

Appendix I: Comments

Comments submitted by Businesses and Organizations



Shaping the future for birds

October 6, 2008

Holly Davies
Dept of Ecology
P.O. Box 47600
Olympia, WA 98504-7600
Fax: (360) 407-6102
e-mail: hdav461@ecy.wa.gov

American Bird Conservancy comment on the Draft Lead Chemical Action Plan (CAP)

Thank you for the opportunity to comment on the Draft Lead Chemical Action Plan. The draft document is a remarkably complete presentation of sources, effects and regulations concerning lead in the environment. We commend the State of Washington in their efforts to undertake regulating toxics in such a transparent manner, by including the public and soliciting comments.

American Bird Conservancy is concerned with the effects of toxic contaminants on wildlife, especially birds, and lead is one of the most important contaminants needing additional regulations in the US. Lead fishing weights injure thousands of loons and other species annually, and other States are beginning to enforce changes in the materials to reduce lead in an effort to protect fish eating birds and waterfowl. We encourage Washington to quickly work to reduce fishing weight lead in the environment.

Lead shot and rifle bullet ammunition also contribute to the deaths of hundreds of thousands of birds annually. Lead shot continues to poison doves and other upland game birds, and lead fragments in offal and unrecovered carcasses of deer, pigs, elk, and other game species as well as "varmints" poison a large number of raptors, ravens and other scavenging birds. The draft report cites several reports from the wildlife literature, but there have been several excellent reports in the past year citing exposure of ravens and eagles in the Pacific Northwest, such as the Journal of Wildlife Management articles by Craighead and Bedrosian of research near Jackson WY. Several additional references will be published in a new symposium proceedings from the Peregrine Fund symposium on spent lead ammunition in the environment held in Boise ID in May 2008.

We agree with the analyses and conclusions in the Draft report, and laud the report for recommending action to reduce lead from the many sources cited in the report. We agree with Recommendation #9 in working to reduce the use of lead shot for all hunting, including upland game birds. We believe this recommendation should be stronger, and be made mandatory, by implementing hunting regulations and phasing out the sale of all lead shotgun ammunition in the State of Washington.

We are disappointed, however, with Recommendation #10, which does not recommend even encouraging hunters to switch to non-toxic rifle bullets to protect wildlife and hunters and their families who eat the game they shoot. The data cited in the draft report clearly indicate that this dietary source of lead will contribute to the toxic burden in humans, and it has been well documented that lead in offal and unrecovered carcasses poisons raptors and other scavengers. American Bird Conservancy believes stronger recommendations are in order to protect both humans and wildlife.

We thank the authors for their excellent report, and hope that their broad scope of recommendations are implemented quickly. The major sources of lead in the environment, including emissions listed in the Toxic Release Inventory, lost automobile wheel weights, and legacy sources such as lead paint should be eliminated, and this report provides excellent data to substantiate that effort. We agree that the major sources must be addressed, but we also believe that if the "minor" sources that expose and injure wildlife

1731 Connecticut Avenue, NW, 3rd Floor • Washington, D.C. 20009



Shaping the future for birds

and hunters are not seriously addressed, the result will be that the job will be only partially completed, and wildlife will ultimately suffer.

Thank you again for the opportunity to provide comments on this important report

A handwritten signature in black ink that reads "Michael Fry". The signature is written in a cursive, flowing style.

Michael Fry, PhD

Director of Conservation Advocacy

American Bird Conservancy

Washington DC

October 2, 2008

RECEIVED

OCT 07 2008

Holly Davies
Dept of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Ecology - SWFA - Ind

Dear Ms. Davies,

Audubon Washington is writing to support a strong Lead Chemical Action Plan. The Department of Ecology has done a good job in bringing together the science and facts regarding lead, its various uses and toxicity to life.

Two years ago we lobbied for and passed a new law requiring a \$1000 fine for using lead shot in off limit bird hunting areas. A substantial proportion of the global bird population— estimated to be around 16,000 birds in the late 1990's— spends the winter in the Puget Sound lowlands. Since 1999, at least 1,200 Trumpeter Swans have died of lead poisoning in Whatcom and Skagit Counties and Southern British Columbia. A single pellet can kill a full-grown swan in 30 days or less.

Phasing out, reducing exposure and removing lead as much as possible from our lives is important for human and wildlife health.

We support Recommendation #9 which relates to decreasing the use of lead in distributive products. Wheel weights, lead fishing sinkers and lead shotgun shot are released into the environment during the intended use. This creates a significant exposure to humans and wildlife which can be avoided. We also support the following goals under Ongoing Releases- Consumer Products:

Goal: prevent wildlife deaths from lead poisoning.

Goal: reduce adult lead exposure, so that all adult blood lead levels are less than 10 µg/dL.

Please keep moving forward to help get the lead out of our products and make our environment a safer place for people and wildlife.

Sincerely,

Nina Carter
Executive Director
Audubon Washington

cc: Dan Taylor, Policy Director Audubon California

Lead Fishing Tackle—Killer of Waterbirds

By Daniel Poleschook, Jr. and Ginger Gumm

Field Scientists, BioDiversity Research Institute

A. Our Work

1. We have worked on common loon and other waterbird conservation in Washington since 1996.
2. We have conducted projects, written reports and presented findings and recommendations to the National Forest Service, Washington Department of Fish and Wildlife, Loon Lake Loon Association, BioDiversity Research Institute and 23 Audubon Societies.
3. Arranged for Mark Pokras, Tufts University, one of the world's most prominent lead-toxicosis authorities, to present to Washington Department of Fish and Wildlife and Washington Department of Ecology.
4. Initiated the pamphlet "Get the Lead Out of Washington—Promote Responsible Fishing," which is supported and sponsored by the National Forest Service.
5. We have assisted with many common loon necropsies to determine cause of mortality.

B. Our Determinations About Lead Issues

1. Lead toxicosis from fishing tackle is responsible for 57% of common loon mortalities in Washington. This is likely similar for many other waterbirds. This is similar to the national average for all states that have common loons.
2. The number of common loons we know the mortalities to be from lead toxicosis is small compared to the actual total.
3. Common loons ingest lead by picking it up from the bottom, mistaking it for pebbles to aid digestion and from capturing fish with lead fishing tackle attached.
4. Lead toxicosis and loss of habitat are large contributors to the contraction of the common loon breeding range in Washington to be moving northward at 15 miles per year since 1976!
5. Only one piece of lead fishing tackle or lead shot will kill a waterbird. It will take 10-14 days and be a horrible death.

C. Other-Agency Determinations About Lead Issues

1. The U. S. Fish and Wildlife Service states that 1.6 to 2.4 million waterbirds die from lead toxicosis in the United States per year.

D. What Other States and Countries Have Done About Lead Issues

California banned lead shot in the California Condor Preserve.

Maine banned the use of lead in fishing tackle less than one ounce in weight in 1999.

Minnesota banned the use of lead fishing tackle weighing one ounce or less.

Massachusetts prohibits the use of lead fishing tackle in common loon primary habitat.

New Hampshire banned the use of lead fishing tackle weighing one ounce or less in 2000.

New York has banned the use of lead fishing tackle weighing one ounce or less in 2004.

Vermont banned the use of lead fishing tackle weighing one ounce or less in 2007.

Canada banned the use of lead fishing tackle in all its national parks and wildlife areas and is working on legislature for a country-wide ban.

Denmark banned the use of fishing tackle in 2002.

Great Britain banned the use of lead in fishing in 1987.

United States banned the use of lead sinkers in Yellowstone National Park and 13 wildlife refuges.

E. Our Recommendations

1. Ban the use of lead fishing tackle in all Washington waters.
2. Increase public education in Washington about lead toxicity to waterbirds and humans, and on responsible fishing practices.

We certify the above to be factual and true to the best of our knowledge.

Ginger Gumm, and

Daniel Poleschook, Jr., MS Geology

Field Scientist, BioDiversity Research Institute

www.briloon.org

Poleschook@msn.com

509-939-2748

40046 North Shore Lane

Loon Lake, WA 99148

From: HAMBONE49@aol.com
Sent: Saturday, September 27, 2008 8:14:51 AM
To: Davies, Holly (ECY)
CC: bohannon@sherrardlaw.com
Subject: lead ban

Holly Davies,

My name is Tom Hamilton. I am President at the Bremerton Trap and Skeet Club. We are a shotgun only sports club. The club has approximately 175 members, many of whom are retired and on fixed incomes. We are open three days a week and are for some their only regular outdoor recreation.

As I'm sure you know the cost of "non-lead" ammunition is at least twice that of the lead ammunition. and sometimes as much as 10 times as much. The cost to my members to shoot "non-lead" ammunition would be prohibitive, putting us and all clubs like us, out of business.

You may not be aware that lead mining and recycling at gun clubs has been going on for decades. It is a well established practice that is profitable to the clubs and has become more so with the recent commodity price increases. I urge you to research this practice.

The idea to ban lead from the sportsman may have an ulterior motive, but it would be very damaging to target shooter and hunters alike. I urge the department of ecology to take a common sense approach to this idea of banning lead.

I would be glad to testify on behalf of my fellow sportsmen anytime.

Regards, Tom Hamilton, President, Bremerton Trap and Skeet Club

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OCT 02 2008

Ecology - SWFA - Ind

September 29, 2008

Holly Davies
Department of Ecology
Industrial Section
P. O. Box 47706
Olympia, WA 98504-7706

Subject: Lead Chemical Action Plan

Dear Ms. Davies,

Attached are comments from the City of Everett regarding the Lead Chemical Action Plan. In summary, the City believes the current water quality regulatory program is sufficient and effective at addressing lead in the permitting of municipal wastewater discharges and the method for evaluating the need for water quality-based effluent limits is effective at determining if there is any reasonable potential to cause an exceedance of the applicable standard in the receiving water.

You may contact me by phone at 425-257-8231 or email at jwright@ci.everett.wa.us if you would like additional information or have questions about these comments.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jeff Wright", is written over the "Sincerely," text.

Jeff Wright
City of Everett



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City of Everett comments; public review of draft chemical action plan for lead.

pg 141, 1st paragraph under "Toxics in Puget Sound"

To prevent confusion, it would be best to not cite to the Ecology's phase I study prepared by Hart-Crowser¹ to represent the lead loadings from sewage treatment plants and industrial point sources. There are three reasons I say this:

1. The municipal and industrial calculations were incorrect because the two largest dischargers (both municipal discharges for King County DNR) were listed as industrial sources instead of municipal,²
2. The calculated loadings for numerous dischargers, including the two largest were based on non-detect observations, and a calculation that treated non-detects as equal to half the detection level,²
3. Ecology is aware of the shortcomings of the Phase I loading values for point sources and will soon release a Phase II loading study that is much better³, and is for most parameters fairly close to the loadings calculated by People for Puget Sound. [Based on a preview draft of the Phase II loading study, the Municipal point source loading is 1.0 metric ton per year and the industrial loading is 0.5 metric ton per year.]

pg 141, 2nd paragraph under "Toxics in Puget Sound"

This refers to loadings calculated by People for Puget Sound in a draft study in 2007. Their report is now final in 2008 and the values from that report should be

¹ Hart Crowser, 2007. Phase 1: Initial Estimate of Toxic Chemical Loadings to Puget Sound.

² See, Table D-1 in Hart Crowser 2007.

³ Contact Jim Maroncelli at (360) 407-6588



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used instead. For Lead, the changes were small, with Municipal point sources at 3.3 metric tons per year and Industrial at 0.3 metric tons per year. Because People for Puget Sound used maximum values for some facilities when average values were not available, the loadings calculated are biased high. With that caveat, the city believes the calculations by People for Puget Sound are a reasonable approximation. Average concentrations were available for the City of Everett wastewater discharges and were used appropriately.

pg 142, 1st paragraph under “Sewage treatment”

This paragraph also refers to the estimated loadings from municipal treatment plants based on the faulty Phase I report by Hart Crowser and the 2007 draft report by People for Puget Sound (PFPS). Please revise the paragraph to use the Phase II toxics loading report from Ecology (due out soon) and the 2008 final report by People for Puget Sound. There still are differences between how the Phase II report calculated loadings and how People for Puget Sound calculated them, but using the Phase II and PFPS 2008 reports greatly narrows the range in which the true total municipal and industrial loadings will be found. For municipal loadings, that range will be 1.0 to 3.3 metric tons per year, and for industrial the range will be 0.3 to 0.5 metric tons per year.

It is important to put loadings calculations into context. The loadings occur in a very large volume of treated effluent. The PFPS report calculated an annual total volume of treated effluent of 182.9 billion gallons, while the Phase II report calculated an annual total volume of 166.7 billion gallons. The loadings are based on measurements of total lead in effluents. Marine and fresh water quality standards for lead are based on dissolved lead. Based on the 2008 final report by People for Puget Sound, the total loadings (3.3 metric tons/yr municipal; 0.3 metric tons/yr industrial) divided by the total volume of effluent (141,150 million gallons municipal; 41,760 million gallons industrial) results in an average concentration (6.2 ug/l total lead for municipal and 2.0 ug/l total lead for industrial) that is less than the marine chronic water quality standard of 8.1 ug/l dissolved.



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pg 143, Figure IV-3.

The figure needs a better title. The following title is suggested...

“Trend in Annual Average Lead Concentrations in Biosolids from the West Point Treatment Plant, 1988-2006.”

pg 161, paragraph describing water quality standards for surface waters.

The paragraph incorrectly says that there are no freshwater numeric criteria for lead in WAC 173-201A-240. Table 240(3) in the regulation clearly has numeric criteria for freshwater for lead. I encourage the author(s) of the draft cleanup action plan for lead to spend more time becoming familiar with this table.

The table has footnotes “q”, “c”, “r”, and “d” in the columns for acute and chronic freshwater criteria. The water quality criteria for lead are not single fixed values, but instead are dependent on the hardness of the water. The footnotes “q” and “r” provide the formulas for calculating the criteria. The criteria formulas provide a calculation for total lead. Metals criteria however are based on dissolved metals, not total. Additional formulae provide the hardness dependent conversion factors to convert the total lead values to the dissolved lead criteria. The lead criteria are further qualified by footnote “dd” which allows that the dissolved metals criteria may also be used to calculate total recoverable effluent limits based on knowledge of the seasonal partitioning of the dissolved to total recoverable values, or by back-calculation using the conversion factors incorporated in the criterion equations.

The metals criteria are not easy to use, but there are lead criteria for freshwater and they are commonly referred to and evaluated by Ecology permit writers in municipal and industrial wastewater discharge permit decisions.

pg 206, paragraph labeled “Eliminate mixing zones.”

This section does not need to be included. As demonstrated above, the loadings calculations to surface waters show that the average concentration represented by the loadings is actually lower than the chronic marine lead criterion. The total release of lead via NPDES permitted dischargers is simply not a water quality concern. Very few permits have actual numeric limits for lead because the method



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for evaluating the need for water quality-based effluent limits is effective at determining if there is any reasonable potential to cause an exceedance of the applicable standard in the receiving water, and where there is no reasonable potential to exceed, no limit is needed. While the determination does consider the effect of dilution, the reasonable potential to exceed determination does demonstrate for many dischargers that the effluent does not even exceed the water quality standard, even without a dilution benefit. The reasonable potential to exceed evaluation happens every time an individual permit is renewed.

Attached are the reasonable potential to exceed determinations for lead and other metals from the permit fact sheets for the Cities of Tacoma, Bellingham, Bremerton, Marysville, and two treatment plants for Everett. The analytical process used by the Department of Ecology was developed by EPA and is found in both the state's *Permit Writers' Manual* and EPA's *Technical Support Document for Water Quality-based Toxics Control* (EPA/505/2-90-001).

Ecology has submitted its 303(d) list of impaired waters to EPA for review and approval. No marine waters in the Puget Sound Action Area are identified as impaired (Category 5) for lead. Marine sediments are listed as impaired (Category 5) for lead in the Duwamish Waterway only. The 303(d) list does identify a number of cleanup actions (Category 4A or 4B) in urban embayments for lead in sediments, which are generally based on historical releases, and not existing discharges. Only two freshwater sites are listed as impaired (Category 5) for lead in the water, and none are listed for lead in sediment.

Both the toxics loading data for lead from point sources, the reasonable potential to exceed process used by Ecology in evaluating Permittees, and the 303(d) list of impaired waters support the fact that lead from permitted point sources is not a significant water quality problem in our state. There is no need for the cleanup action plan to push for reducing or eliminating mixing zones for lead.

9/29/08 8:34 AM

FACT SHEET FOR NPDES PERMIT WA0037087
CITY OF TACOMA
CENTRAL WASTEWATER TREATMENT PLANT #1

Determining the Requirement for Permit Limits Through a Reasonable Potential Determination to Violate Standards at the Edge of the Mixing Zone.
Based on EPA/505/2-90-001

Notes: Tacoma #1 Metals Workbook

INPUT											
	Arsenic	Cadmium	Cr Hex	Cr Tri	Copper	Lead	Mercury	Nickel	Selenium	Silver	Zinc
Confidence Level and Probability Basis:	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Coefficient of Variation for the Effluent Concentration (CV) (0.6 or a calculated CV if there are more than 10 data points):	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.6
Number of Effluent Samples or Data Points (ND):	34	34	20	34	534	34	14	34	34	34	34
Highest Dissolved Effluent Concentration or Value (HV):	21.497	0.0764	6.059	2.1829	77.19	3.071	0.2241	4.0089	1.3944	2.968	54.385
Dilution Factors (1/(Effluent Volume Fraction)) or plumes model											
Acute Receiving Water Dilution Factor:	25	25	25	25	25	25	25	25	25	25	25
Chronic Receiving Water Dilution Factor:	148	148	148	148	148	148	148	148	148	148	148
Water Quality Standards (Concentration)											
Acute (one-hour) Dissolved Criteria:	69	42	1,100	---	4.8	210	1.8	74	290	1.9	90
Chronic (n-day) Dissolved Criteria:	36	9.3	50	---	3.1	8.1	0.025	8.2	71	---	81
Upstream Receiving Water Concentration:											
Upstream Dissolved Concentration for Acute Condition (7Q10):	0.981	0.0613	0.15	0.15	1.003	0.0202	0.0005	0.4395	0.0871	0	3.65
Upstream Dissolved Concentration for Chronic Condition (7Q10):	0.981	0.0613	0.15	0.15	1.003	0.0202	0.0005	0.4395	0.0871	0	3.65
OUTPUT											
Percentile Represented by the Highest Concentration in Data Set ($p_n = (1 - \text{confidence level}) \times 1/\text{ND}$)	0.916	0.916	0.861	0.916	0.994	0.916	0.807	0.916	0.916	0.916	0.916
Normal Distribution Value for 95th Percentile	1.645	1.645	1.645	1.645	1.645	1.645	1.645	1.645	1.645	1.645	1.645
Normal Distribution Value for XXth Percentile	1.376	1.376	1.084	1.376	2.537	1.376	0.868	1.376	1.376	1.376	1.376
$s^2 = \ln(\text{CV}^2 + 1)$	0.307	0.307	0.307	0.307	0.307	0.307	0.307	0.307	0.307	0.307	0.307
$\text{C95} = \exp(1.645\text{Sigma} - 0.5\text{Sigma}^2)$	2.135	2.135	2.135	2.135	2.135	2.135	2.135	2.135	2.135	2.135	2.135
$\text{CXX} = \exp(\text{XX Sigma} - 0.5\text{Sigma}^2)$	1.840	1.840	1.564	1.840	3.501	1.840	1.388	1.840	1.840	1.840	1.840
Reasonable Potential Multiplier = $\text{C95}/\text{CXX}$	1.2	1.2	1.4	1.2	0.6	1.2	1.5	1.2	1.2	1.2	1.2
Maximum Expected Concentration of Pollutant in Effluent (MEC):	24.95	0.089	8.268	2.533	47.07	3.564	0.345	4.652	1.6182	3.467	63.09
Acute - Concentration of Pollutant at the Edge of the Mixing Zone (CP):	1.940	0.062	0.475	0.245	2.846	0.162	0.014	0.808	0.1483	0.139	6.03
Chronic - Concentration of Pollutant at the Edge of the Mixing Zone (CP):	1.143	0.061	0.205	0.166	1.314	0.044	0.003	0.468	0.0974	0.023	4.05
Reasonable Potential to Violate Acute Criteria at the Edge of the Mixing Zone (RP):	NO RP	NO RP	NO RP	---	NO RP	NO RP	NO RP	NO RP	NO RP	NO RP	NO RP
Reasonable Potential to Violate Chronic Criteria at the Edge of the Mixing Zone (RP):	NO RP	NO RP	NO RP	---	NO RP	NO RP	NO RP	NO RP	NO RP	---	NO RP

4/27/2004

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FACILITY NAME: City of Everett, Water Pollution Control Facility

NPDES Permit #WA-002449-0

REASONABLE POTENTIAL CALCULATION

4/15/2004 1:55 PM
Everett tsdcalc11.xls
REASPT.XLS

This spreadsheet calculates the reasonable potential to exceed state water quality standards for a small number of samples. The procedure and calculations are done per the procedure in Technical Support Document for Water Quality-based Toxics Control (U.S. EPA, March, 1991 (EPA-552/2-90-001)) on page 56. User input columns are shown with red headings. Corrected formulas in col G and H on 598 (88)

