stories of families coming together with the Drykes. This place and the people who I've come to know and love through the common love of shooting will never leave my heart or memory. Sunnydell Shooting Grounds has given me the opportunity to strive toward my goal of the Olympic Games and the character and life skills that I've learned through shooting cannot be compared to any school sport or activity. It would absolutely break my heart to see Sunnydell fall; I owe my accomplishments and even the person I am to that range and it is my belief that they *must* continue on.

Thank you,

Jaiden Grinnell

*Darlene Jackson Marmol  
645 Clark Road  
Sequim, WA 98382  
556djm@gmail.com*

May 29, 2013

Dear Mr. Barrett,

I am writing on behalf of my friends at Sunnydell Shooting Grounds. I met the Dryke family in 2006 when I moved to Sequim. Chuck Dryke trained my puppy and subsequently became my shooting coach, friend and mentor. He taught a vision-training program for shooters that I have incorporated into my movement sessions for children with gross motor delays. Many of the concepts he studied and taught have proven beneficial in helping with visual tracking issues and assist in creating a successful learning environment.

Consequently, I was at Sunnydell frequently during the time that Chuck and his then partner, were being handed down the news that they were under attack. I attempted to help Chuck who was then in his 80's find ways to refute the accusations that his shooting grounds were leaking lead into the groundwater. I searched the Internet for him. I looked for other shooting ranges that had been under attack for similar things. I never found anything that indicated that anyone had become ill from groundwater in and around other shooting ranges. No one has become ill from the groundwater around Sunnydell, either. Trees to the north of Sunnydell look good and are thriving. Chuck had been very concerned about water diverted through Sunnydell from highway construction.

Chuck Dryke was the kind of man who believed in the power of a handshake. The legal paperwork given to him by the DOE was mumble jumble in his mind and he felt he had no recourse but to sign the agreed order given to him. He was intimidated by the authorities but trusted them and believed that they had the good of the community and his Sunnydell at heart. He did not want his Sunnydell to be the cause of grief, but the DOE did cause him grief. The stress of losing his property and business and livelihood activated an autoimmune disease called Myasthenia Gravis. He died because of this stress. I was with him when he was overwhelmed by the possibility that he would lose the property he had created. He stated, "I love her." And he had real tears in his eyes. That was the day he wrote a check for the last monies in his reserve account.

As I read in the newspapers about government officials being scrutinized for ~~embezzlement and abusing their positions, I wonder just how far someone would go~~ to gain access to a prime piece of property. I wonder how people can live with themselves knowing that planting lead on a neighbor's property or accusing them of having lead in their groundwater (which, by the way has been disproven), caused

*Darlene Jackson Marmol*

*645 Clark Road*

*Sequim, WA 98382*

*556djm@gmail.com*

the demise of a man who was simple by nature but who offered a peaceful journey to those he touched. Sunnydell has been in existence for a very long time and has abided by the rules of engagement and been a good neighbor. I stand to honor the efforts of a man who was a good friend, who was trying to earn an honest living.

Chuck was his family's coach. Matt and Ellen are left to patch together the good name and continue paying forward the techniques of shooting created by their dad. The bills continue to plague them as they fight the accusations and continually prove that their property is doing no harm. It must not be doing any harm. It is still alive and functions well as a shooting range, even though its' creator is gone.

I sincerely hope the community of Sequim recognizes and pays attention to the facts; the subtleties that are present in regards to this matter and stand behind one of the pioneer families. I hope that people weigh the accusations and look at the lack of scientific evidence that Sunnydell has leaked groundwater and extend a handshake to a family that has been affected by unfounded accusations.

Yours truly,

Darlene J Marmol

**From:** Nancy Robinson  
**Sent:** Thursday, May 30, 2013 11:12 AM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunnydell Shooting Grounds in Sequim, WA

Dear Mr. Barrett, I'm sending this message to let you know that my husband and I have been shooting trap, skeet and sporting clays at Sunnydell for over 25 years. There is no better shooting facility in our state for these sports. We are always welcome there and also enjoy our fellow shooters and excellent coaching from the Dryke family.