Parameter	Metal Criteria Translator as decimal		Metal Criteria Translator as decimal	Ambient Concentration (mg/L as dissolved)	State Water Quality Standard		Max concentration at edge of...		Effluent percentile value	Pn	Max effluent conc. measured (mg/L as total recoverable)	Coeff Variation	# of samples	Multiplier	Acute Df'n Factor	Chronic Df'n Factor	COMMENTS
	Acute	Chronic			Acute ug/L	Chronic ug/L	Acute Mixing Zone ug/L	Chronic Mixing Zone ug/L									
Ammonia (Total)					9700.0	2120.0	3011.21	1406.60		0.95	0.95	0.31	0.30	0.85	6.4	14.2	Lagoon System
Cadmium	0.99		0.99	90.0000	42.0	9.3	0.03	0.01	0.95	0.981	0.93	3.20	1.56	0.51	6.4	14.2	Lagoon System
Chlorine					13.0	7.5	14.82	6.68	0.95	0.997	550.00	3.05	1.53	0.17	6.4	14.2	Lagoon System
Copper	0.83		0.83	0.6390	4.8	3.1	1.93	1.22	0.95	0.981	12.09	0.28	0.27	0.89	6.4	14.2	Lagoon System
Lead	0.95		0.95	0.0238	210.0	8.1	0.64	0.30	0.95	0.981	5.15	0.53	0.50	0.81	6.4	14.2	Lagoon System
Mercury	0.85		0.85		1.8	0.0	0.01	0.00	0.95	0.981	0.11	12.50	2.25	0.38	6.4	14.2	Lagoon System
Silver					1.9	10000.0	0.13	0.07	0.95	0.981	1.19	0.50	0.47	0.82	6.4	14.2	Lagoon System
Zinc	0.95		0.95		90.0	81.0	7.37	3.92	0.95	0.981	58.47	0.98	0.37	0.85	6.4	14.2	Lagoon System
Ammonia (Total)					9700.0	2120.0	2737.86	1353.36		0.95	0.979	0.33	0.32	0.88	7.3	15.3	TF/SC System
Cadmium	0.99		0.99	90.0000	42.0	9.3	0.01	0.01	0.95	0.981	0.20	8.80	2.09	0.41	7.3	15.3	TF/SC System
Chlorine					13.0	7.5	4.45	2.12	0.95	0.997	124.00	1.71	1.17	0.26	7.3	15.3	TF/SC System
Copper	0.83		0.83	0.6390	4.8	3.1	1.84	1.21	0.95	0.981	12.30	0.19	0.19	0.92	7.3	15.3	TF/SC System
Lead	0.95		0.95	0.0238	210.0	8.1	0.39	0.20	0.95	0.981	3.45	0.46	0.44	0.83	7.3	15.3	TF/SC System
Silver					1.9	10000.0	0.08	0.05	0.95	0.981	0.93	0.65	0.59	0.77	7.3	15.3	TF/SC System
Zinc	0.95		0.95		90.0	81.0	5.26	2.51	0.95	0.981	44.60	0.22	0.22	0.91	7.3	15.3	TF/SC System

REASONABLE POTENTIAL CALCULATION TO DETERMINE EXCEEDANCE OF WATER QUALITY-BASED CRITERIA

This spreadsheet calculates the reasonable potential to exceed state water quality standards for a small number of samples. The procedure and calculations are done per the procedure in Technical Support Document for Water Quality-based Toxics Control, U.S. EPA, March, 1991 (EPA/505/2-90-001) on page 56. User input columns are shown with red headings. Corrected formulas in col G and H on 5/95 (GB)

Parameter	Metal Criteria Translator as decimal	Metal Criteria Translator as decimal	Ambient Concentration (measured as dissolved)	State Water Quality Standard		LIMIT REQ'D?	Effluent percentile value	Pn	Max effluent conc. measured (measured as total recoverable)	Coeff Variation	s	# of samples n	Multiplier	Acute Dfln Factor	Chronic Dfln Factor	COMMENTS
				Acute ug/L	Chronic ug/L											
Ammonia - N				2830.00	420.00	NO	0.95	0.993	47000.00	0.47	0.45	443	0.69	20	120	
Chlorine				13.00	7.50	YES	0.95	0.973	350.00	0.57	0.53	109	0.86	20	120	
Cyanide				1.00	1.00	NO	0.95	0.951	13.00	0.35	0.34	60	1.00	20	120	Most samples below MDL Maximum Effluent Concentration Measured = 13 ug/l
Arsenic				69.00	36.00	NO	0.95	0.951	3.30	0.42	0.40	60	0.99	20	120	
Cadmium				42.00	9.30	NO	0.95	0.951	0.80	0.62	0.57	60	0.99	20	120	All but one sample below MDL Maximum Effluent Concentration Measured = 0.9 ug/l
Chromium (Hex)				1100.00	50.00	NO	0.95	0.951	78.00	2.43	1.39	60	0.98	20	120	Most samples below MDL Maximum Effluent Concentration Measured = 78 ug/l WQ Standards are for Hexavalent Chromium, but the Effluent sample results are for total Chromium
Copper				4.80	3.10	NO	0.95	0.951	27.10	0.87	0.75	60	0.99	20	120	
Lead				210.00	8.10	NO	0.95	0.951	20.00	1.05	0.86	60	0.99	20	120	All but four sample below MDL Maximum Effluent Concentration Measured = 20 ug/l
Mercury				1.80	0.025	NO	0.95	0.951	0.28	1.60	1.13	60	0.99	20	120	All but two samples below MDL Maximum Effluent Concentration Measured = 0.28 ug/l
Nickel				74.00	8.20	NO	0.95	0.951	16.00	0.68	0.62	60	0.99	20	120	Most samples below MDL Maximum Effluent Concentration Measured = 16 ug/l
Zinc				90.00	81.00	NO	0.95	0.951	190.00	1.15	0.92	60	0.99	20	120	

Bellingham respirot 2005.xls

REASONABLE POTENTIAL CALCULATION

NPDES Permit No.

This spreadsheet calculates the reasonable potential to exceed state water quality standards for a given number of samples. The procedure and calculations are done per the procedure in Technical Support Document for Water Quality-based Toxics Criteria, 1997 (EPA/600/3-96-001) on page 56. User input columns are shown with red headings. Correlated formulae in col G and H on 568 (GB).

CALCULATIONS																			
Parameter	Metal Criteria Transfer as decimal	Metal Criteria Transfer as decimal	Metal Criteria Transfer as decimal	Ambient Concentrat ion (metals as dissolved) ug/L	Acute ug/L	Chronic ug/L	State Water Quality Standard	Max concentration at edge of...	Chronic Mixing Zone ug/L	Chronic Mixing Zone ug/L	Effluent percentile value	P ₇	Max effluent conc. measured (metals as total recoverable) ug/L	Coeff Variation CV	# of samples n	Multiplier	Acute Dil'n Factor	Chronic Dil'n Factor	COMMENTS
arsenic	0.95	0.95	0.95	11.55000	5.84000	3.15	1.96	NO	NO	0.95	0.95	0.950	60.00	0.60	0.55	1	6.20	112	180
chromium (hexavalent)	1.00	1.00	1.00	40.20000	17.85000	33.33	3.21	NO	NO	0.95	0.95	0.950	60.00	0.60	0.55	1	6.20	11	110
copper	0.99	0.99	0.99	89.00000	35.00000	0.62	0.29	NO	NO	0.95	0.95	0.987	16.00	0.60	0.55	25	1.27	33	70
lead	0.83	0.83	0.83	1100.00000	90.00000	0.57	0.27	NO	NO	0.95	0.95	0.987	15.00	0.60	0.55	25	1.27	33	70
nickel	0.95	0.95	0.95	4.80000	3.10000	3.14	1.48	NO	NO	0.95	0.95	0.987	98.00	0.60	0.55	25	1.27	33	70
zinc	0.99	0.99	0.99	210.00000	18.10000	0.18	0.09	NO	NO	0.95	0.95	0.987	5.00	0.60	0.55	25	1.27	33	70
	0.95	0.95	0.95	74.00000	8.20000	0.19	0.09	NO	NO	0.95	0.95	0.987	5.00	0.60	0.55	25	1.27	33	70
	0.95	0.95	0.95	90.00000	81.00000	10.06	4.74	NO	NO	0.95	0.95	0.987	276.00	0.60	0.55	25	1.27	33	70
ACRYLONITRILE	1.00	1.00	1.00			1.35	0.64	YES	YES	0.95	0.95	0.473	17.20	0.60	0.55	4	2.59	33	70
BENZENE	1.00	1.00	1.00			0.08	0.04	YES	YES	0.95	0.95	0.473	1.00	0.60	0.55	4	2.59	33	70
CHLOROFORM	1.00	1.00	1.00			0.38	0.18	YES	YES	0.95	0.95	0.473	4.80	0.60	0.55	4	2.59	33	70
DICHLOROBROMOMETHANE	1.00	1.00	1.00			0.08	0.04	YES	YES	0.95	0.95	0.473	1.00	0.60	0.55	4	2.59	33	70
METHYL CHLORIDE	1.00	1.00	1.00			0.20	0.09	YES	YES	0.95	0.95	0.473	2.50	0.60	0.55	4.00	2.59	33.00	70.00
METHYLENE CHLORIDE	1.00	1.00	1.00			0.09	0.04	YES	YES	0.95	0.95	0.473	1.20	0.60	0.55	4.00	2.59	33.00	70.00
TOLUENE	1.00	1.00	1.00			0.31	0.14	YES	YES	0.95	0.95	0.473	3.90	0.60	0.55	4.00	2.59	33.00	70.00
PHENOL	1.00	1.00	1.00			0.30	0.14	YES	YES	0.95	0.95	0.473	3.80	0.60	0.55	4	2.59	33	70
IS (2-ETHYLHEXYL)PHTHALATE	1.00	1.00	1.00			2.26	1.07	YES	YES	0.95	0.95	0.473	28.90	0.60	0.55	4.00	2.59	33.00	70.00
DI-N-BUTYL PHTHALATE	1.00	1.00	1.00			0.08	0.04	YES	YES	0.95	0.95	0.473	1.00	0.60	0.55	4.00	2.59	33.00	70.00



COMMUNITY DEVELOPMENT
808 W. SPOKANE FALLS BLVD.
SPOKANE, WASHINGTON 99201-3339
(509) 625-6325
FAX (509) 625-6315

October 6, 2008

Holly Davies, Ph.D.
Lead Chemical Action Plan Technical Committee
Washington State Department of Ecology

RE: Comments on Draft Washington State Lead Chemical Action Plan

Dear Dr. Davies:

Thanks to you and the Lead Chemical Action Plan Technical Committee for your extensive work toward protecting Washington residents from lead hazards. This finalized report will prove a valuable resource in assessing and addressing lead-based paint hazards.

Since October 2004, the City of Spokane has administered the Lead Safe Spokane program funded through the HUD Office of Healthy Homes and Lead Hazard Control. This grant expired in September 2008. During that time, Lead Safe Spokane performed XRF lead inspections on over 500 pre-1978 housing units and remediated identified lead-based paint hazards in over 200 owner and renter-occupied units. We recently applied for a 36-month HUD lead hazard control grant to continue our lead-based paint activities.

Please consider the following comments to your draft report based on my experiences as Project Director of the Lead Safe Spokane program.

Support for lowering Elevated Blood Lead (EBL) threshold.

Current studies support the statement that there is no safe level of lead in blood. The current 10 ug/dl level responds only to threat of immediate harm. Lead Safe Spokane prioritized lead hazard control activities in housing units occupied by children having ≥ 5 ug/dl of blood lead. Responding to lower levels of blood lead wisely seeks to prevent of increasing blood lead levels as well as ongoing low-level exposure. I hope that laboratory analysis can accurately identify 2 ug/dl of blood lead.

Support for expanded child blood testing.

I believe that the extent of blood lead poisoning in Washington State is not truly known. The testing rate of Washington children under 6 years of age is abysmally low. Studies and statements published by the Department of Health discourage doctors from performing relatively inexpensive blood lead tests. June 2007 letters from the DSHS Division of Health Care Services to Spokane's Center for Justice reiterate the DSHS position that few reported cases of blood poisoning justifies defiance of required blood lead testing for all Medicaid and Head Start kids.

Last year, just over 400 kids were lead tested in Spokane County. Periodic finger-prick blood testing offered by The Lands Council at City of Spokane community centers have increased the number of kids tested by over 50% and identified multiple ≥ 5 ug/dl kids and one 11 ug/dl child. All cases were previously undiagnosed. I encourage you to contact Kat Hall of the Lands Council at (509)209-2403 and visit their blood testing webpage www.landscouncil.org/water/reducing_lead.asp.

If untargeted blood testing identifies unreported cases of elevated blood lead then focused statewide testing should cast a needed and informative light on the actual incidence of lead poisoning across the state. Compliance with Medicaid and Head Start blood testing requirements would be a great first step followed by your recommended targeted testing.

Concern with requiring remediation of EBL child occupied rental units.

While it is important to address the source of lead poisoning, requiring repair or abatement in EBL child occupied rental housing is problematic. There is great difficulty in definitively identifying the source of lead that caused blood poisoning. Adequate trained staff must be provided by a state agency to equitably apply and enforce this requirement in both rural and urban areas. Requiring repairs without funding may force closure of older units that provide needed, although less desirable, affordable housing.

Rental unit owners and associations are likely to oppose overall lead testing and repair efforts if they feel targeted for required leaded paint repairs. Landlords may become reluctant to rent units to family households. This violates Fair Housing laws but effectively makes family-sized rental housing harder to find.

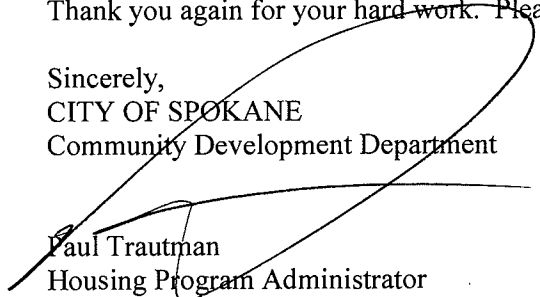
Support lead inspections for pre-1960 home sales.

Increasing homebuyer awareness of potential lead-based paint hazards can pay substantial dividends in future repair and renovation activities. Current federal law provides the opportunity for homebuyers to perform a risk assessment as a condition of sale. Increasing that provision to a required surface-by-surface lead inspection will provide critical information on a home that replicates itself through property disclosures for each subsequent sale. This requirement would likely cause sellers to perform such testing in advance and address defective lead-based paint surfaces prior to listing a home for sale.

Although the cost of such a requirement will likely decline over time, widespread availability and consistent pricing remain barriers to all Washington residents complying with such a requirement.

Thank you again for your hard work. Please feel free to contact me with any questions.

Sincerely,
CITY OF SPOKANE
Community Development Department



Paul Trautman
Housing Program Administrator

From: Bob and Alice Kadow

Sent: Sunday, October 05, 2008 1:35:04 AM

To: Davies, Holly (ECY)

Subject:

Ms Davies.

My name is Bob Kadow and I am President of Clark Rifles Inc. We have 700 members in our club.

I notice that on your committee there is no one representing the shooters of the State Of Washington. I think we should be represented on the committee.

How would we go about getting a representative?

Robert A. Kadow
President
Clark Rifles Inc.

From: [Cant, Stephen M. \(LNI\)](#)
To: [Davies, Holly \(ECY\):](#)
cc: [Silverstein, Barbara \(LNI\); Whitaker, Carolyn \(LNI\); Kenney, Janet E. \(LNI\); Zeller, Bruce E \(LNI\); Furman, John \(LNI\); Christian, Cheryl \(LNI\); Westmoreland, Diane \(LNI\):](#)
Subject: FW: Labor and Industries" comments on Lead Chemical Action Plan
Date: Monday, October 27, 2008 10:46:32 AM
Attachments: [L and I comments Lead Chemical Action Plan.doc](#)
[Lead Chemical Action Plan with DOSH comments.doc](#)

Holly,

Good morning. I would like you to consider this as an addendum to my comments on the *Washington State Lead Chemical Action Plan (Public Review Draft) 2008*

Department of Ecology Publication No. 08-07-009. My comments were forwarded to you by Janet Kenney, Operations Manager, for the Division of Occupational Safety and Health here at L&I on October 6, 2008.

Please incorporate or consider the following additional information with respect to Recommendation #6, page 219 of the report, concerning the recommendation to conduct a statewide survey on occupational use and exposure to lead:

Within the Department of Labor and Industries' Industrial Insurance Services Division there is a research program known as SHARP (Safety and Health Assessment and Research for Prevention) which has maintained the Washington State Adult Blood Lead Registry for a number of years. SHARP has noted that the New Jersey lead program found a lead users survey to have merit in assisting with targeting educational efforts. To that end, our L&I SHARP program would be interested in conducting a statewide business survey if such a survey is recommended by the Lead CAP and if the necessary resources are made available through the DOE lead initiative or appropriate subsequent legislation.

Thanks for the opportunity for our agencies to collaborate on the CAP lead effort. Have a great day.

Steve.

Stephen M. Cant, CIH

Assistant Director

Division of Occupational Safety & Health

Department of Labor & Industries

(360) 902-9166

Cant235@Lni.wa.gov

From: Kenney, Janet E. (LNI)
Sent: Monday, October 06, 2008 5:42 PM
To: Davies, Holly (ECY)
Cc: Christian, Cheryl (LNI); Westmoreland, Diane (LNI)
Subject: Labor and Industries' comments on Lead Chemical Action Plan

Dear Ms. Davies,

On behalf of Steve Cant, Assistant Director of the Division of Occupational Safety and Health, I am forwarding you the Department of Labor and Industries' comments on the Washington State Lead Chemical Action Plan. We appreciate the considerable time and effort that went into preparing this report, and the opportunity to provide comments. We are also pleased with the work of our representative, Cheryl Christian, and her participation in this effort.

Attached is a letter providing a summary of our comments. We have also included a copy of the report with our comments embedded at appropriate sections. These represent our collective comments from the Division of Occupational Safety and Health. We would be pleased to talk with you further if you have any questions about the information provided. Thank you again for the opportunity to provide feedback.

Janet Kenney, Operations Manager
Division of Occupational Safety & Health
Department of Labor & Industries
P.O. Box 44600 Olympia, WA 98504-4600
(360) 902-5430 KENK235@LNI.WA.GOV

From: Thomas Perry

Sent: Tuesday, September 02, 2008 10:25:07 PM

To: Davies, Holly (ECY)

CC: Kevin Zinger; Bob Brown; bobbie thorniley; Buzzi Cook; chip mcbroom; DAVID WALTER; DICK LAPINSKI; ed owens; GARY DEJARLAIS; Gary Tennison; JIM MULLEN; JOE GREENHAW; Red Nierstheimer; Tony Wells; RAY HECOX; NICK WHITE; Jim Pearson; JAMES HURLBURT; Glenn Rasmussen; Gary Christensen; ERIC RASMUSSEN; DEL TOWELL; Debbie Barrett; BOB HALL; ARNOLD LOCKBEAM; Arlein Anderson; Neil Amondson; Randy Bauman; Jennifer Beauchene; Lyle Bonny; Kevin Bulow; Randel Bunch; Nathan Burkepile; Steve Clark; Lloyd Cook; Paul Dressel; Jim Ellinger; Michael Freepons; Louis Garcia; Lanny Gill; Mike Hammond; Wayne Hansen; Randal Holmgrain; Ed Labissoniere; Garry Mathews; Rick Mclean; KEN NAGEL; Linda North; Michael Parnell; Tim Powell; Mitch Rohlf; Ric Shirrod; Steve Simon; Lee Spurgin; Jamie Whitney; Douglas Edward Wrung; Mark Young; Bill Shield

Subject: Lead chemical action plan

Greetings Ms Davies---

As president of the Hunters Heritage Council, one of my duties is to review potential legislation and gauge its effect on the hunting community. I have accordingly reviewed the DOE's lead chemical action plan.

With regard to the proposed ban on lead shot and bullets, there appears to be no evidence of chemical toxicity to humans. A good deal of hearsay and rumor is cited, but nothing concrete.

Certainly, the ingestion of lead shot is known to be toxic to waterfowl, and current hunting regulations address that issue adequately; no more action is necessary. Probably an occasional raptor may get lead toxicity from its prey, but the numbers are very small, too tiny to be statistically significant, with only a few anecdotal reports. Certainly no species will be endangered. The same evidence applies to lead sinkers. It is simply very hard to envision a biologically significant effect.

Lastly although it does not affect us, the banning of lead wheel weights is just plain silly. I recommend that any legislation based on this document be vigorously opposed.

Tom Perry, President
Hunters Heritage Council

King County
Solid Waste
Division

King County
Water and Land
Resources
Division

Public Health
Seattle &
King County

Seattle Public
Utilities

Suburban Cities
Association



Local Hazardous Waste Management Program in King County, Washington

October 6, 2008

Holly Davies
CAP Developer
Solid Waste & Financial Assistance Program
Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

*Participating
Cities:*

*Algona
Auburn
Beaus Arts
Bellevue
Black Diamond
Bothell
Burien
Carnation
Clyde Hill
Covington
Des Moines
Duvall
Enumclaw
Federal Way
Hunts Point
Issaquah
Kenmore
Kent
Kirkland
Lake Forest Park
Maple Valley
Medina
Mercer Island
Newcastle
Normandy Park
North Bend
Pacific
Redmond
Renton
Sammamish
SeaTac
Shoreline
Skykomish
Snoqualmie
Tukwila
Woodinville
Yarrow Point*

RE: COMMENTS ON DRAFT LEAD CHEMICAL ACTION PLAN

Ms. Davies:

I am writing on behalf of the Local Hazardous Waste Management Program in King County (Program) to provide our comments on the draft Washington State Lead Chemical Action Plan (CAP.) Our Program is a regional partnership that includes Seattle Public Utilities, Public Health–Seattle & King County, Suburban Cities Association, King County Solid Waste Division and King County Water & Land Resources Division. We serve over 1.8 million people throughout King County, which is approximately 1/3 of the State's population. Our strategic goals include reducing the toxicity of consumer products and the exposures of vulnerable populations, including children, to those products. Ecology's Lead CAP is a step forward in identifying exposures to lead by children, adults, and the environment, and in recommending actions to reduce those exposures.

On behalf of our Program Partners, we would like to provide the following recommendations that we believe would strengthen Ecology's Lead CAP. We suggest that you:

1. Encourage and support businesses to explore the use of alternatives to lead in their processes and products, and to provide effective exposure controls if lead usage is unavoidable;
2. Prioritize the elimination of lead in children's products. We support the protective 40 p.p.m. limit on total lead content in children's products recommended by the American Academy of Pediatrics, as there is no safe level of exposure of children to lead;
3. Legislate bans of specific lead containing products when safer alternatives are available. With regard to wildlife and the environment, we support a ban on lead wheel weights in Washington in favor of environmentally safer and steel wheel weights. Lead wheel weights have been banned in the European Union since 2005 and will be prohibited in California beginning in 2010;
4. Incorporate the Washington State Department of Health (DOH) Childhood Lead Exposure Advisory Panel's recommendations submitted to DOH on June 27,

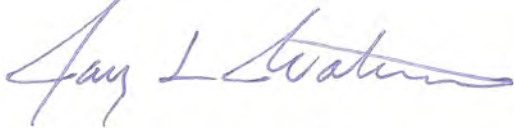
2008, into the final CAP. Those recommendations including the following statements:

- a. There is no safe level of lead in children;
 - b. Washington State possesses legitimate, well documented risk factors for childhood lead poisoning;
 - c. Washington State has one of the poorest records of lead screening of young children;
 - d. Primary prevention should be DOH's highest lead priority;
 - e. Key messaging and multi-media approaches should be utilized in reaching specific audiences;
 - f. DOH is urged to support, integrate, and collaborate with local agencies;
 - g. Increased surveillance is critical in measuring the problem such as a compensated sentinel system effort;
 - h. Creation and use of a physician questionnaire to identify children who should be screened, should be implemented;
 - i. DOH should implement a parent education program, with the possible inclusion of a pilot one-year Child Profile mailing;
 - j. Blood lead levels (BLL) between 5-9 µg/dL are damaging to children; and,
 - k. The Washington State Lead Exposure Guidelines should be reviewed every five years.
5. Support recommendations that address reducing lead exposures in adults. The Program recognizes that the levels of lead to which workers may legally be exposed exceed those that have been demonstrated to cause adverse health effects in adults. Specifically we suggest:
- a. The Washington State Department of Labor and Industries (L&I) should reevaluate the requirements to remove workers from the workplace due to lead exposures. The current medical removal level is a BLL of 50-60 µg/dL, depending on whether the worker is covered by the Construction or General Industry standard. Neither standard is based on our current understanding of lead toxicity. L&I should adopt the comprehensive recommendations for lead workers put forward by the 2007 Association of Occupational and Environmental Clinics (AOEC,) which includes a recommendation for removal from work when chronic BLLs reach 30 µg/dL or more;
 - b. L&I's Division of Occupational Safety and Health Program should prioritize high hazard industries to ensure compliance with the existing lead standards;
 - c. L&I should develop and provide up-to-date information and materials for health care providers, business owners, and workers, about the hazards of lead to adults and ways to reduce exposures. These materials should include recent findings of adverse health effects at relatively low lead levels;
 - d. The trigger for medical surveillance (including BLL testing) under the General Industry standard should not rely solely on exceedence of an air-lead level. Workers should be included in a medical surveillance program, whenever they are handling or distributing materials with a significant lead content in a manner that could reasonably be expected to cause potentially harmful exposures through inhalation or ingestion. Surface wipe sampling should be required, to identify lead contamination and in order to provide additional protection from the

- ingestion of lead. Medical surveillance should be conducted according to the 2007 AOEC medical management guidelines; and,
- e. L&I should conduct a statewide survey on occupational use, and exposure to, lead, to help L&I locate as yet unidentified lead-exposed workers. The survey should assess compliance with current regulations in known industries, identify new industries with lead exposures, and identify vulnerable worker populations. This study should include BLL testing to ensure that all potentially exposed workers are tested, regardless of whether BLL testing for these individuals is required by OSHA regulations.
6. Support efforts to eliminate mixing zones in Puget Sound and other waterways for lead and other bioaccumulative materials;
 7. Development of a Washington State Healthy Housing Program or support for development of local programs. Components to a Healthy Housing Program could include, but are not limited to:
 - a. Comprehensive education and assistance to tenants, homeowners, and landlords on lead poisoning prevention;
 - b. Regulatory authority to enforce adjacent property contamination caused by sanding of houses with lead-based paint; and,
 - c. Ability to address other healthy housing issues such as indoor air quality, integrated pest management, cleanability, and chemical concerns of building materials.
 8. Promote environmentally preferable purchasing and the creation of purchasing specifications for lead-free alternative products to be used by Washington State and local agencies;
 9. Create standards for lead in synthetic playfields purchased by Washington State, local agencies, and school districts; and,
 10. Require product stewardship for cradle-to-cradle management of products containing lead, where there are no alternatives. We support producer-provided product stewardship programs to reuse or appropriately dispose of lead products, to minimize human contact and environmental contamination. Producers are best suited to utilize their supply-chain relationships to create efficient take-back programs and can have the most impact on improvements in product design that reduce toxic content and maximize reusability.

If you have any questions or need more information about our recommendations, please feel free to contact me at jay.watson@kingcounty.gov or at (206) 352-8163.

Sincerely;



Jay L. Watson, Ph.D.
Administrator

NATIONAL RIFLE ASSOCIATION OF AMERICA
INSTITUTE FOR LEGISLATIVE ACTION

11250 WAPLES MILL ROAD
FAIRFAX, VIRGINIA 22030



NRA

October 6, 2008

Holly Davies
Dept of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Dear Ms Davies:

The National Rifle Association (NRA) appreciates the opportunity to comment on the Lead Chemical Action Plan (Lead CAP) prepared by the Department of Ecology (DOE). It is with great concern that the NRA submits these comments on behalf of our more than 75,000 members in the State of Washington.

The premise of the Lead CAP is that "there is no known safe level of lead." The goal is to "identify actions that will eliminate threats to human health and the environment by reducing and phasing out the uses, releases and exposures to lead in Washington." This statement provides a basis for the Lead CAP to make recommendations that could start Washington down the path of severe restrictions on lead ammunition. Past experience with PCBT and mercury measures adopted by the legislature show that the Lead CAP is likely the first step in an effort to ban lead in general and lead ammunition in particular.

The DOE has raised concerns about the messages that the NRA sent to its members regarding the Lead CAP because we warned that it will lead to a ban on lead ammunition. The NRA acknowledges that the Lead CAP, in and of itself, does not ban lead ammunition and the NRA never suggested that it would. The NRA pointed out in its alerts that lead ammunition would be banned if the DOE had its way. Since the Lead CAP is a DOE document and it explicitly and implicitly recommends lead ammunition bans, the NRA stands by its alerts to members. Following are quotes taken directly from the Lead CAP:

The Lead CAP states that "Products that do not need lead and directly expose wildlife include wheel weights, small fishing weights, and some ammunition." The NRA infers from this that if the Lead CAP suggests some ammunition "does not need lead" then it follows that such ammunition should be banned and alternatives be produced from other materials. Further, the Lead CAP includes a cost analysis of banning lead shot. If a ban is not a consideration then why is the DOE analyzing the cost of such action? Recommendation 9 of the Lead CAP calls for a "phase out of lead shot." Although the DOE may try to argue otherwise, "phase out" and "ban" are synonymous.

The NRA has seen multiple DOE staff responses to NRA members who submitted comments to the Lead CAP. The responses have been unequivocal in their assertion that there is "no proposed ban on lead ammunition in the Lead CAP." The DOE even recruited the Washington Department of Fish and Wildlife (WDFW) in an attempt to bolster its claim that the lead

ammunition portion of the Lead CAP is merely a framework for a voluntary effort to reduce the use of lead ammunition in the State of Washington.

We were forwarded a message authored by Dave Ware at the WDFW stating that the Lead CAP "lists many sources of lead to which people are exposed. Ammunition is just one of those. This plan does not propose to ban or regulate lead ammunition beyond what is currently in law. This includes all shotgun, rifle and handgun loads." Further on, he adds that "The Washington Department of Ecology and other sponsors of the Lead CAP want to work with hunters and shooters to reduce toxic lead in the state's environment by promoting the use of non-toxic alternatives. The purpose is to protect both people and wildlife, without negatively affecting hunting and shooting."

Mr. Ware's comments are simply not supported by Lead CAP Recommendation 9 which reads: "We recommend a statewide ban on the use of lead shot for recreational purposes as it maintains our focus on primary prevention and not waiting until harm to a population has been shown. Steel shot and other non-lead alternatives are widely available. The requirement to use non-lead shot would not apply to any law enforcement uses, including training. The ban may include other exemptions, such as for certain antique shotguns that cannot use non-lead shot." Contrary to the protestations of the DOE and their colleagues at the WDFW, the Lead CAP clearly contemplates lead ammunition prohibitions and the NRA is adamantly opposed to such prohibitions.

The remainder of the NRA's comments will address, more generally, issues with the Lead CAP other than those directly associated with the banning of lead ammunition. The Lead CAP claims to describe the impact on human health and the environment associated with the use and release of lead but it fails to document a single situation in Washington where lead ammunition has caused a human health problem. Although the Lead CAP provides anecdotes about how lead ammunition has harmed wildlife (other than as intended), the examples are not recent and most of the cited examples do not apply to Washington's resident wildlife species. Proven science, not outdated and irrelevant anecdotes, is the only acceptable standard for consideration of a reduced use of lead shot and the Lead CAP does not present proven science to justify the proposed actions.

Claims are made in the Lead CAP that a problem exists with venison contaminated by lead bullets. This information is out-of-date and, it turns out, unsubstantiated. The issue over contaminated venison came from a recommendation made to food banks in North Dakota not to distribute venison donated by hunters because of lead particles that were found in some packages. Subsequent to that action, government officials from the states of North Dakota, South Dakota, Iowa, Michigan, Missouri, Wisconsin, and Minnesota met and determined that there was no data suggesting that hunters and their families, nor food bank recipients, were at risk from consuming venison. In fact, the State of Iowa has accumulated blood sample data from about 500,000 youth and 25,000 adults over the past 15-16 years clearly documenting that lead in venison is not hazardous. It is highly inappropriate and grossly misleading to the public for the DOE to include these claims in the Lead CAP.

The Lead CAP seeks to further bolster its premise about lead ammunition by providing anecdotal information about the California condor, a species not present in Washington. The Lead CAP fails to provide a balanced presentation of the California situation by ignoring the possible unintended and negative consequences associated with "reducing the release of lead into the environment" in California. In addition to the significantly higher cost of lead-free ammunition there is a documented general lack of availability for the ammunition now required in California. The combination of cost and lack of availability could very well lead to a decline in the number of hunters in the field and lost hunting-related license revenue. The lack of discussion of both sides of these issues makes for a very one-sided presentation and the Lead CAP's credibility suffers as a result.

The methodology used to arrive at the quantity of lead ammunition expended in Washington is so poorly done as to be useless. The Lead CAP acknowledges that the numbers are mere assumption-based estimates from WDFW staff with no actual research done to confirm the figures. Despite this, the questionable data was left in the Lead CAP. Compounding this flaw is the fact that the economic analysis fails to take into account that equipment replacement is often necessary before lead-free ammunition can be used. Further, the conversion to lead-free alternatives is not practical for target and skeet/trap shooters and muzzle-load hunters.

As the NRA was finalizing these comments, our members were notifying us that DOE had changed its position with respect to Recommendation 9. Rather than insisting that "there is no proposed ban on lead ammunition in the Draft Lead CAP", the new message coming out of the DOE is that lead ammunition prohibition language (page 233, Recommendation 9) was "inadvertently left in the Draft CAP" and that "this language has been deleted." This action completely substantiates the NRA's concerns and calls into question the credibility of any claims made by those who go forward advocating for a voluntary approach to reduce the use of lead. Even if these claims are taken at face value, the question remains: What about all the other explicit and implicit suggestions for a lead ammunition prohibition?

In conclusion, it is the NRA's view that there was a preconceived idea in the minds of many parties involved in the development of the Lead CAP that lead, especially lead ammunition, should be phased out of commerce in the State of Washington and that the report was drafted to support that predetermined objective. As such, and specifically with respect to lead ammunition, the Lead CAP reads more like a political statement than a reasoned, scientifically-supported public document.

The Lead CAP does not identify specific portions of Washington's population nor environment that are suffering from the current use of lead ammunition for hunting and/or sport shooting. The Lead CAP, as it relates to hunting and sport shooting, is flawed in its use of anecdotal information and assumption-based estimates as justification for its recommendations, is silent on critical economic impacts and seriously flawed on others and draws some of its conclusions related to hunting and sports shooting from outdated or faulty information sources.

Since the Lead CAP cannot identify current, specific lead problems associated with hunting or sport-shooting, it has no means to measure success with regard to either an outright prohibition or lower-threshold restrictions on the use of lead ammunition. For these reasons, the NRA recommends and requests that all references to lead ammunition, and restrictions on such, be removed from the Lead CAP.

Sincerely,


Susan Recce

Director

Conservation, Wildlife and Natural Resources

October 6, 2008

Holly Davies
Dept of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Dear Ms Davies:

The National Rifle Association (NRA) appreciates the opportunity to comment on the Lead Chemical Action Plan (Lead CAP) prepared by the Department of Ecology (DOE). It is with great concern that the NRA submits these comments on behalf of our more than 75,000 members in the State of Washington.

The premise of the Lead CAP is that "there is no known safe level of lead." The goal is to "identify actions that will eliminate threats to human health and the environment by reducing and phasing out the uses, releases and exposures to lead in Washington." This statement provides a basis for the Lead CAP to make recommendations that could start Washington down the path of severe restrictions on lead ammunition. Past experience with PCBT and mercury measures adopted by the legislature show that the Lead CAP is likely the first step in an effort to ban lead in general and lead ammunition in particular.

The DOE has raised concerns about the messages that the NRA sent to its members regarding the Lead CAP because we warned that it will lead to a ban on lead ammunition. The NRA acknowledges that the Lead CAP, in and of itself, does not ban lead ammunition and the NRA never suggested that it would. The NRA pointed out in its alerts that lead ammunition would be banned if the DOE had its way. Since the Lead CAP is a DOE document and it explicitly and implicitly recommends lead ammunition bans, the NRA stands by its alerts to members. Following are quotes taken directly from the Lead CAP:

The Lead CAP states that "Products that do not need lead and directly expose wildlife include wheel weights, small fishing weights, and some ammunition." The NRA infers from this that if the Lead CAP suggests some ammunition "does not need lead" then it follows that such ammunition should be banned and alternatives be produced from other materials. Further, the Lead CAP includes a cost analysis of banning lead shot. If a ban is not a consideration then why is the DOE analyzing the cost of such action? Recommendation 9 of the Lead CAP calls for a "phase out of lead shot." Although the DOE may try to argue otherwise, "phase out" and "ban" are synonymous.

The NRA has seen multiple DOE staff responses to NRA members who submitted comments to the Lead CAP. The responses have been unequivocal in their assertion that there is "no proposed ban on lead ammunition in the Lead CAP." The DOE even recruited the Washington Department of Fish and Wildlife (WDFW) in an attempt to bolster its claim that the lead

ammunition portion of the Lead CAP is merely a framework for a voluntary effort to reduce the use of lead ammunition in the State of Washington.

We were forwarded a message authored by Dave Ware at the WDFW stating that the Lead CAP "lists many sources of lead to which people are exposed. Ammunition is just one of those. This plan does not propose to ban or regulate lead ammunition beyond what is currently in law. This includes all shotgun, rifle and handgun loads." Further on, he adds that "The Washington Department of Ecology and other sponsors of the Lead CAP want to work with hunters and shooters to reduce toxic lead in the state's environment by promoting the use of non-toxic alternatives. The purpose is to protect both people and wildlife, without negatively affecting hunting and shooting."

Mr. Ware's comments are simply not supported by Lead CAP Recommendation 9 which reads: "We recommend a statewide ban on the use of lead shot for recreational purposes as it maintains our focus on primary prevention and not waiting until harm to a population has been shown. Steel shot and other non-lead alternatives are widely available. The requirement to use non-lead shot would not apply to any law enforcement uses, including training. The ban may include other exemptions, such as for certain antique shotguns that cannot use non-lead shot." Contrary to the protestations of the DOE and their colleagues at the WDFW, the Lead CAP clearly contemplates lead ammunition prohibitions and the NRA is adamantly opposed to such prohibitions.

The remainder of the NRA's comments will address, more generally, issues with the Lead CAP other than those directly associated with the banning of lead ammunition. The Lead CAP claims to describe the impact on human health and the environment associated with the use and release of lead but it fails to document a single situation in Washington where lead ammunition has caused a human health problem. Although the Lead CAP provides anecdotes about how lead ammunition has harmed wildlife (other than as intended), the examples are not recent and most of the cited examples do not apply to Washington's resident wildlife species. Proven science, not outdated and irrelevant anecdotes, is the only acceptable standard for consideration of a reduced use of lead shot and the Lead CAP does not present proven science to justify the proposed actions.

Claims are made in the Lead CAP that a problem exists with venison contaminated by lead bullets. This information is out-of-date and, it turns out, unsubstantiated. The issue over contaminated venison came from a recommendation made to food banks in North Dakota not to distribute venison donated by hunters because of lead particles that were found in some packages. Subsequent to that action, government officials from the states of North Dakota, South Dakota, Iowa, Michigan, Missouri, Wisconsin, and Minnesota met and determined that there was no data suggesting that hunters and their families, nor food bank recipients, were at risk from consuming venison. In fact, the State of Iowa has accumulated blood sample data from about 500,000 youth and 25,000 adults over the past 15-16 years clearly documenting that lead in venison is not hazardous. It is highly inappropriate and grossly misleading to the public for the DOE to include these claims in the Lead CAP.

The Lead CAP seeks to further bolster its premise about lead ammunition by providing anecdotal information about the California condor, a species not present in Washington. The Lead CAP fails to provide a balanced presentation of the California situation by ignoring the possible unintended and negative consequences associated with "reducing the release of lead into the environment" in California. In addition to the significantly higher cost of lead-free ammunition there is a documented general lack of availability for the ammunition now required in California. The combination of cost and lack of availability could very well lead to a decline in the number of hunters in the field and lost hunting-related license revenue. The lack of discussion of both sides of these issues makes for a very one-sided presentation and the Lead CAP's credibility suffers as a result.

The methodology used to arrive at the quantity of lead ammunition expended in Washington is so poorly done as to be useless. The Lead CAP acknowledges that the numbers are mere assumption-based estimates from WDFW staff with no actual research done to confirm the figures. Despite this, the questionable data was left in the Lead CAP. Compounding this flaw is the fact that the economic analysis fails to take into account that equipment replacement is often necessary before lead-free ammunition can be used. Further, the conversion to lead-free alternatives is not practical for target and skeet/trap shooters and muzzle-load hunters.

As the NRA was finalizing these comments, our members were notifying us that DOE had changed its position with respect to Recommendation 9. Rather than insisting that "there is no proposed ban on lead ammunition in the Draft Lead CAP", the new message coming out of the DOE is that lead ammunition prohibition language (page 233, Recommendation 9) was "inadvertently left in the Draft CAP" and that "this language has been deleted." This action completely substantiates the NRA's concerns and calls into question the credibility of any claims made by those who go forward advocating for a voluntary approach to reduce the use of lead. Even if these claims are taken at face value, the question remains: What about all the other explicit and implicit suggestions for a lead ammunition prohibition?

In conclusion, it is the NRA's view that there was a preconceived idea in the minds of many parties involved in the development of the Lead CAP that lead, especially lead ammunition, should be phased out of commerce in the State of Washington and that the report was drafted to support that predetermined objective. As such, and specifically with respect to lead ammunition, the Lead CAP reads more like a political statement than a reasoned, scientifically-supported public document.

The Lead CAP does not identify specific portions of Washington's population nor environment that are suffering from the current use of lead ammunition for hunting and/or sport shooting. The Lead CAP, as it relates to hunting and sport shooting, is flawed in its use of anecdotal information and assumption-based estimates as justification for its recommendations, is silent on critical economic impacts and seriously flawed on others and draws some of its conclusions related to hunting and sports shooting from outdated or faulty information sources.

Since the Lead CAP cannot identify current, specific lead problems associated with hunting or sport-shooting, it has no means to measure success with regard to either an outright prohibition or lower-threshold restrictions on the use of lead ammunition. For these reasons, the NRA recommends and requests that all references to lead ammunition, and restrictions on such, be removed from the Lead CAP.

Sincerely,

Susan Recce
Director
Conservation, Wildlife and Natural Resources



NATIONAL SHOOTING SPORTS FOUNDATION, INC.

FLINTLOCK RIDGE OFFICE CENTER • 11 MILE HILL ROAD • NEWTOWN, CT 06470-2359

TEL (203) 426-1320 • FAX (203) 426-1087 • EMAIL lkeane@nssf.org • www.nssf.org

LAWRENCE G. KEANE
SENIOR VICE PRESIDENT &
GENERAL COUNSEL

RECEIVED

October 3, 2008

OCT 06 2008

Holly Davies
LCAP Developer Ecology - SWFA - Ind
Dept of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Re: Lead Chemical Action Plan (CAP) -- OPPOSE

Dear Ms. Davies:

The National Shooting Sports Foundation (NSSF), the trade association for the firearms, ammunition, hunting and recreational shooting sports industry, opposes the Lead Chemical Action Plan (LCAP) in its current draft format. We are deeply troubled by the fact that members of the firearm and ammunition industry, and the NSSF as the industry's trade association, were never contacted by the Department of Ecology for input or consultation regarding alleged hazards to human health and/or wildlife from the use of traditional ammunition. We are concerned that the LCAP is motivated by an anti-hunting agenda and is laying the groundwork to ban traditional ammunition by regulation or legislation. We consider the report to have been written with a preordained policy objective. The report is based on assumptions unsupported by science. There is no credible peer-reviewed scientific evidence that the use of traditional ammunition by hunters and those that consume harvested game presents a human health risk. Moreover, the report is predicated on a "zero" tolerance model and assumes "There is no known safe level of lead," ignoring scientific research by the EPA and OSHA, among other regulatory agencies, with established thresholds at which blood lead levels are considered elevated.

We find it curious that after releasing the draft for public comment, portions of the draft that would ban the use of target shooting ammunition, was in essence repealed by the Department. We suspect this was done purposely and in response to growing opposition from the sportsmen and gun owners' community. The report looks at the alleged lead risk exposure on the basis of individual animals rather than on managing the population of a species, which is the accepted approach to wildlife management.

The Department's effort to ban the use of ammunition by hunters will have a detrimental effect on the funding of conservation efforts in the State of Washington. This regulation will decrease the number of sportsmen in Washington, which will undoubtedly lead to the loss of our hunting heritage with future generations.

Our industry is proud of its strong presence and economic impact in Washington. But we are equally mindful of the important role sportsmen play in Washington's economy. Sportsmen in Washington State spend over **\$1.4 billion** each year, generating **\$95 million in taxes** and supporting over **23,000 jobs**. The federal excise tax sportsmen willingly pay on their ammunition and firearms supports wildlife conservation efforts in which Washington received over **\$5.2 million** in fiscal year 2007. This conservation funding will likely increase in the coming years, but if a lead ban goes into effect for Washington State, it will most definitely produce a precipitous decrease.