Sincerely, Robie and Nancy Robinson  
Nemah, Washington

**From:** Jack Scher  
**Sent:** Thursday, May 30, 2013 3:18 PM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Good clubs hard to find

Nice to know that Sunnydell shooting grounds, Sequim, Wa ( The home of world Champions ) will be around, we need more places like it. Sportsmen and to be correct women of all type need a place like this. My two cents worth. Thank you Jack Scher Buriem Wa 206 242 0166

**From:** Neal Christensen  
**Sent:** Thursday, May 30, 2013 7:33 PM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunnydell Property in Sequim

Mr. Barrett,

This is a letter in support of the Sunnydell property in Sequim. My wife about 8 years ago informed me she would like to learn how to shoot a shot gun, so she could go with me to watch the pointing puppy that we had just purchased. When I ask around the people that came up time and again were the people and club at Sunnydell. Not only was it an incredible experience in teaching my wife the proper way to shoot and handle a firearm safely. We learned that they also trained dogs, not only do they train dogs, in my experience of over 40 years of handling dogs I believe they are the best in the state. I am not exactly sure what your problem is with Sunnydell, however if they need me in any capacity to get involved through my friends, colleagues or social media I will. In our dealings with them I have found them to be incredible caring people.

Neal Christensen  
Managing Broker  
Keller Williams Realty Kirkland  
Cell phone: 206-909-4684  
Email: [want2sell4u@msn.com](mailto:want2sell4u@msn.com)  
find your next Home at: <http://neal.kirklandeastsidehomes.kwrealty.com>  
Just click on the website to customize your home search

May 31, 2013

Comments concerning the Sunnydell Shooting Range

I have reviewed the proposed cleanup requirements for the Sunnydell Shooting Range. I cannot comment specifically about the requirements potentially imposed. However as a user of the site, my Labrador retriever was carefully trained there and, to this day provides many wonderful hours of hunting with my six grandsons. This would not have been possible elsewhere due to travel and cost restraints.

Whatever the requirements may be, they need to be effective of course, but within a realistic time frame that considers the costs to the Owners so that their business can continue as it has for over 60 years. It is a well known and highly regarded training site for hunters and their dogs. A paramount goal of State agencies should be to work with local businesses to insure their continuation and that regulations developed are not draconian and unrealistic.

Thank your for considering this viewpoint.

Glenn Wiggins  
702 Caroline St.  
Port Angeles, WA 98362  
360-457-7700

**From:** Curtis Baxstrom  
**Sent:** Friday, May 31, 2013 5:01 PM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunnydell in Sequim

Sir

I am making a plea that the Sunnydell Shooting Grounds be allowed to remain open. I have used these facilities for the past 32 years. Having shot at ranges all over the state and in Arizona, the Sunnydell facility is second to none.

Sunnydell is open to the public and contributes to shooting disciplines and gun safety rather than indiscriminate use of firearms.

Sunnydell also contributes to the local economy as I see and meet shooters from Canada, California and other states.

An Olympic hopeful now trains at Sunnydell.

Again, please keep Sunnydell open!

Thank you for allowing my input!

Curtis Baxstrom  
407 Norman St  
Sequim, Wa



**From:** Bryan Caditz  
**Sent:** Friday, May 31, 2013 5:22 PM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunnydell

Dear Mr. Barrett

I am writing to express my support for Sunnydell. I have lived in Seattle my entire life and my wife's family has a place in Quilcene. For the last twenty five years I have been coming to Sunnydell. Chuck and Matt taught my son how to shoot responsibly. The friendliness of the Drykes sets Sunnydell apart and above all other shooting ranges. It would be a tragedy if action by DOE caused Sunnydell to close. On behalf of my family, I request that, the required remediation be as limited as possible within applicable regulations.

Thank you for your consideration.

Bryan D. Caditz  
**Hedeen & Caditz, PLLC**  
600 University Street, Suite 2100  
Seattle, WA 98101-4161  
(206) 903-9953  
(206) 903-9956 fax

**From:** Joe Maas  
**Sent:** Sunday, June 02, 2013 10:55 AM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunnydell

Guy,

I have gone out to Sunnydell for multiple years, brought friends there, had my dog trained there, and no one I know has ever had any ill effects from their association with Sunnydell. On the contrary, I was able to improve my shooting skills (practicing shooting safety - of course), learned additional dog handling techniques, and in general really enjoyed myself. The owners (the Drykes) are hard working people, and they are always gracious hosts.

My friends also have only positive things to say about Sunnydell. None of us were ever worried about the lead and target "toxins" on the property, because it is a shooting range, where there would obviously be lead and targets (whole and broken) on the property.

My dog (Tootsie - a German Wirehaired Pointer) was trained and kenneled there multiple times, where she ran all over the property, swam in the two ponds there, and drank the well water in her water bucket. The only effects of her time there was that she is a very reliable hunting dog now. Plus, I'm a better shot now, all of which goes to increase wildlife conservation.

I hope that you will do ALL you can to help Sunnydell continue as it has for the past 60 years. I do know the owners are doing all they can with the lead cleanup, and are doing everything to comply with the Agreed Order & Draft Cleanup Plan.