Our membership includes Washington-based federally licensed firearms retailers, most of which are small "mom-n-pop" businesses that are the backbone of Washington's economy. There are 837 federally licensed retailers in the state and that number will surely drop with the introduction of this lead ban. This will of course impact mostly rural communities since these businesses are the ones that bring tax revenue to the small towns and provide the jobs for the citizens. Even on the state level, ignoring the fact that Pittman Robinson funds will dry up, sales tax revenue will decrease right in step with firearms sales.

NSSF opposes the banning of lead ammunition, also known as traditional ammunition. Recently many attempts have been made to scare good people into thinking lead ammunition poses a danger to (1) individuals consuming game that had been harvested using traditional ammunition, and (2) endangered species (i.e. the California Condor) feeding off of gut piles. There is simply no evidence or science to support either fear.

This is why NSSF, along with countless other conservation and sportsmen's groups, supports further scientific research with conclusive results, not hypothesis or consensus, before a measure as drastic as banning lead ammunition is even considered. The results and research that have already been considered are far from credible and not produced by independent non-biased groups.

The entire draft of the LCAP is filled with inflammatory language that seeks to use lead as a means to end hunting in Washington State. The author cites throughout the entire document studies that have not provided clear or conclusive results, have not been peer reviewed, or have since been discredited by subsequent studies. Statements such as "Fishing, hunting, and shooting deposit lead into the environment and the major exposure is to wildlife." The problem with this statement is that traditional ammunition has never been proven to have a species population level impact in wildlife. Lead is a naturally occurring element that is readily accessible to wildlife and simply blaming ammunition is irresponsible and naïve.

For more than a century, hundreds of millions of Americans have safely consumed game harvested using traditional hunting ammunition and have reloaded their own ammunition at home without any health concerns.

Earlier this year "contaminated" venison was removed from food pantries and food banks used to feed the homeless because of an overreaction to a politically motivated individual. This was pointed out and incorrectly cited on page 99 of the LCAP document "There have been recent

reports in the U.S. media of venison that was contaminated with lead ammunition fragments (Associated Press 2008).” First off, citing the entire Associated Press is not a conclusive or detailed source, but further investigation into the matter reveals that this situation was magnified by anti-hunting groups whose sole objective was to create a highly publicized event to damage hunting.

There has been absolutely no peer-reviewed scientific evidence to support the unfortunate and unnecessary overreaction by North Dakota and Minnesota officials to take nourishing, high-protein food out of the mouths of the needy by requiring food banks to discard tons of venison donated by hunters because of an unwarranted fear of lead poisoning.

To help put in perspective the outlandish claims concerning the safety of game harvested using traditional ammunition, consider this statement from the Iowa Department of Public Health (IDPH) – a state agency that has conducted an extensive panel of blood-lead testing for more than fifteen years: "IDPH maintains that if lead in venison were a serious health risk, it would likely have surfaced within extensive blood lead testing since 1992 with 500,000 youth under 6 and 25,000 adults having been screened." It has not.

Currently the state of North Dakota, working with the Center for Disease Control, is in the process of testing individuals within the state to determine if there is any correlation at all between consuming game and a resulting elevated lead level. Preliminary results from the CDC tests have shown that there are no elevated lead levels even remotely approaching levels considered dangerous. These results are far from final but do provide a glimpse into the fact that lead levels are not elevated. This experiment will provide one data point but should not be used to conclusively determine the course of traditional ammunition bans.

NSSF is very concerned about the entire process that went into developing the LCAP document. The drastic step of banning lead in ammunition will not only cripple wildlife conservation funding for the State of Washington, but also will have a tremendous economic impact. The Department of Ecology supposedly has worked in close cooperation with an advisory group that consisted of businesses, health, environmental and sporting interests. Unfortunately, the Department has seemed to overlook NSSF, the trade association of the firearms and ammunition industries, for any input and has not once reached out to industry to discuss the impact that a lead ban will have on them or sportsmen.

The California Condor and Lead Ammunition

In California, anti-hunting groups and radical environmentalists waged a strong lobbying campaign to ban lead ammunition, citing allegations that lead is poisoning the California Condor.

Some condors have shown elevated levels of lead, a naturally occurring element found in batteries, light bulbs, paint chips and many other items found in condor nests; incidentally, these lead-based items have never been tested as a possible source of elevated lead levels in condors. This is especially noteworthy when one considers that there is no credible scientific evidence to

support the notion that higher lead levels in condors are due to the ingestion of ammunition fragments.

While the Executive Committee of the Condor Recovery Team joined with the NSSF and numerous conservation and sportsmen's groups to support the adoption of science-based voluntary, non-ban measures -- measures that would have served to interrupt the potential pathways for the ingestion of lead bullet fragments by condors -- Governor Schwarzenegger chose to disregard science and the opinions of experts by signing into law legislation banning lead ammunition for hunting in the Golden State. This lead ammunition ban went into effect on July 1, 2008.

The ban on traditional ammunition will do nothing to help the California Condor. It will however hurt many Californians and the economy within the state. There have already been preliminary findings that show hunting licenses have seen a tremendous decrease since the implementation of the lead ban. Time will tell and more data will be needed before conclusions can be reached concerning the cause of such a precipitous drop.

A survey conducted by the Responsive Management Company confirmed that California hunters strongly support a program of voluntary measures, not a lead ammunition ban, which would help avoid the ingestion of lead bullet fragments by condors.

In summary, the survey results showed the following:

- The majority (68 percent) of California hunters oppose a mandatory ban on the use of lead ammunition. Most are in strong opposition to such a ban.
- Approximately 25 percent of hunters would either quit big game hunting or hunt less in California if a ban was adopted (15 percent would hunt in another state, 8 percent would hunt less frequently, and 2 percent would quit hunting altogether).
- Most hunters (73 percent) indicated that they would be likely to participate in some or all of the voluntary measures that would help prevent condor exposure to lead from ammunition.

At present, non-lead big game hunting ammunition is a very limited source technology, with hunters having finite availability of non-lead ammunition suitable for taking big game. Furthermore, the long term toxicity of substitute metals in ammunition has not yet been tested and many hunters would not be able to find non-lead ammunition for their own particular big game rifle due to the scarcity of alternative metals. Additionally, would-be substituted metals are more expensive than conventional ammunition thereby further discouraging lawful hunting.


Conclusion

Despite there being no scientific evidence to support the hypothesis that lead ammunition is endangering the health of individuals, the California Condor or any other wildlife, anti-hunting interest groups are continuing to press state legislatures and departments around the country to support a ban on traditional ammunition. These politically driven groups understand that while an outright ban on hunting would be nearly impossible to achieve, dismantling the culture of

Ms. Holly Davis
October 3, 2008
Page 5 of 5

hunting one step at a time is a substitute goal. Banning lead ammunition is a first step -- a step that is literally taking the food out of the mouths of the hungry, unnecessarily, to advance a political agenda. Much more research on the actual claims of toxicity in humans must be done prior to even considering abolishing the use of lead in ammunition.

Sincerely,

A handwritten signature in black ink, appearing to read "Lawrence G. Keane". The signature is fluid and cursive, with the first name "Lawrence" and last name "Keane" clearly distinguishable.

Lawrence G. Keane

LGK/mas

CC: Jay Manning, Director of Washington Department of Ecology
Governor Christine Gregoire

From: NWExplorer2005@aol.com
Sent: Wednesday, September 24, 2008 4:19:43 PM
To: Davies, Holly (ECY)
CC: blake.brian@leg.wa.gov; orcutt.ed@leg.wa.gov; renee@dinatorossi.com; wallace.deb@leg.wa.gov; Commission, Fish & Wildlife (DFW)
Subject: Lead Action Plan - Banning Hunting Lead in Washington

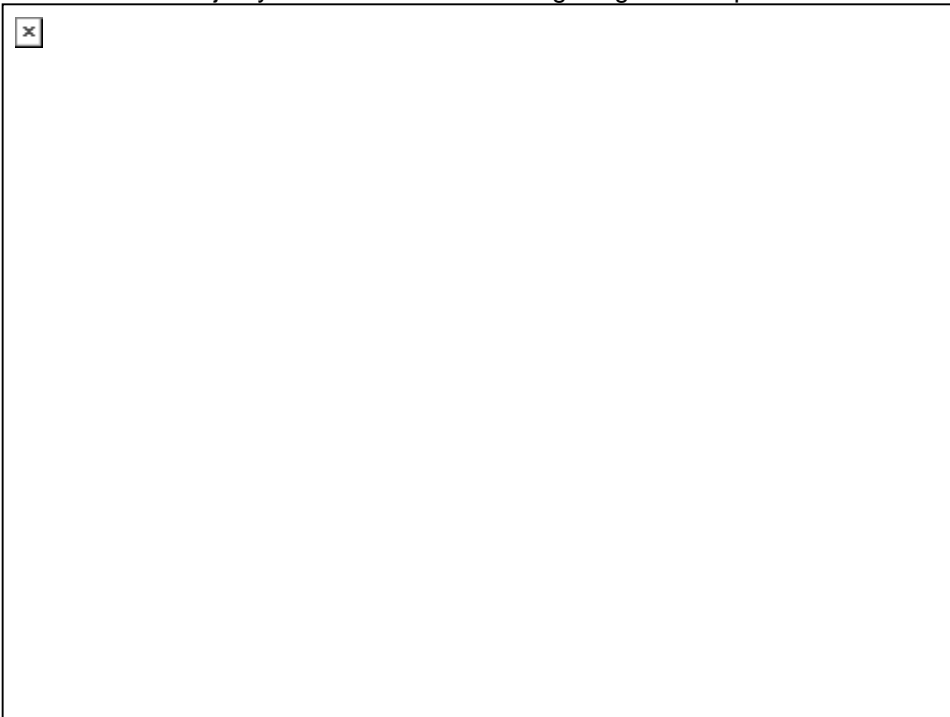
Holly Davies
Dept of Ecology
P.O. Box 47600
Olympia, WA 98504-7600
Fax: (360) 407-6102
e-mail: hdav461@ecy.wa.gov

Hello Holly,

I have to take issue with the proposed reduction or ban on Lead for hunting and target shooting. During the hunting season, the small amount of lead that is added to the environment is very small. It would probably fit in 2 hands total from across the state. The amount of lead shot during target practicing is somewhat more and should be conducted in places where the lead can be recovered...ie: shooting ranges that do not charge for sighting in personal rifles.

Approved Shooting ranges collect the spent lead and recycle it.

I am involved with Small Scale Mining and during the 2007 season, I was able to dredge up 9 lbs of lead from a nearby river. The amount of lead from bullets was so minimal that I had trouble even sorting it out. A large percentage of the bullet lead was from 22 caliber rifles and a little buckshot. The majority of lead was from Fishing weights. See picture below...



During the 2008 WDFW Permitted Season I was able to recover a total amount of 52 lbs of lead during 5 visits to the same river. This lead was composed of Fishing Weights and some 22 caliber bullets. The hunting lead was such a minor amount that banning hunting lead is not reasonable. Provide the hunters with free areas to do their sighting in. Then the lead can be recovered. The lead below is about 99 % Fishing Lead.



There is much more lead being disposed of along the waterways in Seattle than from all of the hunters.

If we were not having such a difficult time receiving approval from WDFW of our Small Scale Mining regulations with reasonable work windows we could recover so much more lead from the streams. With limited recovery times...we are almost denied the ability to clean out this lead and rusty metals from the waters of Washington.

We need your support to get our Dredging seasons extended so we can accomplish what nobody else is doing in Washington. Please help us by sending a letter to the WDFW Commissioners to support our efforts.

Thank You,

Scott Atkinson
Mineral Prospecting Gold & Fish Workgroup
President - North West Mineral Prospectors Club
Former Member of Trout Unlimited
nwexplorer2005@aol.com

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Email: nwma@nwma.org | Web: www.nwma.org

October 2, 2008

Holly Davies, Ph.D.
Chemical Action Plan Developer
Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Re: Washington State Lead Chemical Action Plan Public Review DRAFT

Dear Holly:

The Northwest Mining Association (NWMA) is submitting this letter on behalf of more than 240 members living or working in Washington State in response to the request for comments with respect to the above captioned matter.

NWMA recognizes that lead is a metal of concern, and applauds the effort of the Department of Ecology to address issues related to exposure to lead. The goals of the Lead Chemical Action Plan (CAP) need to be reasonable, appropriate, and achievable. The draft as currently written is overly ambitious, particularly in light of the current budget crisis in the State of Washington. It is estimated that Washington State will encounter a deficit between \$2.7 and \$3.2 billion over the next biennium. Rather than a "shotgun" approach to reducing the risk to human health and the environment from lead, Ecology should take a "rifle" approach and address the most vulnerable populations, i.e. children, and the known primary sources of lead contamination in children, i.e. lead paint in older homes. This approach would provide the maximum benefit from limited available resources.

Programs to reduce exposure to lead must be based on scientific data rather than emotion. Consequently, we are concerned with the definition of elevated blood lead levels in the draft CAP. Throughout the draft CAP, there are references to there being no safe levels of lead exposure. We believe a more accurate statement is that a safe level of lead exposure has not been delineated. Attached to these comments and incorporated by reference as though fully set out herein, is a letter from Rosalind A. Schoof, Ph.D., DABT, a principal in Integral Consulting, Inc., Mercer Island, Washington. We ask that you consider her comments as comments from NWMA.

While it is admirable to want to reduce blood lead levels in children to below 2 ug/dl, we must recognize that this is an unachievable standard. Lead is and always will be a part of our environment, and to deny that is to partake in the wasteful pursuit of zero.

The CAP should focus on voluntary blood lead level testing for adults who work in industries with lead exposure, the adoption of Best Management Practices and narrowly focus any regulations to lowering blood lead levels in children and the poor.

NWMA also is concerned that the discussion of mining in the section entitled “Ongoing Releases” is incomplete and therefore misleading. The table on page 138 shows that mining released 2,217 tons of lead to the air, land and water. Ecology is fully aware that more than 99% of those reported lead releases are to an engineered, triple-lined permitted facility that will be capped and covered. Therefore, those releases are not actually releases to soil, air, or water. It is important that the reader understand the minimal risk these “releases” pose to the human and natural environment. Furthermore, the reader should clearly understand that these releases to land, air, or water are fully permitted by the Department of Ecology. Likewise, the TRI table on page 139 fails to tell the reader that the onsite land releases are to an engineered, triple-lined, fully permitted facility.

On page 142, the discussion under Point Sources does not clarify for the reader that the releases to air from mines are fully permitted releases. The same is true on page 143 under the discussion for **Water**. It is not until page 146, eight pages after the beginning of the section, that the draft mentions that the “releases to land from mining” are placed in a “waste disposal land fill with safety measures such as liners, leachate collection systems and ground water monitoring.” We do not believe this adequately and fairly communicates to the reader that the TRI numbers are misleading and that more than 99% of the releases from the Pend Oreille Mine are not really releases at all because they are to a fully engineered, triple-lined and permitted facility. We recommend that this section be re-written to inform the reader of these important facts at the beginning of the discussion of mining on page 138.

NWMA objects to Recommendation 11 that Ecology should evaluate the feasibility of reducing or eliminating mixing zones for permitted facilities. We believe the statement on the bottom of page 207, under the heading **Eliminate Mixing Zones** that “mixing zones may not be appropriate for persistent bioaccumulative and toxic chemicals, including the metals of concern such as lead” is misleading. While lead is a metal of concern, it is not a persistent bioaccumulative and toxic chemical (PBT). The words “including metals of concern such as lead” are confusing and misleading. It would be easy for a reader to incorrectly conclude that lead is a PBT as well as a metal of concern. Ecology should reword this sentence to clearly indicate that lead is not a PBT.

We believe the reference to Ecology evaluating the feasibility and options to reduce or eliminate mixing zones should be eliminated from Recommendation 11. Eliminating mixing zones for lead as part of this CAP is inappropriate. The only plausible rationale for eliminating an NPDES mixing zone for lead would be if the science indicated that lead behaved as a PBT in the aquatic ecosystem. A recent peer reviewed scientific “Metals Risk Assessment” by the U.S. EPA confirms quite clearly that lead is not generally bioaccumulative in the aquatic ecosystem. In fact, EPA now states that generally inorganic lead does not bioaccumulate and that lead actually appears to biodilute in the aquatic ecosystem.

Ecology recognized the validity of the science when it changed its proposed PBT rule in 2006 and decided not to list lead as a PBT. In 2006, Ecology said that it would revisit the issue of whether lead should be restricted as a PBT depending on whether the science Ecology relied on in 2006 would be confirmed by EPA in its “Metals Risk Assessment.” With EPA’s issuance of the final “Metals Risk Assessment,” there is confirmation that Ecology was correct in 2006 when it concluded that lead should not be listed as a PBT. NWMA is not aware of any new science that would change this conclusion. Therefore, a mixing zone ban would be scientifically and economically unjustified. If we truly are attempting to make a difference with our scarce resources, it begs the question regarding mixing zones – who or what is “at risk” here? And what benefit to human health and the environment would result from reducing or eliminating mixing zones for lead?

Finally, NWMA believes that Recommendation 9 in the original draft prohibiting the use of lead shot, especially with respect to recreational uses, was wholly inappropriate, and we applaud the recent action

Lead Chemical Action Plan Comments

Page 3 of 3

taken to delete that language. There should be no statewide ban on the use of lead shot for recreational purposes. The comments submitted at the Spokane public meeting confirmed that a statewide ban on the use of lead shot is wholly inappropriate. We agree with Ecology's recommendation to work with WDFW, hunters and shooters in the development of voluntary approaches to reducing harm caused by the use of lead shot.

In addition to these comments, we also endorse the comments filed by the Washington Association of Business.

Thank you for this opportunity to comment. Please feel free to contact me if you have any questions. We look forward to continuing to work with Ecology in the development of a Lead Chemical Action Plan that focuses first on human health and the environment, especially children, and is based on a cost-benefit analysis to ensure that limited resources are allocated to where they will make the most improvement. In order to reach these goals, we believe the Lead Chemical Action Plan must be more focused than the current draft.

Sincerely,



Laura Skaer
Executive Director

LS/ds

Encl.



Integral Consulting Inc.
7900 SE 28th Street
Suite 410
Mercer Island, WA 98040

telephone: 206.230.9600
facsimile: 206.230.9601
www.integral-corp.com

July 11, 2008

David Godlewski
Vice President, Environment & Public Affairs
Teck Cominco America, Inc.
15918 East Euclid Ave
Spokane, WA 99216-1815Name

Subject: **Comments on draft *Washington State Lead Chemical Action Plan***

Dear Mr. Godlewski:

I have reviewed the principal recommendations and related text in the Public Review Draft of the *Washington State Lead Chemical Action Plan* transmitted to you via email on June 27th. My comments follow.

1. Definition of EBL: On page 214 and elsewhere (e.g., page 228), the report recommends reducing the action level for blood lead to 2ug/dL, and states that "no child should have a BLL above 2 µg/dL". Both to these goals are unreasonable and inappropriate. The current median value for BLL is 2 µg/dL. Arbitrarily defining half of all the State's children as having EBLs is not justified by the available data and does nothing to focus intervention efforts on those with the highest BLLs and the greatest need.

As described earlier in the report, all children have lead exposures from multiple diffuse sources including diet, drinking water, air, soil and for infants, the influence of maternal BLL. When no exceptional source is present these are not factors that can be targeted at the level of individual intervention. Rather they require continued broader regulatory and societal efforts such as the banning of lead solder in cans or banning lead in gasoline or consumer products.

Further it is doubtful that reducing all BLLs to below 2ug/dL is an achievable goal given the natural lead levels present in soil, food, water and air. When the IEUBK model is run with soil lead concentration at 20 ppm and all other inputs at default values, the geometric mean blood lead level is 1.8 µg/dL and approximately 30% of children are predicted to have BLLs above 2 µg/dL.

It would be more effective to provide a goal of continuing to reduce the distribution of BLLs in children, by multiple methods including interventions consistent with both CDC's

guidance and with the Healthy People 2010 initiative's recommendations to eliminate BLLs over 10 µg/dL and to test more homes for lead paint (described on page 34). As described below, an effective BLL monitoring program is a critical part of such an effort.

2. Characterization of Washington State blood lead data: In the section on page 32 titled "Lead exposure in Washington is not well characterized" the report presents an argument that the State does not have an adequate childhood blood lead monitoring program in place. Furthermore, the impression is given that there have not been any studies that have characterized the blood lead levels of high risk children in the State. While it is true that there is not a regularly scheduled systematic monitoring program in place, several relevant studies have been conducted in the past that should be reported in this section.

Two WADOH reports, in particular should be cited and summarized in this section: *Washington State Lead Reporting Update: Statewide Childhood Blood Lead Screening Guidelines* (March 2003) and *Childhood Blood Lead Screening Recommendations* (November 2000) both available at <http://www.doh.wa.gov/ehp/Lead/screening.htm>. In particular, this section should include a copy of Table 2 from WADOH (2003) that shows the percent of children with EBLs broken out by age and year including 1993-1995, 1996-198, 1999-2001 and 2002. The value of this table is to illustrate the ongoing trend in reduced percentage of EBLs throughout the 1990s and early 2000s. WADOH (2000) also notes that BLL surveys conducted from 1994 to 1997 in Bellingham, Seattle, Spokane, Tacoma and Yakima were targeted at children living in older housing and children living in poverty, suggesting that these data would be biased high in terms of statewide prevalence of EBLs.

This section should also note that DOH conducted a statewide prevalence survey in 1999 that was targeted at Hispanic children. This survey found a much higher prevalence of EBLs in Hispanic children (consistent with the earlier surveys in 1994-1997), suggesting that this population is at higher risk than other children in the State. These children have been at increased risk due to multiple lead-containing consumer products (e.g., folk remedies containing lead, imported lead-containing candy, canned goods and ceramics). An update on the situation in this population would be especially helpful and would be a useful goal to add to the report.

3. Prevalence of risk factors for Washington children: On page 33, the section titled "Many Washington children have risk factors, but few get blood tests" there is a statement that risk appears to be about average compared to other states. This contrasts with a WDOH (2000) finding that "Data collected by DOH indicate that the prevalence of elevated blood lead levels is very low among the children in Washington State." As documented by WADOH (2000 and 2003), the group with highest prevalence of EBLs has historically been Hispanic children. This finding supports a recommendation to focus future prevalence studies on this known high risk group.

4. Blood lead testing recommendations: On page 212 it is correctly noted that we need to "establish a statistically relevant baseline so high risk populations can be targeted for interventions". However, the goals listed on page 212 and the policy options proposed on page 213 do not adequately capture this goal. In addition to helping identify populations at high risk for EBLs, an important purpose of a monitoring program is to be able to evaluate the effectiveness of intervention programs that are undertaken. This goal should be added to the list of goals on pages 212 and 260.

The policy options described on page 213 do not adequately describe the relative value of the different options, and none of the options are compatible with the goal of establishing a statistically relevant baseline so high risk populations can be targeted for interventions. Consequently, an additional option is needed that is described as:

"Annual or biannual blood lead survey. DOH should conduct an annual or biannual survey of a state-wide statistically representative population of children between the ages of 1 and 7 that includes a completion of a questionnaire designed to identify risk factors. The results of this survey will be used to target intervention efforts and monitor the effectiveness of actions taken."

5. On page *ix*, the word "relatively" should be deleted from the 5th line in the 4th full paragraph, to say "Washington had a large number of young children with risk factors..." Washington does not have higher percentage of children with risk factors compared to other states (as shown on page 33).

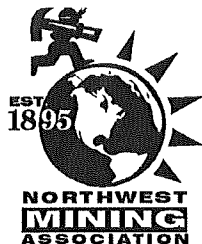
6. On page 11 in the paragraph on natural background concentrations, the sentence starting "Site-wide lead was found at concentrations of 17 ppm..." should be revised to say "State-wide the 90th percentile lead concentration was 17 ppm..."

7. On pages 29 and 30, the tables are missing the headings for the years of the lead levels reported.

Sincerely,



Rosalind A. Schoof, Ph.D., DABT
Principal



Our membership and services span the globe

10 N Post St, Ste 220 | Spokane, WA 99201-0705

Phone: 509.624.1158 | Fax: 509.623.1241

Email: nwma@nwma.org | Web: www.nwma.org

NWMA testimony for the Washington Department of Ecology's Draft Lead Chemical Action Plan (CAP)

The Northwest Mining Association recognizes that lead is a metal of concern, and applauds the effort of the Department of Ecology to address issues related to exposure to lead. The goals of the Lead Chemical Action Plan need to be reasonable, appropriate, and achievable. The draft as currently written is overly ambitious, particularly in light of the current budget crisis in the State of Washington. The Lead CAP should address our most vulnerable population (children) and their primary known source of contamination (lead paint in older homes). This approach would provide the maximum benefit from limited available resources.

Programs to reduce exposure to lead must be based on scientific data, not emotion. Consequently, we are concerned with the definition of elevated blood lead levels in the draft CAP. While it is admirable to want children's blood lead levels below 2 ug/dl, we must recognize that this is an unachievable standard. Lead is and always will be a part of our environment, and to deny that is to partake in the wasteful pursuit of zero. Again, we must focus our efforts where we can achieve the greatest results. NWMA believes that voluntary programs to remove lead paint from older homes and incentives to increase blood lead testing among our most vulnerable populations would be more effective than wide ranging, mandatory and prescriptive regulations. Blood lead testing should result in data that enables us to effectively intervene in the most at-risk populations.

NWMA also is concerned that the discussion of mining in the section entitled "ongoing releases" is incomplete and therefore misleading. Ecology is fully aware that more than 99% of the reported lead releases from mining are to an engineered, triple-lined permitted facility that will be capped and covered; and that therefore those releases are not actually releases to soil, air, or water. It is important that the reader understand the minimal risk the "releases" pose to the human and natural environment. Furthermore, the reader should clearly understand that these releases to land, air, or water are fully permitted by the Department of Ecology. We recommend that this section be re-written to inform the reader of these important facts at the beginning of the discussion of mining on page 138.

NWMA objects to Recommendation 11 that Ecology should evaluate the feasibility of reducing or eliminating mixing zones for permitted facilities. While lead is a metal of concern, it is not a persistent, bioaccumulative and toxic chemical (PBT). The only plausible rationale for eliminating an NPDES mixing zone for lead would be if the science indicated that lead behaved as a PBT in the aquatic ecosystem. A recent peer reviewed "Metals Risk Assessment" by the U.S. EPA confirms quite clearly that lead is not generally bioaccumulative in the aquatic ecosystem. Ecology recognized the validity of the science when it changed its proposed PBT rule in 2006 and decided not to list lead as a PBT. The EPA's Metals Risk Assessment validates that decision. Therefore, a mixing zone ban would be scientifically and economically unjustified. If we truly are attempting to make a difference with our scarce resources, it begs the question regarding mixing zones – who or what is "at risk" here?

Thank you for this opportunity to comment. NWMA will be submitting more detailed comments in writing. We look forward to a final Lead Chemical Action Plan that is focused on human health, particularly children, and is based on a cost benefit analysis to ensure that limited resources are allocated to where they will make the most improvement.



October 6, 2008

Holly Davies
Dept of Ecology
Olympia, WA 98504-7600
Fax: (360) 407-6102
e-mail: hdav461@ecy.wa.gov

RE: Lead CAP

Dear Ms. Davies,

NW PEHSU strongly endorses the proposed Lead CAP. Children are uniquely vulnerable to the effects of lead. The lead CAP recommendations to lower risks for children are supported by peer reviewed medical literature which demonstrates the adverse effects of lead exposure on cognitive development in children and evolving knowledge regarding pathways and sources of exposure.

NW PEHSU supports each of the lead CAP recommendations to reduce risks for children. Increased and updated educational and outreach efforts to both parents and health care providers are key to reducing risks in children. We agree expanded surveillance is needed in Washington to better characterize the scope of the problem and populations at risk. Surveillance strategies highlighted in the Plan to include outreach to high risk groups such as WIC, Head Start and Medicaid-eligible children are sound. We agree funding is needed to ensure local health departments have the resources necessary to conduct environmental investigations and provide case management for children with higher blood lead levels.

Dr. Karr served in the recent expert advisory committee meetings to evaluate existing recommendations for childhood lead screening and management of children with elevated blood lead levels. We bring to your attention the consensus document that came from this July 2008 process convened by the WA State DOH - *Expert Panel Recommendations on Childhood Lead Exposure*. We look forward to continued contribution of our expertise as well as outreach to the health professional communities as this process goes forward.

We strongly endorse the recommendation to identify and remediate lead hazards in rental housing, including funding for these programs.

We also agree efforts to reduce lead hazards in children should focus on high risk populations.

In summary, we applaud the DOE's efforts on the lead CAP, and support the plan's goal to identify, characterize and evaluate uses and releases of lead, and actions to protect human health and the environment.

Sincerely,

Nancy Beaudet MS, CIH

Catherine Karr MD, PhD

Sheela Sathyanarayana MD, MPH

Northwest Pediatric Environmental Health Specialty Unit (PEHSU)
University of Washington 1-877-KID-CHEM
<http://depts.washington.edu/pehsu>
Box 359739 325 9th Avenue Seattle, WA 98104 Tel. 206 744-9380



October 6, 2008

Holly Davies
Carol Kraege
WA Department of Ecology
PO Box 47600
Olympia, WA 98504-7600
Via email: hdav461@ECY.WA.GOV, ckra461@ECY.WA.GOV

RE: Draft Washington State Lead Chemical Action Plan

To Holly and Carol,

We are writing to comment on the *Draft State Lead Chemical Action Plan*.

People For Puget Sound is a nonprofit, citizens' organization whose mission is to protect and restore Puget Sound and the Northwest Straits.

Overall an incredible amount of work has gone into the creation of this draft document. You have really created a "bible" of the lead situation in Washington! In addition, I really appreciate how well you ran the stakeholder advisory committee process.

It does not appear that many of our previous comments were addressed so we are resubmitting them with some additions.

We are concerned that the document limits the priority actions so tightly. I suggest a tiered approach that includes all of the actions (which in general are inclusive) so that they don't get lost by the readers of this document. A table format would probably work well for this. We anticipate that this document will be used for more than 5 years and conditions change and/or new information becomes available that will allow for implementation of actions that are not anticipated today.

We have the following specific comments:

1. Lead Pathways. Page 5. It would be clearer to use TRI data summaries (both for US and for WA) rather than to quote the EPA summary. The reader should understand the total (all pathways) lead release amounts. Air is an important pathway, for example.

MAIN OFFICE	NORTH SOUND	SOUTH SOUND
911 Western Avenue, Suite 580 Seattle, WA 98104 tel • 206.382.7007 fax • 206.382.7006 email • northsound@pugetsound.org	407 Main Street, Suite 201 Mount Vernon, WA 98273 tel • 360.336.1931 fax • 360.336.5422 email • northsound@pugetsound.org	120 East Union Avenue, Suite 204 Olympia, WA 98501 tel • 360.754.9177 fax • 360.534.9371 email • southsound@pugetsound.org

2. Drinking Water. Page 6. It would be helpful if the document could include information about Washington's water systems here, with relation to corrosion, types of pipes and lead issues.
3. Plastics. Page 7. The list of common uses of lead should include its use as a stabilizer of plastics, given the large number of products that have been found to contain lead.
4. Dust. Page 9. To this sentence: "There are releases to air, water and soil at many points in the cycle," I would add dust. This should be included because it is an important component of the cycle that might be poorly understood by most readers. "Soil" doesn't quite convey the situations of lead paint that degrades (or is eroded) into the dust in homes, for example.
5. Products from outside the state. Page 11. This section should include mention of the many products, including toys and vinyl components of clothing and other items, that include contain lead.
6. Lead in lakes. Page 12. The Sediment section should also include information from lakes that was collected by USGS in a special study.
7. Air lead. Page 13. This section should also mention by name and location the other historic smelters in Washington. This section should mention (briefly) the major existing air sources including the cement plants.
8. Lead poisoning. Page 15. This section is confusing. It would be more straight forward to state the existing federal and state levels for lead poisoning and to explain that new emerging evidence is pointing to the lower level of 2. Further, this document should simply refer to lead is levels above a standard or above 10 or 2 µg/dL or "elevated lead levels," rather than using the term "lead poisoning" in the rest of the document.
9. Lead toxicity and exposure pathways referenced. Page 17-25 ff. It would be helpful to include reference from some of the many recent papers about lead toxicity. These important paragraphs/sections in the document are lacking citations. We would be happy to provide these, if needed.
10. Adult exposure. Page 21. This section should include exposure to products as well.
11. Mixing sources and pathways. Page 23. The title of this section: "Currently there are five widespread exposure sources: paint, soil, water, food, and air" mixes sources and pathways. It would be clearer for the reader if this were separated into sources – as the first section – and pathways – as the subsequent section. Sources are paint, products, workplace activities, contaminated soil, food and water. Pathways are direct ingestion (including chewing on products or building materials, eating and drinking), dust ingestion (including hand-mouth pathway), and air inhalation.
12. Precautionary Principle. Page 26. This sentence "However, it is possible that more people may be exposed to lower but still harmful levels of lead from some source other than paint, and that source could be an important focus for some exposure-reduction programs." should be

followed by a statement that reflects the precautionary principle. It is not acceptable to assume that because we don't know, we don't have an obligation to take steps to ensure that products, building materials, air sources, etc are not considered.

13. Blood testing details. Page 26. Not sure how this is helpful in this report. Poor cleaning of the skin would be harmful in many regards and would not be proper protocol.
14. Other states. Page 37. Information in "F. Requirements and Recommendations from States" contains key points and should be highlighted in the executive summary.
15. Lead in animals. Page 40. It would be helpful in the beginning of this section to emphasize the role of lead in replacing calcium in animals. Page 43. It would be helpful to include recent references about lead in venison – in order to demonstrate levels ingested by scavenger species.
16. Ingestion of dust. Page 47. It would be helpful to include the amount of dust ingested by children: 100 mg/day.
17. Smelter air plume footprints. Page 48. If available, a figure should be included that shows the estimated smelter plume areas from smelters in Tacoma, Everett, Northport, and Trail, BC and Harbor Island in Seattle.
18. Area-wide plume. Page 53. It would be helpful to include information about the number of parcels tested to-date and current status of cleanup and testing effort. I know that residential properties have been tested.
19. Use/occurrence of lead in products. Page 73. In the introductory statements about lead, it should be mentioned that it stabilizes plastic and also that it is often found as a contaminant in products.
20. Toys. Page 76-79. Dust exposure is from more than just from the dust adhered to toys. It should also be noted that lead is not an essential component or ingredient of toys.
21. Art supplies. Page 90. Adults, especially artists or art students, are exposed to art supplies. It is incorrect to state that only children are exposed. College and high school students often use materials with little regard for toxicity. Adults attending craft classes are often not informed about the chemicals used.
22. Lead in Vinyl Products. Pages 93-94. "Some concerns have been raised because alternatives to lead are sometimes less easy to use and can cause manufacturing problems." This statement should be clarified as to the lack of ease (are they less flexible?) and cause of manufacturing problems, or else it should be removed. It is not helpful to have general statements without specific problems listed. Also the text should address workers who use imported vinyl in product manufacturing or uses in the US.
23. Wheel weights. Page 121. Resin wheel weights should be included as an alternative.

24. Fireworks. Page 133. Fireworks should be moved to its own section – not included in decorative/hobby section. It is an important problem for wildlife, as well as air quality (humans). Often firework displays are over waterbodies.
25. Ongoing Releases. Page 138 ff. Table IV-13 should be referenced. How do we, the readers, know where these numbers are from? Also, you should include time frame (are these per year?). Did you include the most recent version of the recent Toxics Loading Assessment results for lead – Phase II studies? Ecology’s Phase II wastewater report has much higher lead number. Also, our most recent paper (our Mixing Zone Study) is located on the web at: http://pugetsound.org/programs/policy/toxics/mixing_zones/. Our numbers may be lower than TRI numbers because we were unable to address loads in peak flows.

In addition, this section should describe local impacts. It is not just that we have total loads for Washington State that is a concern but that there are local areas, such as the Duwamish Valley, where there are higher concentrations of lead in the air pathway, due to the concentration of industrial sources in certain areas adjacent to key waterbodies.

It should be noted that tires (65 ppm lead) themselves are a source of lead to the waterbodies. Tires (auto) weigh 25 pounds when new and weigh 20 pounds when used (approximately 5 years). This adds up to a large nonpoint source.

Maps from SEDQUAL should be included that shows areas of Puget Sound (and other areas, if available) where lead is in sediment at levels above sediment management standards. There are a number of locations.

26. Policy Options.

- a. Page 207. In addition to lower lead air standards, we need to look at cumulative impacts of multiple air point sources. Currently, this is not required under existing regulations.
- b. Page 208: Mixing zone regulatory changes should apply to all waterbodies. Persistent chemicals are of concern in the water column as well as in the sediment.
- c. Page 208: Stormwater permits should require Low Impact Development for all new development. This will reduce lead inputs.

Recommendations.

In general, the report’s recommendations do not take a comprehensive long-term view. The Plan should specify what we need to do over the next 20 years. It appears that Ecology focused on actions that could be accomplished in the next few years. This action plan will not be rewritten any time soon. There are not actions for all of the sources. In addition, the report lists a number of policy options (page 202 ff) but these are dropped and not included as recommendations. The policy options could be tiered in terms of timing (high priority to be addressed sooner) but should not be dropped. Also, there should be a statement that it is more cost-effective to prevent the problem than clean it up afterwards. We request that the plan’s recommendations be strengthened so that the goal of the PBT Program - to “reduce and phase-out PBT uses, releases and exposures in Washington” (WAC 173-333-100) – is satisfied.

In addition, we request stronger recommendations that:

- Take action on ammunition and fishing gear in the near future.
- Better protect children from lead in products including evaluation of more products and phasing out unnecessary uses of lead including vinyl and packaging.
- Develop an assistance and technical clearinghouse/institute to help businesses phase out lead
- Require better reporting of use of lead by businesses and industry
- Include a clear goal that children's blood lead level should be 2 ug/dL.
- Include specific actions to protect against lead brought home.
- Require reporting and action for adults with blood levels below 25 ug/dL
- Require assessment of cumulative impacts from facilities that are permitted for air emissions.
-

Performance measures

In general, goals (target % reduction) are not included for many categories. How will we ensure success? In order to make sure that we are making progress, we need good measures to demonstrate that our money has been spent wisely.

Areas where the phrasing might be improved:

- Page viii: "This ~~is the~~ lead chemical action plan (CAP). ~~It~~ was developed by the Washington..."
- Page viii: "The purpose of a CAP is to 1) identify potential harm that could be caused by the substance to the health of humans and wildlife ~~find out what dangers of a substance are~~; 2) ~~where~~ determine sources, pathways and sinks of the substance is found in the environment and; 3) to recommend ways to reduce or prevent harm from the substance.
- Page viii: "In 2007 Ecology completed a multiyear CAP schedule which listed Lead, PAHs, and PFOAs as the highest priority CAPs to conduct by 2009 ~~to identify the next three CAPs.~~"
- Page viii: "Lead is a naturally occurring element that occurs as a bluish-grey metal known for its softness, malleability and corrosion resistance. Historically lead has been used in a wide range of ways since before Greek and Roman times. The first known lead mines are 6,000 years old." ... "Although many uses have been phased out, lead is still found in many products and uses including commercial, boat and industrial paint, also plumbing and fuel."
- Page ix: "~~Consumption~~ Use of lead, both in the U.S. and worldwide, has been increasing and is expected to continue to do so because of growing demand for car batteries and technology." Since you discuss consumption of lead in the sense of food in the previous sentence, the use of "consumption" here might not be the best word choice.
- Page ix: "Lead is also released in large quantities from some products: 600 metric tons from lead shot, 60 metric tons from fishing weights, 40 metric tons from wheel weights, and 27 metric tons from aviation fuel are released annually"
- Page ix: "Most high level adult lead exposure occurs in the workplace"
- Page 2: "The largest producers of lead ore in 2004 are China, Australia, the United States, Peru and Mexico (U.S. Geological Survey 2007b)."
- Page 3: "Sheet lead was used extensively by the Greeks and Romans due to ~~mainly for~~ its ductility and ease of use and the special properties it provided."
- Page 3: (Rosman et al., 19xx)

- Page 3: “In addition, Bindler and his associates studied atmospheric [??] lead levels for a period of approximately 5,000 years using peat cores (Bindler et al. 1999)”
- Page 6: “In one study in Massachusetts, researchers compared four towns with similar water supplies; two towns that treated their water supply for corrosion control and two that did not.”
- Page 7: Should define “leachate.”
- Page 7” “Lead ~~from~~ with the isotopic signature of the lead in the leachate was found in groundwater as far as 1,000 meters downstream from the landfill. ~~and data~~ Analysis of samples collected from as far as 4,600 meters from the landfill indicate possible contamination.
- Page 10: “Lead is also found naturally in trace amounts in resources such as oil, coal and even timber.”
- Page 10: “The primary natural source of lead to the environment in Washington State is from mining activities.”
- Page 11: “If ~~completed~~ opened, lead is expected to be a component in wastewater discharged from the mining operations.”
- Page 11: “In 1994, Ecology conducted a review of background levels of contamination in soil ~~levels~~ for many metals of concern throughout the state.” [also, this natural background level should perhaps be moved up above manmade sources]
- Page 12: “There are approximately 400 listed contaminated soil cleanup sites in Washington where lead exceeds the MTCA cleanup levels of 250 ppm.” [if this is what is meant?]
- Page 16: Policy discussion is mixed with technical/scientific review in the section on blood lead levels. I suggest that this should be separated to a later section.
- Page 18: “Some effects of lead are permanent and continue even after exposure ends”
- Page 20: “~~In the past~~, In the US, prior to the phase out of leaded gas, the largest source of exposure for most children and adults was airborne lead emitted by vehicles that burned leaded gasoline.
- Page 21: “Lead stored in the body can ~~cause exposure~~ continue to be released many years after the initial exposure.”
- Page 27: Should spell out CDC.
- Page 28: Need reference(s).
- Page 32: Would be helpful to include a few examples: “Except for workers in some industries where lead exposure is likely.”
- Page 40: “and a threshold at which there is no effect has not been found...” is a double negative and is challenging to read.
- Page 41: “Known Population level damage to plants from lead is rare, but atmospheric lead may have contributed to the decline of the European spruce forests (Eisler 1988).”
- Page 43: “There is some movement of lead between trophic levels in the food chain,..” or something similar to clarify.
- Page 43: “Organisms tend to store the majority of lead in bones, which are rarely eaten,..” Not true for small fish or organisms.
- Page 43: “~~There is one~~ WA DOH has issued a fish consumption advisory in the Spokane River due to lead from mining practices in the river basin.”
- Page 51: I suggest omitting paragraph starting with “Lead has harmful effects on the environment and people of all ages, ..” as redundant to earlier sections of the document.
- Page 54: “The concentration in the water depends on the ~~quality~~ chemical properties of the water (pH, hardness),...”

- Page 56: “Recently, lead exposure has been ~~seen~~ found in workers involved in recycling telecommunication cables
- Page 94: “Workers at PVC manufacturing faculties and other manufacturing faculties who use PVC.” Etc.
- Page 100: “The primary groups affected are hunters, people who eat game, shooters, military and law enforcement officers, and wildlife, especially scavenger species.”
- Page 142: “According to the 2005 Washington Toxics Release Inventory (TRI) estimates a total of 5628 lbs of lead and lead compounds were released in Washington.”
- Page 142: “TRI data is limited in that they are self-reported estimates (not measurements) of legal lead releases over 100 lbs from certain companies.”
- Page 147: “The first report looked at all of Ecology’s data, but only included matched flow rate and concentration, which resulted in limited number of usable records.”
- Page 148: Typo in title of Figure IV-3
- Page 148: “Releases from products are mostly to soil and dust, but some lead eventually goes into sewage and stormwater water and then sediment.
- Page 204: “To reduce or eliminate the largest legacy source of childhood lead exposure, which is lead-based paint.”

Thank you for the opportunity to comment on the draft plan. Please contact me with questions at (206) 382-7007 X215.