Thank you for your efforts,

Joseph M. Maas, CFA, AVA, CM&AA, CFP<sup>®</sup>, ChFC, CLU<sup>®</sup>, MSFS, CCIM, CWPP  
Synergetic Finance  
701 Fifth Avenue Suite 3520  
Seattle, Washington 98104  
ph: 206.386.5455  
fx: 206.386-5452  
[www.synergeticfinance.com](http://www.synergeticfinance.com)



**From:** Bill Dickerson  
**Sent:** Sunday, June 02, 2013 11:00 AM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunnydell Shooting Grounds

Dear Sir:

It has come to my attention that the state is attempting to close Sunnydell Shooting Grounds in Sequim, Wa.

My family has used this facility for more than 30 years, and both of my sons learned to shoot and safely handle a shot gun at this shooting range. This range has provided proper, safe instruction in the handling of firearms for generations, in addition to the boarding and training of hunting dogs.

There is no other similar facility in this state that I am aware of, so I hope you will reconsider the action the state is pursuing.

Best regards,

William Dickerson  
23126 East Main St  
Sammamish, Wa 98074

**From:** susierennels  
**Sent:** Sunday, June 02, 2013 11:16 AM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunnydell Shooting Range

Hello Guy Barrett,

We have enjoyed the facilities of Sunnydell Shooting Range for the last twenty years. We have trained our dogs at their excellent kennels and have utilized their various ranges for skeet and trap shooting. We have been treated with courtesy and respect by the proprietors of Sunnydell and it is one of our favorite places to spend a weekend afternoon. A perceived threat from lead toxicity seems to us ridiculous. The persecution of this excellent facility in the name of environmental rigor should cease.

Dr. Robert L. Brown and family

**From:** fransen5  
**Sent:** Sunday, June 02, 2013 10:26 PM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunnydell Shooting Grounds

Sir: It has come to my attention that Sunnydell Shooting Grounds in Sequim is under consideration for closure by state agencies. If you would, kindly respond with the date and location of any planned forum for public input on this proposal. I will make every effort to attend and justify my position that this closure would bring an end to a unique and valuable institution in the Washington outdoor community that has provided instruction in the safe handling of firearms to the public for decades. Every member of my immediate family.....my wife, our daughter, our son and myself.....have all attended the Sunnydell Shooting Grounds and have left better informed and better prepared to carry on as examples of safe, responsible firearm ownership in our state.

Regardless of where one stands on the broad issue of gun control, I believe we can all agree that so long as citizens are armed, we owe it to the public to provide every opportunity for firearm owners to learn and practice safe, responsible firearm handling. Sunnydell has a long tradition of providing just such an opportunity and service to the community. At this point in time, I believe it is more important than ever to provide the public with opportunities to learn and practice good firearm habits.

Thank you for your time, and we look forward to your response regarding the opportunity for public input.

Regards,

William W. Fransen  
6708 Westhill Court SW  
Olympia, WA

360-754-1322

To: [guy.barrett@ecy.wa.gov](mailto:guy.barrett@ecy.wa.gov)  
From: Tony and Betty Joslyn  
65375 Diamond Ridge Rd  
Homer Ak 99603

Re: Sunnydell Shooting Grounds  
292 Dryke Road  
Sequim, Was 98382

Dear Sir,

For more than 20 years our family has enjoyed this wonderful facility in Sequim. This is shooting sports at its best. Proper and safe shooting instructions for novices and champions as well as boarding and training dogs are practiced here. A great place to recreate for all ages and levels of training and instruction.

The experience has been priceless for our family and countless others . There is no place like Sunnydell that I know of . It is a jewel worth saving.

Best Regards,

Tony and Betty Joslyn

**From:** Kirke Lisi  
**Sent:** Monday, June 03, 2013 12:45 AM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunny Dell Shooting grounds

Mr. Barrett,

I have been both shooting at Sunnydell and dog training for over 20 years. I feel the range serves the community in several ways. It is a world class shot gun facility. It fills the need for a safe and enjoyable place for people to shoot. The coaches at Sunnydell teach gun safety and are excellent coaches for shooting skills.

I have put national titles on two of my dogs with assistance from training at Sunnydell. My dogs have swam in all the ponds there. My oldest dog now 16 years has used the training grounds at Sunnydell his entire life. His age is an indication that he has had no ill affects from the environment at Sunnydell.

Regards, Kirke Lisi

e-mail: [klisi@msn.com](mailto:klisi@msn.com)

phone: 206-387-1551

**From:** Kerschen, Craig  
**Sent:** Monday, June 03, 2013 10:11 AM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunnydell Dryke Shooting Range

To whom it may concern.