Sincerely,

Heather Trim
Urban Bays and Toxics Program Manager

October 3, 2008

Holly Davies
CAP Developer
Solid Waste & Financial Assistance Program
Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

RE: COMMENTS ON DRAFT LEAD CHEMICAL ACTION PLAN

Dear Ms. Davies:

I am writing to you, on behalf of Public Health – Seattle & King County (PHSKC), to provide input on the Draft Washington State Lead Chemical Action Plan (CAP). PHSKC serves over 1.8 million residents and visitors of King County and strives to protect them from environmental exposures, prevent chronic illnesses and provide access to quality health care.

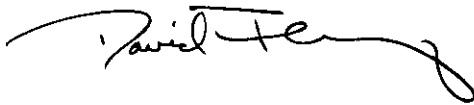
PHSKC supports the following Lead CAP policy positions:

1. The Washington State Department of Health (DOH) Childhood Lead Exposure Advisory Panel recommendations submitted to DOH on June 27, 2008 should be incorporated into the final Lead CAP;
2. Funding for elevated blood lead level (EBLL) case management and environmental investigations should be funded through Medicaid, when appropriate, or other funding mechanisms. Funding for public health activities including EBLL case management is currently inadequate in Washington State;
3. Washington State Department of Early Learning in conjunction with Washington State Department of Community, Trade and Economic Development, Washington State Department of Ecology, DOH, and local health departments should develop guidelines, standards, and protocols for lead hazard evaluation of Child Care programs located in buildings built prior to 1950. Pre-1950 housing stock is known to have a high prevalence of lead. Bans on the use of facilities with lead are unlikely to be tenable and may create social injustices. Efforts should focus on effective risk-based approaches over complete removal of lead from the housing stock;
4. Resources should be developed to provide meaningful follow up actions for medical providers to refer parents of children with BLLs of greater than 5 µg/dL;
5. Development of a Washington State Healthy Housing Program or support for development of local programs. Components of a Healthy Housing Program include, but are not limited to:
 - a. Comprehensive education and assistance to tenants, homeowners, and landlords on lead poisoning prevention; and,

- b. Ability to address other healthy housing issues such as indoor air quality, integrated pest management, cleanability, and chemical concerns of building materials.
- 6. Close the loop between adult EBLLs and coordinating with the exposed adult's family to encourage blood lead testing of the exposed adult's children.

If you have any questions or need more information, please feel free to contact Ngozi Oleru, Environmental Public Health Division Director at ngozi.oleru@kingcounty.gov or Jefferson Ketchel at jefferson.ketchel@kingcounty.gov or (206) 263-8462.

Sincerely,



David Fleming, MD
Director and Health Officer

RENTAL HOUSING ASSOCIATION

ESSENTIAL TO THE WASHINGTON RENTAL HOUSING INDUSTRY

RE: Dept. of Ecology recommendations for its Lead Chemical Action Plan

To Whom It May Concern:

The Rental Housing Association of Puget Sound is concerned about the proposed recommendation regarding remediation of lead hazards in rental housing (4B).

- 1) More than 80 percent of homes built before 1978 contain lead paint, therefore any legislation should include ALL housing not just rental housing. Any home with elevated BLL will continue to be a source of lead for anyone living there it doesn't matter if the home is rented or not.
- 2) Lead based paint that is in good condition is not a hazard. In King and Pierce County the majority of rental housing stock is in good condition. We would request that any type of action required by the rental property owner should only target housing that is found to have a problem.
- 3) Renters are not a vulnerable population. A surprising 40% of Americans living in rental housing do so by choice and not because of their financial situation. For the past four years, households earning \$50,000 or more have been the fastest-growing segment of the rental housing market. America's population is more diverse than ever and as it changes, so do its housing preferences. Millions of established and affluent families are now drawn to rental housing.
- 4) RHA supports expanding public grants provided to homeowners for assessment and remediation to rental property. Over 45% of all housing in the King county area is rental housing. If lead paint is a problem in a household whether the house is owned or rented it still needs to be addressed.
- 5) Rental property owners already have laws regarding lead paint. Rental property owners who own homes built before 1978 have to disclose known information on lead-based paint and lead-based paint hazards before leases take effect. Plus, leases must include a disclosure about lead-based paint.

Thank you for your consideration. We would request to be apart of any workgroups, stakeholder groups, etc. as this moves forward. Rental housing serves people in many phases of life ranging from students to recent graduates to young families to grandparent and provides a community benefit.

Sincerely,

Julie Johnson
President
Direct: 206-905-0611

Dear Ms. Davies:

As president of a conservation and hunting organization, I implore you to carefully and scientifically explore the implications of the "lead" issue. I'm sure you are well aware of the pride hunters take in being the original conservationists; however too often special interest groups ignore sound conservation and misrepresent scientific evidence in order to push through their own agendas. The issues of lead are vast and varied, however when looking at the total picture, at this time banning lead is totally unwarranted. Thank you for allowing me to share my thoughts.

Sincerely,

Deborah J. Barrett, President
Central Washington Chapter
Safari Club International

From: Ken Carpenter
Sent: Thursday, October 02, 2008 8:17:18 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

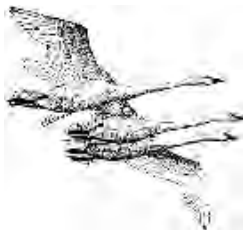
Ms. Davies,

We agree and support the position of Washingtonians for Wildlife Conservation on the "Recommendations to Lower Risk for Wildlife and the Environment" section of the Lead Chemical Action Plan.

Sincerely,

Kenneth D. Carpenter
President
SCI - Inland Empire Chapter
Email: kcarpenter@bcmlaw.com

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Skagit Audubon Society

*PO Box 1101
Mt. Vernon, WA 98273*

October 6, 2008

SENT VIA FACIMILE AND EMAIL

Ms. Holly Davies
Dept of Ecology
P.O. Box 47600
Olympia, WA 98504-7600
Fax: (360) 407-6102

Dear Ms. Davies,

The mission statement of Audubon-Skagit County is *“To conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth’s biological diversity”*.

We are concerned that the draft CAP does not include any recommendations to ban or regulate lead in any type of ammunition beyond the current law.

We all know that lead ammunition and fishing gear contaminates hunting or aquatic areas so that these sites become a danger to animals and humans.

Lead poisoning from ingested lead sinkers used in fishing gear is well observed in many waterfowl and wetlands species. Moreover, hundreds of avian species are mortally harmed by ingesting lead shot.

We in Skagit County have had firsthand evidence regarding the toxic legacy of lead shot ingested by Trumpeter and Tundra swans. The high deposition of lead shot in the Skagit Wildlife Area pheasant release site continues to harm both wildlife and citizens.

Our particular concern is the use of lead shot in target or skeet shooting exercises which we understand is currently beyond the purview of any agency.

Equally depressing is the secondary poisoning we often evidence when animals (including humans), in predator/prey roles ingest portions of species that contained lead shot and/or bullets, or in the case of many raptors, scavenge the carcasses of those already killed by lead poisoning .

Stricter regulations and penalties must ultimately be enacted to counter the rapidly increasing threat to the safety of people and animals. We call on the Department to issue an urgent appeal in its strongest language for the substitution of non-toxic alternatives to lead for use in ammunition and fishing gear.

Sincerely,

Steve Aslanian, Conservation Chair
Skagit Audubon Society



SPORTING ARMS AND AMMUNITION MANUFACTURERS' INSTITUTE, INC.

Since 1926

October 6, 2008

Ms. Holly Davies
Washington Department of Ecology
PO Box 47600
Olympia, WA 98504-7600
Fax: (360) 407-6102
Email: hdav461@ecy.wa.gov

Dear Ms. Davies:

Thank you for the opportunity to comment on the Washington Department of Ecology's (WA DoE) draft Lead Chemical Action Plan (LCAP). The Sporting Arms and Ammunition Manufacturers' Institute (SAAMI) was founded in 1926 at the request of the US government to create standards and promote safety and reliability in the design, manufacturer, transportation, storage and use of firearms, ammunition and components.

This letter is in opposition to the draft LCAP. The draft LCAP is flawed in several significant ways. SAAMI will address these flaws in two broad sections: 1) fundamental flaws in the basic approach, and 2) comments on the specific the sections related to lead in ammunition.

FLAWS IN THE BASIC APPROACH

The most significant fundamental flaw of the draft LCAP is that it tries to combine two separate policy steps into a single action. Specifically, the LCAP as drafted tries to change the currently accepted definition of the threshold for elevated lead levels. Interwoven with this effort is a proposed action plan based on the changes to the current threshold for elevated lead levels.

It is poor public policy to link these two actions. The proper way to progress is to first propose and debate the need to lower the threshold for what is defined as an "elevated lead level." This needs to be a public debate with input from all stakeholders. A quick search on the internet will reveal that not everyone is in agreement on the need for a lower threshold, and even those who do support a lower threshold do not agree with the authors' of the draft LCAP's extreme position that the threshold should be "0." Again, the proper way for the WA DoE to proceed is to have a full and open public debate on this issue alone BEFORE proceeding with the drafting of an LCAP.

Another fundamental flaw is a lack of recognition of best management practices that protect human health and the environment. This is particularly interesting, since WA DoE has been a significant leader in developing BMP's for lead at outdoor shooting ranges and was co-chair of the Interstate Technology and Regulatory Council's team that wrote "Environmental Management at Operating Small Arms Firing Ranges." BMPs for outdoor ranges have developed and written by industry, state environmental agencies (including the ITRC document) and US EPA. Indoor range BMPs have been developed and published in a partnership with industry, OSHA and NIOSH. Industry and the Condor Recovery Team Executive Committee created BMPs for preventing potential Condor lead ingestion from ammunition. Omitting BMPs will result in a myopic and unnecessarily burdensome action plan.

Finally, the draft LCAP irresponsibly proposes alternatives to lead without providing any fate and transport evaluations of these alternatives. As the US Army found in its failed "Green Bullet Program" the alternatives can be worse than lead; and lead can be managed to minimize and prevent harm to human health and the environment.

COMMENTS RELATED TO AMMUNITION

Page xv

The draft LCAP did not reach out and benefit from the extensive knowledge of the shooting sports industry on this subject. This oversight is in contrast to consultation with every other stakeholder group affected. It does beg the question; is the draft LCAP full of errors related to ammunition because the authors did not consult the industry, or did they not consult the industry because the information would have upset pre-conceived plans to recommend banning lead ammunition?

Page 8

Paragraph 5. Lead compounds are NOT used in bullets and shot as stated. Bullets and shot use elemental (metallic) lead. The chemical properties of different forms of lead are vastly different. The soluble organo-lead compounds that are the subject of this paragraph are toxic. Elemental lead is insoluble and generally inert. Other insoluble lead compounds—such as lead phosphates—are similarly inert. All lead is not alike and to lump elemental lead and non-toxic lead compounds together with the toxic organo-lead compounds when formulating action plans is completely misleading and irresponsible.

Page 98

Paragraph 1. The first sentence contains one of the few completely factual statements in the entire section: lead is “resistant to corrosion.” There is no mention that elemental lead is fundamentally different than soluble lead compounds that used to be used in products like paint and gasoline. In order to pose a risk, metallic lead must first corrode into compounds (and it resists corrosion) and some of those compounds must be a soluble form and it must be internalized by an organism. Unless ALL of those conditions exist, there will be no harm.

Paragraph 2. The statement that “Most ammunition now comes in non-lead alternatives is false. There is no alternative to lead for more than 50% of all ammunition sold in the US.

Paragraph 3. Lead styphnate is a moderately soluble lead compound used in the priming mixture. Lead exposure is limited to human inhalation if quantities of ammunition are fired in an enclosed space (like an indoor range) that do not follow proper BMPs. The reference to airbags is irrelevant to ammunition and can only be interpreted as an attempt to inappropriately lead the reader to believe that lead-substitutes are readily available (which is not the case). The reference does not take into account the significant differences in form and function between airbags and ammunition primers. The new silicon-based igniters used in airbags are a technological advancement specific to the use, including integration with electronic components and higher energy output which if used in ammunition would raise pressures beyond safe levels. The misuse of this reference without a full discussion of the real reasons for—and technologies behind—the changes in airbags indicates either an ignorance of the subject by the authors or a deliberate attempt by the authors to carefully select and misuse pieces of information to support a pre-conceived conclusion.

Paragraph 4-9 overview. This section should either simply identify the alternatives on the market, or provide a complete analysis of benefits, disadvantages, and fate and transport of the alternatives. In a recurring theme, the authors pick and choose the information presented in order to support a ban on lead. All information should be presented in a balanced and scientific manner.

Paragraph 4. The information in this paragraph about fishing (two sentences) provides a sharp contrast to how ammunition is handled in the same section.

Paragraph 5. Either provide a simple listing of the alternatives, or provide a full report on advantages and disadvantages. It is improper and irresponsible to pick and choose information.

Paragraph 6. This paragraph is inappropriate—and wrong. It is inappropriate to promote a single manufacturer's product. It is just plain wrong to state that 93% of Arizona hunters switched to non-lead ammunition. This statement is also contradictory to the correct information presented on page 106 *Existing Programs in Arizona*. In Arizona, all hunters who draw tags in the management zones where Condors feed are offered free non-lead ammunition. 40% of those hunters won't use the more expensive non-lead ammunition even when it is given to them for free. 93% of hunters in Arizona do implement best management practices that prevent a potential exposure pathway between ammunition and Condors. Information that may further support widespread hunter rejection of current non-lead ammunition is emerging in California. While the data is anecdotal and can't be confirmed until after the hunting season, in California where lead was banned 50%-70% of the hunters stayed home rather than use the mandated non-lead ammunition. California hunters do not have the option of adopting best management practices. The statement that copper bullets don't fragment is incorrect and contradictory to information presented on radiographs in paragraph 5 of page 101.

Page 99

Paragraph 1. It is important for ALL shooters to practice with the ammunition they will use for hunting, target shooting and/or personal defense—not just military and law enforcement officials.

Paragraph 2. Once again, only the parts of facts that would support a lead ban are presented in the draft. The US Army did create a non-lead round to replace traditional lead ammunition. However, after phase-in they did fate and transport studies and discovered the alternative is far more mobile and toxic than lead. The Army has returned to traditional lead-based ammunition. Further, it is important to note that a 1984 federal law has banned the civilian possession of ammunition with projectile made with certain materials, like tungsten and steel. This federal law bans civilians from possessing the U.S. Army's green bullet.

Paragraph 3. Generally correct. In addition, the lead free primers are not as reliable. As with projectiles, there is a great deal of R&D on lead alternatives but the current technology does not support reliable and cost-effective solutions.

Paragraph 4. There is no evidence that people who eat game are affected by lead fragments. In fact, evidence from many states—including Iowa which does extensive testing of children—shows no indication of any link. The Centers for Disease Control (CDC) is about to publish a comprehensive study that focuses on lead levels as they relate to consuming meat harvested by hunters using traditional ammunition. The preliminary release stated that of nearly 750 people studied, no one had a blood lead level

(BLL) that even approached the most stringent threshold for children. The indoor range exposure risk cited is in direct contradiction to established BMPs. Published studies done by various agencies around the world—including Alaska’s Department of Health study of high school shooting team members and their families—prove implementation of basic BMPs prevent lead exposures at indoor ranges. For more information on indoor range lead management BMPs please refer to the publication developed in partnership between industry, OSHA and NIOSH entitled “Lead Management and OSHA Compliance for Indoor Shooting Ranges.”

Paragraph 6. Metallic lead in the environment does not represent a de facto exposure as stated. This is yet another exaggeration. At best it could be said ...”which adds to the *potential* lead exposure...”

Paragraph 7. Delete the entire paragraph. As stated above, there is no evidence showing a link between consumption of hunter-harvested game and elevated BLLs. The studies referenced were done by members of the Peregrine Fund, an organization whose stated objective is to ban the use of lead ammunition. In a recent conference held by the Fund, their idea of the proper way to implement public policy is to first determine what you want to accomplish and then manipulate the science to support your objective. This is fundamentally wrong and clearly undermines the proven success of science-based wildlife management that was first proposed by Aldo Leopold (who completed his groundbreaking work with a grant from SAAMI).

Page 100

Paragraph 1. Delete the paragraph. The information in this paragraph assumes a large amount of metallic lead creates a de facto risk. This is untrue. There have been many studies of environmental risks at outdoor shooting ranges and the only risks identified in any of these studies were to individual ground squirrels living in the range backstop. There was one case of a military firearms instructor who worked at an outdoor range and had slightly elevated lead levels. This was determined to result from a combination of enclosing the firing line and poor hygiene practices of the individual. Both would be addressed by adopting the simple range BMPs referenced above. At the Skagit wildlife area, lead is present, but again the mere presence of metallic lead does not constitute an exposure, and there is no data to show that lead is posing any risk to wildlife populations. Of even more significance, the lead at Skagit was up to 4” deep. Only the lead above the surface is potentially bioavailable to feeding birds.

Paragraph 2. Once again, the first sentence overstates exposures. It would be more accurate to say “...the major *potential* exposure...” There is a similar overstatement in the second sentence. It should read “Birds may be exposed to lead if they mistake the

pellets for food or grit.” The only studies on incidental ingestion for food were caged doves with lead shot mixed in their feed pan. There is no mention if there was enough food in the pan, or the birds were starved to induce feeding on lead pellets. Even under this forced condition a surprisingly small number of birds ingested pellets. A study by US EPA on a heavily used outdoor shooting range in New York State showed that tons of lead pellets of a size typical of grit were present. However, even in this extremely heavily concentrated area of lead deposition, when compared to the total number of particles of suitable grit material in the same area the pellets presented less than a 2% exposure risk. The suggestion that 115 species have been harmed is untrue. There is even some question as to whether lead poisoning had a species population impact on waterfowl (the draft LCAP understates the role of the Bald Eagle in instituting waterfowl lead bans). These *specie* have not been affected. *Individuals* in these specie may have been affected. There is no evidence of population impacts from incidental ingestion of lead from ammunition.

Paragraph 3. fishing related and not part of this review. However, once again it is glaring in the difference between how fishing tackle is addressed versus how ammunition is addressed.

Paragraph 4 – continuing on Page 101 Paragraph 1. The language is inflammatory, generalized, unscientific and unsubstantiated (such as “lead poisoning **was thought to** account for the deaths of more than one million ducks...”). Moreover, there has already been a ban of lead shot for waterfowl hunting. If you are going to talk about the ban, you should also identify the results of that ban. Interestingly, following the lead ban there have been no population changes beyond the normal fluctuations caused by habitat loss/gain and the annual nesting productivity—largely a result of weather patterns.

Page 101

Paragraph 2. As stated above there have been isolated instances of individuals in different species reportedly being exposed to lead from ammunition. The dove is believed to be most at risk. Some studies indicate there may be an exposure and the Association of Fish and Wildlife Agencies established a working group to look into it. The group concluded there wasn't enough information to draw any conclusions and that more studies needed to be done. Those studies are underway.

Paragraph 3. Secondary poisoning occurs IF predators ingest lead—and if they don't throw off the lead in their cast or move the lead through their system before it can break down and be absorbed. Not all birds that ingest lead become lead poisoned. More evolved scavengers, like the black and turkey vultures, are unaffected by lead. Delete the section on lead poisoning of Golden Eagles by pesticides. The lead in pesticides are

organo-lead compounds, not metallic lead. This is completely irrelevant and shows the length to which the authors will go to “spin” this document to make metallic lead look bad and achieve their pre-conceived goal of a lead ammunition ban.

Paragraph 4. Lead poisoning of Bald Eagles—at the time an endangered species—was the main reason for the waterfowl ban. Bald Eagles are one of the species most susceptible to incidental ingestion of lead pellets and fragments. While individuals of the species may be affected, there are no population impacts and in fact populations continue to rise.

Paragraph 5. Fragments may be present, but again—populations of the most susceptible species continue to rise. Earlier in the report it was convenient to say copper bullets don’t fragment. Now the authors say they do (just not as much as lead bullets). Which is correct?

Pages 102 and 103

The entire Condor section is completely irrelevant. Condors don’t live in Washington. This is another instance of “piling on” with information irrelevant to Washington just to “sell” the idea of a lead ban. The issue of Condors and lead poisoning is complex and nowhere near as clear cut as the Peregrine Fund and anti-hunting groups would have you believe. Following the strategy outlined in their conference of first drawing a conclusion and then fitting science to that conclusion; information inconsistent with a conclusion that lead is coming from ammunition is disregarded or explained away. Even the studies quoted in this report are significantly flawed or the results creatively interpreted.

There is even a question of what constitutes lead poisoning. Without any justification the human levels of lead toxicity have been used as the threshold for determining lead toxicity in Condors. Dead Condors with lead levels of 101 micrograms per deciliter have been classified as having died from lead poisoning while birds with lead levels over 900 micrograms per deciliter have survived (it should be noted that chelating treatment was initiated once the bird was brought in from the wild).

The referenced isotope study also showed half the Condors that died of lead poisoning had isotopes that DID NOT match metallic lead. In a decision that could only be a deliberate attempt to create a self-fulfilling prophecy, the only source of metallic lead tested was ammunition. Other sources, such as jewelry, wine wrappers, toys, bits of solder, etc. etc. were not tested, but would have an identical isotope fingerprint since virtually all domestic products that contain lead—including ammunition—use the same recycled lead. Condors are well-documented for eating trash (referred to in literature as “microtrash”), including metallic objects, yet this is ignored as a potential source of lead.

Further, it is interesting that nearly all cases of lead poisoning in both Arizona and California have occurred during the spring—particularly June. Hunting seasons are in August and September.

This is only the tip of the iceberg on this issue. Again, it is irrelevant to Washington and should not be part of this report. It is important to note, however, the potential for unintended consequences of a myopic lead ban. California license sales in the areas affected by California lead bans have declined by approx 50%. Fewer hunters mean less Pittman-Robertson dollars—millions of dollars taken from wildlife management—and tens of millions of dollars lost to the economies of these rural areas. In the end, the lead bans may prove detrimental to wildlife management.

Page 104

The basic foundations of the calculations are based on clearly faulty information. It is inconceivable that ammunition accounts for 95% of Pittman-Robertson tax revenues. The real number is approximately 34%. This number is readily available from TTB and industry. Claims that the authors did consult with TTB is therefore suspect—and they did not consult with industry.

Page 105.

The report references 94 tons of lead used hunting. The field in Skagit Wildlife Area alone had 6.8 tons. In other words, there are a couple of public land areas with high concentrations. (again, this does not represent a de facto risk). Outside of the public hunting areas, the distribution of lead pellets over the total land mass of hunt-able land in Washington amounts to an undetectable and therefore insignificant number of pellets per acre.

Similarly, the vast majority of lead ammunition is fired at shooting ranges. This lead is contained within a small and well-defined area where it is relatively easy to implement the BMPs that reduce and eliminate risks from lead in spent ammunition.

Page 230

Recommendation #6—Education and Outreach. The education materials and outreach recommended in this section already exist. Materials have already been developed and distributed for lead management at shooting ranges. In addition, SAAMI works with state and federal OSH and environmental agencies to provide training seminars for range

operators. We welcome the opportunity to work with Washington agencies to educate range operators.

Page 232

Recommendation #9—Decrease the Use of Lead in Distributive Products. This is a fairly well-balanced section that clearly identifies there is a significant difference between impacts to individuals of a species and proven population impacts. It also identifies that different approaches be taken for these different situations. But then we get to the real meaning...

Page 251

“Cost for Recommendation #9 to Phase Out Lead Wheel Weights, Shot and Small Fishing Weights” The title says it all. Recommendation #9 did not call for a phase out on the use of lead shot and yet that is what the LCAP is working towards. The estimated costs have to be wrong, in part because the keystone assumption that 95% of all Pittman-Robertson Act tax revenues come from ammunition is so far from accurate (and intuitively off-base) it can only be categorized as a fabrication. The correct information is readily available from TTB and industry. The real number for the most recent year available (2007—although other years have a similar pattern) is approx 34% of P-R tax revenues come from ammunition. Errors of this magnitude are unacceptable in any report—this is not a balanced report that bases recommendations on science, it is a biased report designed to implement pre-conceived goals.

Page 257

Last paragraph *Additional Resources*. If, as stated on page 232, it is not necessary to implement lead ban requirements if there isn't a population impact, then why is there a call for additional actions if the use of lead shot is not reduced? Again, as it relates to ammunition, this document is clearly written with the sole purpose of ending up with a ban on the use of lead ammunition.

Summary

This report is biased and much of the information is irrelevant to Washington. Unlike other stakeholder groups, the shooting sports were not consulted. Science is selectively presented, ignored, and/or misquoted to make the case for a lead ban (as proposed on page 217). Worse, there is an obvious anti-hunting bias as evidenced by the way hunting activities are presented in the section on "Fishing, Hunting and Shooting" and underscored by the goal on page 207: "Prevent wildlife deaths from lead poisoning." Science-based wildlife management is about population management, not protection of individuals in each species. Protection of individual animals is the very essence of the anti-hunting movement.

It is our position that this document should not be published by a public agency. The agency should first engage in a discussion and full dialogue among all constituents to establish the proper threshold of what constitutes an elevated lead level. Following this, the LCAP should be re-drafted by authors who do not have a pre-conceived agenda.

Thank you for the opportunity to comment. It is our firm belief that following the above recommendations would result in a document that WA DoE could be proud of and that many constituents would be able to embrace and support. The current draft LCAP will only result in fueling an anti-hunting agenda that will ultimately undermine the public's confidence in WA DoE and harm science-based wildlife management.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Patterson", with a long horizontal line extending to the right.

Richard Patterson
Managing Director

September 23, 2008

Holly Davies
Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

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Ecology - SWFA - Ind

Dear Ms. Davies:

Thank you for the opportunity to comment on the Draft Lead Chemical Action Plan. It is obvious the Department of Ecology and its partners have researched, discussed, and presented many useful policies to address and prevent lead poisoning in Washington State.

The Tacoma-Pierce County Health Department (TPCHD) has increased its involvement in lead testing and community outreach regarding lead poisoning and is highly supportive of activities that focus on reducing exposure to lead.

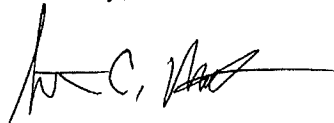
Current data show there are adverse health effects to children with blood lead levels below 10 µg/dL. And, due to the limited number of children tested for lead in Washington, it is unknown how many children have elevated blood lead levels (EBLLs) and which populations are most vulnerable. For these reasons, we support increased lead testing of children, and for children found to have elevated blood lead levels there should be services available to identify likely sources of exposure and assistance to reduce further exposure to lead.

To summarize, the TPCHD supports:

- Increasing the number of children tested for lead in the state
- Conducting follow up with families with children at or above 5 µg/dL
- Developing and implementing a lead poisoning prevention program

Specific recommendations on the Lead CAP are enclosed. Please contact Frank DiBiase with any questions regarding these recommendations at 253 798-7674 or fdibiase@tpchd.org.

Sincerely,



Steve Marek, Senior Public Health Manager
Environmental Health Program

cc: Frank DiBiase, Prevention Coordinator
Lindsay Spencer, Environmental Health Specialist I

Below are the comments, questions and suggestions by the Tacoma-Pierce County Health Department on the Draft Washington State Lead Chemical Action Plan. Comments are focused on Section IV. Policy Options through Section X. Performance Measures.

Each section is broken down by page number, the specified paragraph/section is in bold, followed by the comment/suggestion/question.

Section IV. Policy Options

- Page 205: **Study lead in soil near roads / No Action.** Not sure it's true that private property owners have been reluctant to have their properties tested for lead, but definitely true of childcare providers.
- Page 207: **Ban lead in all products, with a list of exceptions that is periodically reviewed.** Support having the burden of proof on the manufacturer.
- Page 208: The second half of the first sentence is missing the word "lead" – "...but it addresses the products with *lead* that are thought..."
- Page 210: Support having more data that will result in more focused education and outreach.
- Page 211: **Increase BLL testing among Washington children 0-6 / Universal mandatory testing.** Comment / Suggestion – Good idea, if done needs to be coupled with services for those children with EBLs, e.g. home assessments, medical care, etc.
- Page 212: **Targeted mandatory testing – last sentence says "...the CDC does not currently recommend their use (risk factor questionnaires) because they do not identify all the children with EBLs."** This seems like a good reason to not have "targeted" testing, should be explained as to why it makes sense to conduct targeted testing.
- Page 212: Comment –Offer universal testing as a pilot project for minimum of 2 to 3 years to better understand who's impacted by lead in WA State and who our target groups should be.
- Page 212: **Change the definition of EBL.** Keep in mind that the Lead Care II machines purchased by DOH and being used throughout the state and in counties who have purchased their own, can only test to a minimum level of 3.3 µg/dL. If the goal were to identify if children are at or below 2 µg/dL, these machines would be inadequate.
- Page 213: Support the fact that "Local health departments need adequate funding to do environmental investigations for children with higher levels of lead."

Section VII. Recommendations / Priority Actions

- Page 222: **Recommendation #1 a.** Include Local Health Jurisdictions in the list of agencies DOH should work with to increase education and outreach.

- Page 223: **Recommendation #1 b.** Questions / suggestions for the explanatory paragraph – Offer technical assistance? Require use of certified professionals? Require training for do it yourselfers? How about possible risk from exterior work and cross contamination of neighboring properties?
- Page 223: **Recommendation #2 a.** The first two sentences in the first paragraph seem to contradict each other, one saying all children should be screened at one and two years of age and the next that it is a discussion between the parent and medical care provider.
- Page 223: **Recommendation #2 a. last paragraph on the page.** Good idea to amend the Certificate of Immunization Status for a child to be enrolled in pre-school or elementary school.
- Page 224: **Recommendation #2 b. DOH should identify *high risk populations* to prioritize efforts.** Question – Is this based on increased testing? Statement – Should collaborate / coordinate testing events to increase the number of children tested.
- Page 224: **Recommendation #2 d.** Suggestions – (1) First sentence should read “Parents of children determined to be at high risk should be strongly encouraged to *have* their children tested.” (2) Requirement for all children 0-6 years old in foster care.
- Page 224: **Recommendation #2 e.** Very supportive of this recommendation.
- Page 225: **Recommendation #3, second paragraph.** Suggestion – Define “higher levels of lead” for families who would need environmental investigations by LHJ.
- Page 226: **Recommendation #3 b.** Include children placed in foster care. In all likelihood this would then require assistance from the state to conduct remediation or could result in the negative consequence of the loss of eligible/willing foster families.
- Page 228: **Recommendation #4 c.** Seek delegation and adopt WA standards that make the rule consistent with intent of the Lead CAP.
- Page 228: **Recommendation #4 d. last sentence in paragraph.** “...as the agency that licenses child cares, *should* require the evaluation...”
- Page 228: **Recommendation #5.** Are steps for clean up sufficient? Should properties with elevated lead levels in soil take priority regarding clean up actions? e.g. they would go to the top of the list of confirmed or suspected contaminated sites.
- Page 230: **Recommendation #6.** Support outreach materials addressing take home lead exposure issues.
- Page 230: **Recommendation #7.** Good recommendation.

- Page 231: **Recommendation #8 a. explanatory paragraph.** Add something regarding EBLs in workers triggers testing of children in the household or under the care of the worker.

Section VII. Economic Analysis of Lead Exposure

- Page 236: **Blood Lead Level Testing.** Since there is not a recommendation for mandatory universal testing, lead testing should be offered to parents as a yes/no offer by their medical care provider with some additional reasons why or why not their child should be tested.

Section IX. Implementation Steps

- Page 257: **Additional Resources.** Include resources for Local Health Jurisdictions.

Section X. Performance Measures

- Page 259: **Blood lead monitoring goal #1.** What are the milestone numbers based on? The first milestone is to test 5% of the children by 2010 – What is the current rate for children 0-6 years of age in Washington state?
- Page 259: **Blood lead monitoring goal #2 “Find and help all children with elevated levels of lead in WA State”.** Wouldn't this mean that all kids, not 10% or 5%, are tested? What help will be given to children in non-rental properties?
- Page 259: **Blood lead monitoring goal #3.** What is the median BLL for children now? Shouldn't this include a declining rate to a certain end point? e.g. not more than 5%?



Ms. Holly Davies
Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600
Fax: (360) 407-6102
e-mail: hdav461@ecy.wa.gov

October 6th, 2008

RE: Comments on Washington State Lead Chemical Action Plan (CAP) Public Review Draft

Dear Ms. Davies:

The following comments are submitted on behalf of The Lands Council (TLC). The Lands Council is a Spokane-based non-profit organization dedicated to preserving and revitalizing our Inland Northwest forests, water, and wildlife through advocacy, education, effective action, and community engagement. We collaborate with a diverse range of partners and work hard to seek smart and mutually-respectful solutions to environment and health issues. Our Environmental Health program is committed to protecting people's health and cleaning up our environment.

Since the mid-1990's, The Lands Council has been involved in cleaning up a legacy of waste from a century of mining in North Idaho and advocating for people's health. Our "Get the Lead Out" program pushed for cleanup of lead and other heavy metals in the Coeur d'Alene-Spokane Watershed. We also advocated for increased testing of children for lead exposure. In 2000, health advisories were issued on the Washington State side of the Spokane River, warning women and children to avoid playing on certain beaches because of lead in the soils. Since 2004, The Lands Council, through a grant from the WA State Department of Ecology, has done direct outreach to people who use the river most often (low-income and recent immigrant residents), helping to protect them from lead poisoning and involving them in the cleanup process.

Throughout the last decade, we have realized that lead exposure comes from many different sources – contaminated beaches on the Spokane River, contaminated industrial sites, lead-based paint in the home and in toys, residual deposits from past use of leaded gasoline and lead arsenate pesticides, and lead found in drinking water pipes. In order to truly protect children—the segment of society most at-risk from multiple exposures to lead—The Lands Council, through a 2-year Targeted Lead Grant from the EPA, is (1) educating high-risk families about the health effects, symptoms, exposure pathways, and prevention of childhood lead poisoning; (2) offering free, voluntary on-the-spot blood lead testing of children ages 0-6 (using LeadCare II); and (3) creating a sustainable, collaborative community partnership to reduce childhood lead poisoning in Spokane. Our project dovetails with The Lands Council's work over the last decade to clean up the Spokane-Coeur d'Alene Watershed from a century of mining and protect the health of those most affected by exposure to lead. Projects such as ours are playing a major role in meeting the federal goal of eliminating childhood lead poisoning as a major public health concern by 2010.

25 W. Main Ave., Ste. 222 Spokane, WA 99201, Tel. (509) 838-4912, Fax (509) 838-5155, <http://www.landscouncil.org>

We agree wholeheartedly that an effective program to reduce exposure to lead must employ several different approaches, including public education and outreach, prevention strategies, intervention strategies, blood lead testing, environmental testing, removal of existing exposure sources, and reduction of new exposure sources.

Our comments focus primarily on the recommendations to lower risk for children, as well as recommendations to lower risk for wildlife and the environment.

Recommendations to lower risk for children

Recommendation #1: Raise awareness through education and outreach. We agree that outreach and education about lead hazards, the importance of childhood lead screening, and means of reducing exposure should be increased. We also support the development of guidelines empowering homeowners, landlords, and tenants (especially vulnerable populations) to assess their own homes for lead-based paint, lead in soil, and lead in water. *We especially feel that awareness must be raised in the medical community, and strongly urge DOH and Ecology to implement a health care provider outreach and awareness campaign on the need for (routine) blood lead screening and testing for, at the very least, kids who are at high-risk for childhood lead poisoning.* Present public perception is that childhood lead poisoning is a disease of the 1970's. Yet, in 2005, the Washington State Study on Lead Hazards in Housing classified much of Spokane as "Priority1," a ranking which represents neighborhoods having the highest concentration of risk factors for childhood lead poisoning, such as older homes and low to moderate median household incomes. As mentioned above, numerous exposure pathways exist in Spokane (e.g. contaminated beaches on the Spokane River, contaminated industrial sites, lead-based paint in the home and in toys, residual deposits from past use of leaded gasoline and lead arsenate pesticides, and lead found in drinking water pipes). Given Spokane's ranking and host of risk factors, we would like childhood lead poisoning to be more present in mainstream public consciousness, and especially on the radar screen of local health care providers.

It is of utmost importance to ensure that those who need and would benefit most from information about childhood lead poisoning (e.g. high-risk families) receive it. We use, and would recommend, the following model. First, we identify Spokane neighborhoods thought to be "high-risk" for childhood lead poisoning by compiling data on age of housing stock, median household income, families in poverty, and presence of kids 6 and under into GIS (Geographic Information Systems) software and producing detailed, color-coded maps (please see attached). We distribute these neighborhood maps to individual households, at neighborhood council meetings, and at Head Start/Early Head Start and other community presentations to show community members the risks of elevated blood lead levels in children associated with where they live. We also post these neighborhood maps on our web site and share them with community partners.

More importantly, however, these maps indicate specific sections of neighborhoods throughout Spokane which have the highest concentration of risk factors for childhood lead poisoning. This allows us to go door-to-door during the spring and summer months, passing along information about childhood lead poisoning to families, answering questions, and advertising upcoming blood lead testing events. To accomplish this, the maps are further broken down into large-scale, numbered street-level "block groups," with street names and house delineations (please see attached). Generally, we spend approximately two weeks covering as many block groups as possible in an assigned neighborhood. When possible, we engage in conversation with families; if nobody is home, we leave educational packets. We then conclude with a free blood lead testing event at the local community center. In addition to passing along information on the health effects, exposure pathways, and prevention of childhood lead poisoning, we assist families in accessing home lead abatement resources and free/low cost health care providers, and advertise aforementioned upcoming Lands Council blood lead testing events.

Maps are updated over the course of the project, and data from both door-to-door outreach activities (e.g. direct contacts, number of educational packets distributed, conversations with families, etc.) as well as data from blood lead testing events are entered into GIS software.

Recommendation #2: Increase risk factor screening, BLL testing and reporting. Despite risk factors, little to no blood lead testing—particularly of high-risk kids—is being accomplished in Spokane. Getting kids tested for lead poisoning is one of the first—and best—steps toward prevention. While the American Academy of Pediatrics’ policy of testing blood lead levels of *all* children in the U.S. at least once is ideal, *we recommend, at a minimum, universal mandatory screening and targeted mandatory testing.* This testing should be done at age 12 and 24 months. Screening and testing for BLL could be added to immunization forms and required for all children to register for pre-school or day care programs as appropriate. If there is any uncertainty regarding presence of one or more risk factors, the precautionary principle should be taken and a blood lead test should be performed. Costs of testing are partially covered by Medicaid and private insurance, and, according to the Lead CAP, remaining costs are not large.

Again, we recommend our GIS-based approach outlined above to identify high-risk populations in order to prioritize blood lead testing efforts. We have had much success working with Head Start and Early Head Start programs on outreach and blood lead testing, and agree that these and similar programs (e.g. WIC) should be tapped to the fullest extent.

We also strongly urge the State of Washington to follow federal Medicaid law, which requires that all Medicaid-eligible children be tested for lead poisoning at 12 and 24 months of age as part of the early and periodic screening, diagnosis, and treatment (EPSDT) requirement. According to estimates from the National Health and Nutrition Examination Survey (NHANES, 1991-1994), Medicaid enrollees accounted for 83% of U.S. children aged 1-5 years who had BLLs >20 µg/dL. We feel very strongly that it is *not enough* to recommend that Medicaid-eligible kids “should be screened” for lead exposure risk factors at 12 and 24 months of age, or that parents of high-risk kids “should be strongly encouraged to allow their children to be tested.” Following federal Medicaid guidelines is an excellent way to ensure that high-risk kids are being attended to and to improve BLL testing rates.

As the Lead CAP suggests, coordination between DSHS, DOH, local health agencies, physician/nurse organizations, and health care providers will be absolutely essential in promoting increased screening for lead exposure risk factors and blood lead testing.

Recommendation #3: Intervene to lower EBLLs. We strongly support the proposal to convene an expert advisory committee to evaluate recommendations on guidelines for screening and testing, as well as appropriate actions for different BLLs. We are also in favor of the Lead CAP’s suggested new guidelines (page 226). To date, of the 214 children we have tested, 20 exhibited “elevated blood lead levels” ($\geq 3.3^* \mu\text{g/dL}$ and $<10 \mu\text{g/dL}$), while one child actually had “blood lead poisoning” ($>10 \mu\text{g/dL}$). Because of current CDC guidelines, no official action was taken on behalf of the 20 kids exhibiting elevated blood lead levels. Yet, recent studies have demonstrated that adverse health effects occur in children with blood lead levels less than 10 µg/dL (and even as low as 2 µg/dL). Similarly, it has been shown that lead is a known human and animal poison with no beneficial biological function. There is no safe level of lead in the human body, and action guidelines should reflect this.

(*LeadCare II only detects blood lead level to 3.3 µg/dL; therefore the 20 elevated blood lead levels we found could likely be an underestimate.)

We also agree that Ecology should propose legislation to require remediation of lead hazards in rental housing if it is a confirmed source of an elevated blood lead level.

Recommendation #4: Primary prevention for lead-based paint hazards. In regards to a pilot program initiated by CTED and DOH to target high-risk areas, increase BLL testing, and assist in housing assessment and remediation of lead hazards: again, we would refer you to our model described above.

Note that we work very closely with the City of Spokane's Lead Safe Spokane program (administered by Kiemle and Hagood), as well as the Spokane Neighborhood Action Programs (SNAP) on issues concerning lead hazards in housing. As an example, we recently found an elevated blood lead level at one of our local blood lead testing events. We referred the family to Lead Safe Spokane, who arranged for an immediate lead hazard housing assessment. Increased blood lead testing by TLC has resulted in increased interest in Lead Safe Spokane, which has, in turn, increased interest in our blood lead testing events, forming a sort of positive feedback loop. Our partnership models how different agencies and organizations can complement each other to be more successful and effective together rather than alone.

We agree that current federal and state requirements for disclosure of known lead-based paint at new tenancy are grossly inadequate to address lead hazards and protect human health, and support mandatory assessment for the presence of lead-based paint and other lead hazards for all rental units.

Recommendations to lower risk for wildlife and the environment

Recommendation #9: Decrease the use of lead in distributive products. Ecology should decrease (and even ban) the use of lead in wheel weights, fishing tackle, and shotgun shot to the maximum extent possible in order to lower risk for wildlife and the environment.

Recommendation #10: Ecology should continue to use existing programs in an ongoing effort to reduce lead uses and releases. The Lead CAP states that over 95% of car batteries are recycled. Where does the lead which is potentially released from the remaining 5% go? Does it get released into our air, or into landfills? Also, do regular alkaline batteries contain lead? If so, where does the lead migrate after their disposal with ordinary household waste? As a general rule, we encourage reducing use of lead in the products listed in this section (which reduces overall lead in circulation), and improving recycling rates.

Thank you very much for considering our comments. I would encourage you to visit our web site at http://www.landscouncil.org/water/reducing_lead.asp. If you have any questions, please feel free to contact me at (509) 209-2403.

Sincerely,

A handwritten signature in black ink that reads "Kat Hall". The signature is written in a cursive, slightly stylized font.

Kat Hall
Environmental Health Program Director

Tri-Cities Metallic Silhouette Association
P. O. Box 4587
Pasco, WA 99302-4587
October 6, 2008

Washington State Department of Ecology
P. O. Box 47600
Olympia, WA 98504-7600

ATT; Ms Holly Davies

Subject: Lead Chemical Action Plan (CAP)

The Tri-Cities Metallic Silhouette Association (TCMSA) is a not for profit organization established to provide a safe location and facilities for the shooting hobby and sport. Our current active membership is 306, mainly residing in or near the Tri-Cities, Richland, Kennewick, and Pasco, Washington.

TCMSA members and I have reviewed the Department of Ecology (Ecology) subject Draft plan. We believe that lead metal is not a current, nor impending serious public health problem. The current ban for hunting waterfowl with lead shot is more than adequate to significantly prevent birds from ingesting spent lead shot. The results also include protecting birds of prey and others from harm should they eat the flesh of a bird that is ill or has died due to lead ingestion.* Note: birds that die from lead ingestion are a potential threat to scavenging animals. However, Ecology implies that a bird killed or crippled directly by lead ammunition is a threat to a scavenger, which is not factual. We conclude the subject plan, if implemented as currently drafted, is unnecessary. The benefits to public health and wildlife would be negligible. Further it includes stipulations that mandate substantial lead reduction use for firearms ammunition. Accordingly, the CAP is a subjective and incorrect effort to punish the shooting hobby and sports, including proper and legal hunting in Washington State. We are in opposition for Ecology to propose the subject current draft plan to the Washington State Legislature during the upcoming session.