I have visited Sunnydell on several occasions ... both for shooting sport and for dog training. I do understand the concerns for lead shot, but I can say first hand that Sunnydell is a beautiful place that I am more than comfortable to visit with family, friends and my sporting dogs. These types of places that allow shooting and training are becoming more rare and must be allowed to operate and continue great family traditions. I know the ownership will cooperate to preserve a great facility.

Thank You  
Craig Kerschen

3220 sw 97<sup>th</sup> Ave  
Portland OR 97225



**From:** Lincoln Thompson  
**Sent:** Monday, June 03, 2013 1:32 PM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunny Dell

Guy,

I am writing to say that I had my dog boarded by Jane and Chuck at Sunny Dell a few years ago. They did a fantastic job training him and also training us. I am aware that Sunny Dell has been in existence for many decades prior to the lead shot laws. I was never concerned for my dogs health while he was there or my family's when we visited. Our dog never did get sick and he is very healthy.

We support Sunny Dell and hope that new regulations do not put undue financial stress on a business that has been in operation for generations.

Feel free to call me with any questions.

Thank you,

Lincoln Thompson  
Windermere, Seattle WA  
Real Estate Broker  
206-322-8377 o  
206-774-6055 f  
[www.lincoln.withwre.com](http://www.lincoln.withwre.com)



30 May 2013

G.Barrett, Mgr  
P.O. Box 47775  
Olympia, Wa.98504-47775

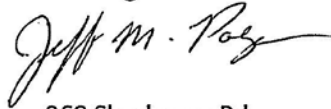
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JUN 03 2013  
WA State Department  
of Ecology (SWRO)

My name is Jeff Pogue. I believe in the Sunnydell Shooting Grounds. I believe that the Gun range and training grounds, are and have always been a positive place for young and old to learn the responsibilities related to guns, safety and gun etiquette I learned at a young age about guns. I took shooting lessons from Chuck Dryke in the Mid 70's..

Suunydel has been a part of Sequim's history and have helped support Sequim's youths, offering gun safety classes and training programs. Sunnydell is a positive place.

Jeff Pogue



960 Sherburne Rd.  
Sequim, Wa. 98382

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**From:** rossbr1  
**Sent:** Monday, June 03, 2013 3:37 PM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunnydell shooting grounds

Mr Barrett, I would like to express my concern to any restrictions placed on the Sunnydell range in Sequim. It is a icon in the local and the shooting community. Their standards for excellence and safety are among the highest that I have ever experienced.  
Please find this email as a wholehearted endorsement for the Sunnydell shooting facility in its present condition without further restrictions or limitations. Sincerely, Ross Brown

**From:** Mark Rubbert  
**Sent:** Monday, June 03, 2013 6:37 PM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunnydell

Greetings,

I am a lifelong shooter and competitor. For me, Sunnydell has been THE place to go for the highest quality instruction and practice, for the 35 years I have been visiting their facility. Even after all this time, shooting in many states, they have the best target presentations overall. I still make the trip up from Central Oregon whenever possible.

Safety is a top priority at this range.....as it is with every range. I have never felt threatened or unsafe at any time there. My dogs still run the property between shoots, swim, drink from the ponds and puddles, in general act like dogs, with no ill effects. I do not consider spent shot or targets to be hazardous in any way at their location, considering how the property is used.

The loss of this facility would be tragic. It is difficult to find the space and terrain required to set up a range like this anywhere reasonably close to populated areas. Moving them will not change anything environmentally, since EVERY range in existence has an abundance of broken targets and fallen shot. Here in Central Oregon there are very few opportunities to shoot on organized ranges. As a result, many rimrocks on Forest Service and BLM lands are used as shooting spots. Literally thousands of acres along picturesque river canyons are littered with broken clay birds, as well as all manor of riddled rifle targets. Having organized ranges available helps avoid these problems.

If you have any questions, please call.

Thank you,

Mark Rubbert  
Rimrock Management, Inc.  
915 sw Rimrock way  
ste 201-166  
Redmond, OR 97756  
(541) 408-7826

**From:** dschristoner@comcast.net  
**Sent:** Monday, June 03, 2013 6:56 PM  
**To:** Barrett, Guy E. (ECY)  
**Subject:** Sunnydell shooting grounds

Dear Mr. Barrett:

I am a good customer of Sunnydell for over 10 years. As a physician, I can appreciate potential risks associated with lead exposure for humans as well as dogs in training. Our Boykin Spaniel spent 6 weeks under the care of Sunnydell and Chuch Dryke for training and suffered no adverse consequences while there and after.

Sunnydell Shooting Grounds is a special place for many people and should continue to provide their excellent services to dog owners and of course those sharpening their shooting skills. Although there may be certain clean up measures to be done, keep this excellent facility running.

Sincerely

David M Christopher MD