First the use of "chemical" is for emotional impact only. The plan only recommends physical efforts, no chemical remediation. Lead is a stable non corrosive metal. It will quickly develop a tarnish coat that protects it from further prolonged aging oxidation. Lead must be exposed to acid to chemically replace hydrogen and form lead compounds. Iron (a moderately corrosive metal) will replace hydrogen in hot water (also in acid). Practically, lead is insoluble, not corrosive, and will not combine readily into poisonous compounds. Lead melting temperature is 327.5° C, and the vapors in poorly ventilate spaces are harmful. In the past, poisonous lead compounds have been industrially used (including lead chromate paint pigment). Now, these are strictly regulated in the USA and elsewhere to avoid and minimize human and environmental exposure. The Ecology plan does not recognize this.

* Steel and other lead replacement shot have reduced ballistics, and deform very little on impact with birds. Thus, the well established and known consequence or result of the lead shot ban is that significant waterfowl are only crippled by steel shot (and die later). The crippled birds exceed the previous numbers harmed by lead ingestion. Ecology does not include this information in the draft plan.

Ecology recognizes abundant car (lead acid) batteries, but is not recommending reductions. This appears acceptable. Lead sulfate accumulates on the battery plates (re: American Heritage Dictionary). It could be a harmful compound, but it is not classed poisonous. If this were a serious public health problem, it certainly would be well known today. Further exposure to lead metal has not caused serious public health decline. Blood levels are typically clearly not serious.

The Ecology plan would increase the cost of and could certainly limit the availability of hobby, sport, and hunting ammunition. The shooting hobby, sports, and proper hunting are worthwhile, safe, healthy, mostly outdoor activities for men and women, young and senior. Good sportsmen are good and productive citizens. Shooting sports and hunting contribute significant, possibly the most, funds necessary for increasing and maintaining wildlife habitat, and for increasing wildlife populations. This is for all wildlife, not limited to game species for hunting.

Sincerely,

A handwritten signature in black ink, appearing to read "Ray Vollert", with a long, sweeping horizontal line extending to the right.

F. Ray Vollert
President



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

Mailing Address: 600 Capitol Way N • Olympia, WA 98501-1091 • (360) 902-2200, TDD (360) 902-2207
Main Office Location: Natural Resources Building • 1111 Washington Street SE • Olympia, WA

September 26, 2008

Holly Davies
Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Subject: WDFW Comments, 2008 Draft Lead Chemical Action Plan

Dear Ms. Davies,

Washington Department of Fish and Wildlife (WDFW) appreciates the opportunity to provide comments on the draft Washington State Lead Chemical Action Plan (CAP). We also appreciate the report's priority for protection of children and other vulnerable populations, from known health impacts of lead exposure. Our comments are specific, though, to CAP sections dealing with fish and wildlife concerns and reflect WDFW's mandate to "...preserve, protect, perpetuate, and manage the wildlife and food fish, game fish, and shellfish in state waters and offshore waters"(RCW 77.04.012).

As you are aware, restrictions on the use of lead in hunting, fishing, and shooting are controversial and require public outreach and partnership to be successful. WDFW, as the CAP fairly represents, does not regulate all related uses of lead. Consistent with agency authority, however, we have restricted the use of lead shot for hunting of waterfowl, coot, and snipe. In addition, we have placed broader restrictions on lead shot uses in specific wildlife areas on a case-by-case basis, primarily for the protection of waterfowl and other wildlife populations in high use problem areas. In these wildlife areas that also include WDFW property ownership, we have appropriately extended the requirement for non-toxic shot to all uses.

We support the CAP's emphasis on public education, outreach, and its encouragement of voluntary actions and partnerships as a key component for fish and wildlife protection. For lead shot, our waterfowl and upland game hunting pamphlet, for instance, points out concerns for shot ingestion by wildlife and recommends that shooters consider switching to nontoxic shot for all uses (including target shooting). With fishing, our staff has worked with U.S. Fish and Wildlife and others to distribute educational flyers to fisherman at several lakes in NE Washington. The flyers talk about the dangers that small lead tackle ingestion poses for loons, and alternatives to lead that are available. As a precaution, we have also discontinued the use of lead sinkers and are phasing out other leaded tackle in all of our "kids fishing" educational events.

Specific comments by page and section follow:

Pg. 257-258. IX. Implementation Steps.

Pg. 257. Education and Outreach. Last sentence. We suggest adding "*fishing tackle and ammunition industry representatives*" to the contacts list. {Comment: These industries must be a part of any discussion, solution, or planned action involving their products. If alternative products are not practical, readily available, and distributed at a reasonable price, their acceptance and use will be low.}

Pg. 257. New Regulatory Actions. {Comment: We understand Recommendation #9's implementation for fishing and hunting to be based on outreach, education, and voluntary actions within current law. As such, it does not fit in this section.}

Pg. 259-260. Performance Measures. Reduce Risks to Wildlife and the Environment.

Pg. 259. Environmental Monitoring. (1st Goal) We suggest changing to read:
Goal: Reduce and eliminate threats to *wildlife and* the environment from consumer products that are a source of lead exposure during use
Milestone: Outreach program to sportsmen *and others* completed {Comment: Per the "Education and Outreach" comment above, industry representatives should be included; there are other shooting interests, as well.}

Pg. 260. Top of page (2nd Goal), We suggest deleting.

~~Goal: to prevent wildlife deaths from lead poisoning.~~

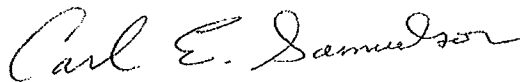
~~Measure: Number of lead swans due to lead poisoning each year.~~ {Comment:

We suggest that swan mortalities are related, primarily, to legacy accumulations, not to current legal uses of lead shot for hunting. We recommend moving this "Measure" to the "past uses goal", below.}

Pg. 260. Bottom of page (3rd Goal). Per above, add: *Measure: Number of dead swans due to lead poisoning each year.*

Again, thank you for the opportunity to provide review. We hope that these comments are helpful and look forward to working with you on this subject.

Sincerely,



Carl E. Samuelson
Water and Habitat Policy
Intergovernmental Resources Management

October 6, 2008

Holly Davies
Dept of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Dear Ms. Davies:

Thank you for the opportunity to provide comments on the *Washington State Lead Chemical Action Plan (Public Review Draft) 2008* Department of Ecology Publication No. 08-07-009. It is apparent that considerable time and work went into the research and development of this comprehensive publication.

The Department of Labor and Industries, Division of Occupational Safety and Health (DOSH) is providing a few general comments as well as the specific comments listed below in table format. Additionally, we have provided a copy of the report with our recommendations embedded in the report document.

The Department regulates many industries and toxic industrial materials including lead. Our current occupational health standards for lead are identical to OSHA regulations. OSHA recently published an updated directive as a National Emphasis Program (NEP) regarding occupational exposure to lead. In this program, OSHA emphasizes directing resources to work places identified with serious occupational lead exposures. DOSH plans to conduct inspection activities consistent with the guidelines provided in the federal program, using our current staffing levels. Pursuing additional activities as outlined in the Chemical Action Plan report would require additional staff and funding to be approved by the Legislature. Currently, we do not plan to redirect resources away from other areas of health and safety within our jurisdiction to complete the recommended activities that are outlined in this report.

DOSH has also prepared specific comments outlined in the table below and in the attached electronic report using comment fields.

Comments LEAD CAP report		
Page	Text	L&I Response
Summary xi	Occupational exposures are often missed because workers who deal with lead on the job are often not properly tested for blood lead by employers.	L&I disagrees with this approach and maintains that direct evaluation of exposures in a workplace using proven monitoring and evaluation techniques along with exposure controls can successfully identify and mitigate harmful worker exposures in a timely manner without requiring invasive blood monitoring procedures. Washington

		employers are currently covered by a regulation that requires assessment of lead exposures and mandates blood lead monitoring under specified circumstances. In contrast, blood lead evaluation by itself cannot successfully address exposure prevention.
Summary xii	Survey statewide businesses to identify current uses and potential occupational exposures. The results will help us update the occupational standards for workers.	Our experience at L&I is that surveys require a lot of resources and often are ineffective. Currently, DOSH has a formal process for the identification of employers who use and potentially have employees exposed to lead. In addition, Federal OSHA recently provided updated information on affected industries with potentially high risk occupational lead exposures. We believe our current information is sufficient to identify these affected workplaces, and that completing a statewide survey would not provide significant additional information.
Summary xii	Modify medical removal levels for workers to reflect our understanding of lead's health effects.	This would require a lengthy rule making process which potentially could be litigious. Major rule making also would require a small business economic analysis. An interim step may be to reconcile L&I's general industry and construction industry lead standards.
Summary xvii	Cheryl Christain	Correct spelling Cheryl Christian
147	WAC 296-24	Correct reference. Delete "24"
155	<ol style="list-style-type: none"> 1. It requires more consistent blood sampling; every two months for the first six months after exposure and every six months thereafter. 2. Work practice measures must ensure that all surfaces be kept dust-free. 3. Workers welding on spots with lead paint must be tested for elevated blood lead levels. 	<ol style="list-style-type: none"> 1. Missing the requirement for initial BLL test. 2. "Dust free" is not accurate. The rules require that "All surfaces shall be maintained as free as practicable of accumulations of lead." 3. This sentence is not a specific requirement of the standard. Delete this sentence.

167	The general occupational health standards are contingent on air testing.	Delete sentence. Not all requirements are contingent on air sampling, e.g. housekeeping which is a critical part of reducing lead exposure in the workplace.
217	Update guidelines for lead exposed workers.	<p>We believe this is intended to mean our regulations. Delete “guidelines” and instead insert “Update Occupational Lead Regulations.”</p> <p>This recommendation would require a major rule making change including an economic analysis.</p>
217	Harmonize and update the lead standards for general industry and construction.	This recommendation would require a major rule making change including an economic analysis, but is a desirable goal.
217	<p>L&I should conduct a statewide survey on occupational use and exposure to lead. The survey would help L&I target as yet unidentified lead-exposed workers. The survey should assess compliance with current regulations in known industries, identify new industries with lead exposures, and identify vulnerable worker populations. Studies in Washington and other states have documented that many companies do not conduct air lead- or blood lead testing even though they are required to do so under state and federal worker protection laws. Since many lead-exposed workers do not receive blood lead testing, lead exposure is likely more widespread than is indicated by Washington’s Occupational Lead Exposure Registry. New and emerging industries and occupations have been found to have high lead exposure, such as telecommunication cable recycling. The survey would also solicit interest in receiving health & safety assistance. Follow-up visits would provide voluntary blood lead testing for workers and technical assistance. L&I would continue to encourage lead-using</p>	<p>Federal OSHA has recently identified additional and updated industries with potentially high risk occupational lead exposures. DOSH will use the National Emphasis Program directive to update statewide programmed compliance inspection lists.</p> <p>Completing any of the recommendations in this paragraph will require additional staffing and resources. We recommend deleting the recommendation.</p>

	employers to use the services of health and safety professionals to address potential lead exposures.	
219	Recommendation # 6 Conduct a statewide survey on occupational use and exposure to lead	<p>Currently, DOSH has a formal process for the identification of employers who use and potentially have employees exposed to lead.</p> <p>In addition, Federal OSHA recently provided updated information of affected industries with potentially high risk occupational lead exposures. We believe current information is sufficient to identify these affected workplaces, and that completing a statewide survey would not provide significant additional information.</p> <p>Completing any of the recommendations in this paragraph will require additional staffing and resources. L&I recommends deleting this item.</p>
219	Recommendation # 7 Harmonize and update occupational standards	<p>This recommendation would require a major rule making change including an economic analysis. While a good goal, this recommendation would take considerable time to accomplish and would not be accorded a higher priority than other rules related projects already initiated.</p>

Again we appreciate the opportunity to provide you with our comments. If you have any questions regarding the information provided, please contact Cheryl Christian, Industrial Hygienist at (360) 902-5732.

Sincerely,

Stephen M. Cant, CIH
Assistant Director

cc: Bruce Zeller
John Furman
Cheryl Christian

Holly Davies, PhD
Chemical Action Plan Developer
SWFAP/ Industrial
WA Department of Ecology
PO Box 47600
Olympia, WA 98504-7600
Phone: 360.407.7398

Comments on the Washington State Lead Chemical Action Plan,
Department of Ecology Publication No. 08-07-009,
Public Review Draft, 2008

Submitted by Washington Physicians for Social Responsibility
October 6, 2008

Dear Dr. Davies,

Thank you very much for your work on Draft Lead Chemical Action Plan. We extend a thank you as well to the Departments of Ecology and Health for their work on the Draft Lead CAP. We also appreciate the opportunity for public comment, and the facilitation of public comment through accessibility of the draft via Ecology's web pages and acceptance of comments via email.

Washington Physicians for Social Responsibility (WPSR) is a non-profit organization based in Seattle with physician, other health professionals, and concerned citizen members throughout Washington State. Our goal is to create a healthy, peaceful world through healthy solutions to the gravest threats to human and environmental health. WPSR's Environment and Human Health Committee strives to create a healthy world for all by eliminating exposures to toxic chemicals. We especially focus on safeguarding children's health, learning potential, and futures. WPSR is also the Washington State chapter of the national organization, Physicians for Social Responsibility, which also addresses issues of children's health and toxic degradation.

In the interests of disclosure, Dr. Steven G. Gilbert and Karen Bowman, MN, RN, COHN-S, serve on the Lead CAP External Advisory Committee as representatives in their professional capacities; they are also Vice President and member of the Board of Directors of WPSR, respectively. Dr. Gilbert co-chairs WPSR's E&HH Committee with Richard Grady, MD, a pediatric urologist.

Children are our most vulnerable population to harmful exposures. **Current science indicates there is no safe level of lead exposure, mandating that we eliminate sources of lead as a necessary step in reducing the possibilities of harmful exposures with permanent neurodevelopmental impacts and other threats to child health, learning, behavior and development.**

Our comments on the Draft Lead CAP include the following themes and recommendations:

1. We commend Washington State for its leadership on persistent bioaccumulative toxic chemicals and for the preparation of this Draft Lead CAP and **urge the Lead CAP to incorporate additional recommendations for policy actions.**

2. We commend state agencies for documenting and quantifying the uses and exposures to lead while pursuing a comprehensive approach to reducing lead exposures and **urge inclusion of a recommendation that childrens' blood lead level should be a maximum of 2 µg/dl. .**

3. We commend the recommendation to increase and encourage **testing for blood lead levels** in children and note that a current project of a Washington State non-profit organization uses the particular approach recommended.

4. **Specificity should be added to at least one Performance measure** regarding lead levels in Category 4 and 5 water bodies.

5. Take-Home Exposures:

An often overlooked yet significant source of lead exposure for young children are take-home exposures produced by parents who work in industries where they are exposed to lead. To address this exposure pathway, monitoring should be undertaken and adults with blood lead levels of >10 µg/dL should be addressed.

6. Reducing Exposures by Reducing Lead in Products

We urge the Lead CAP to include actions to eliminate lead shot, lead bullets and lead fishing gear. Lead in these products can result in sources of lead exposure for children, Viable alternatives currently exist. Phasing out the use of lead hunting and fishing products is essential for human and environmental health.

7. Lead Emissions and Facilities

We urge the Lead CAP to address the cumulative lead emissions from facilities that are permitted for air emissions. The total volume of lead emissions needs to be addressed to address the problem of air emissions.

8. Expansion of Cost Factors to Address Additional Impacts

We urge inclusion of expanded cost factors for other neurodevelopmental, behavioral and health impacts including costs of lead exposures related to links between crime and behavior; special education, and adult health impacts of heart disease, liver damage, stroke, and premature aging of the brain and related cognitive impacts.

Additional information on selected themes is provided below:

1. The Washington State PBT Program and Lead CAP:

Request: Include additional recommendations for action from listed policy options and outline the economic advantages of reducing lead use.

We commend Washington State for its leadership on persistent bioaccumulative toxic chemicals, including the development of a state program to address toxic chemicals, and for the development of the Draft Lead Chemical Action Plan. The Draft Lead CAP contains a comprehensive compilation of information on lead, its health effects on humans and other animals, and on options for reducing lead exposure, and serves as a very useful reference document. We request that the report also include the recommendation outlining the economic advantages of reducing the use of lead.

We also commend the Washington State Departments of Ecology and Health for their conclusions and guiding principles in developing recommendations. A crucial foundation for action includes the assessments:

that there is no safe level of lead; the priority should focus on protecting children and other vulnerable populations; eliminating lead use is the best way to reduce lead exposures long term, and preventing lead exposures is a smart, healthy way to lower societal costs [Draft CAP, p. xi; unless otherwise indicated, citations below within brackets will also be this document]. This summation is consistent with the mission of WPSR and we emphasize the need for a strong Lead CAP in order to achieve protecting children's health from hazardous exposures to lead. We urge the lead CAP to include recommendations for action that are listed as policy options, even if some recommendations require a longer, multi-year timeframe for full implementation.

2. A comprehensive approach and blood lead levels.

Request: Include recommendation that children's blood lead level should be a maximum of 2 µg/dl.

We commend Washington State Departments of Ecology and Health for a comprehensive approach toward reducing lead exposures. The Draft Lead CAP recognizes that an effective program to reduce exposure will require the concurrent use of several different approaches including public education, blood lead level testing, environmental testing, removal of existing exposure sources, and reducing and eventually eliminating production of new exposure sources [p. 15]. The goal should be to ensure that no child in WA State ever has a blood lead level above 2 µg/dl.

3. Biomonitoring for blood lead levels in children.

One recommendation of the Draft CAP is universal screening of children up to 6 years old for lead risk factors, and voluntary testing of blood lead levels in targeted child populations with one or more risk factors indicated [p. 223]. In this regard, agencies may already be aware of the efforts of the Lands Council, a non-profit in Washington State with a Targeted Grant from EPA to conduct lead level screening and testing in the Spokane area using such an approach. Details are contained in the Council's web pages, at www.landscouncil.org/water/reducing_lead.asp. But briefly, demographic data from the U.S. Census for each census group in the city of Spokane, in the form of percent children in poverty, populations of children under 5 (the closest Census data to the 0-6 category), and median household income, were loaded into Geographic Information System (GIS) software. GIS was used to sort each data category by statistical quartiles,

which were rated on a scale of 1-4 (higher ratings for lower incomes, lower ratings for lower values of the other categories), and summed. Using this approach, a lead risk map was generated for census groups across the city. With the risk factor map, along with maps for residential structures built before 1950 (an additional lead risk factor), the Council identified neighborhoods potentially at risk, and then solicited the support of applicable neighborhood organizations to conduct door-to-door public education campaigns and voluntary blood lead level testing in children. The web page cited above contains links to maps depicting demographic risk factors and pre-1950 residential structures for selected city neighborhoods.

According to the Council's web page, results as of October 2, 2008 indicated one child with elevated blood lead levels out of 214 tested. The Draft CAP acknowledges limited testing data in WA, but this frequency is reasonably consistent with the percentage of children with blood lead levels above 10 µg/dl, reported for 2007 [Appendix C, p. C-1]. It would seem that this program could serve as a model for screening/testing elsewhere in the state (and across the nation, for that matter). The use of GIS with demographic data to conduct risk factor screening is also consistent with the DOH recommendation against use of a risk factor questionnaire [p. 31]. We encourage state agencies to contact the Lands Council directly for insights into their successes and challenges in screening and testing.

4. Specificity of Performance Measures.

We support the concept of Performance Measures to assess progress toward meeting goals of the CAP. However, we can identify a particular example where specificity could be added to a performance measure. With regard to environmental monitoring for ambient lead trends in water bodies [p. 260], the Draft CAP notes that Ecology rates water bodies for pollution. The highest priority sites (Category 5) for lead pollution are Lake Union in Seattle and North Creek in Pierce County, and eleven areas along the Spokane River are in Category 4A [p. 13]. For the category 5 sites, Ecology conducts a total maximum daily load (TMDL) analysis and develops a plan for meeting water quality standards. Category 4A means that levels are too high but the TMDL is completed and a plan is in place to meet water quality standards. In addition, DOH has issued a fish advisory for the Spokane River due to lead and PCBs; the general advice is not to eat any fish from an area downstream of the Idaho border [p. 49]. Performance measures for such sites should include first, whether a water quality plan has been implemented (not specifically stated in the discussion on p. 13-14), and then how rapidly levels of lead fall in water and fish once the plan is implemented.

5. Federal regulatory framework for toxic chemicals.

The Policy Options section includes a discussion of the weaknesses of the U.S. Toxic Substances Control Act (TSCA), and the European Union's implementation of the considerably stronger REACH approach to regulating toxic substances [p. 209]. The PBT program in general and specific measures to reduce lead exposure hazards would benefit in many ways from stronger federal regulation. For example, products contribute the largest amounts of lead coming into the state [p. 12], and imported products have

been reported responsible for childhood lead poisoning [25]. Moreover, while lead content in paint on toys and most consumer products sold in the U.S. is limited, lead paint is still widely used in other countries and had been found on some imported toys [p. 75]. This information indicates that public health protection should become sacrosanct in any trade agreements; U.S. standards should not be turned into a “ceiling” allowing more hazardous standards for imports, but rather should be set as a “floor” that cannot be weakened.

However, the current federal administration gives higher priority to removing regulations on corporations than to protecting public health and the environment. We urge that the Policy Options/Recommendations sections be expanded to discuss ways by which the state can effectively advocate stronger federal regulations, and/or bypass federal regulation under the law. In cases where federal regulation and standards fail to adequately protect children’s health, we urge avenues for state action to protect the health of infants, children and communities throughout Washington State.

As a final point, we urge that the final Lead CAP include the ethical foundation for protecting human health, and in particular, the health of infants and children, from preventable exposures causing harm.

We reiterate again our appreciation for Washington State’s leadership on addressing the critical issue of toxic chemicals and its work in creating the Draft Lead CAP. We emphasize the imperative for the state to extend its leadership by finalizing a strong Lead CAP that will ensure that children’s health, learning, and future potential is protected from these harmful exposures. ***Thank you for your time and your work.***

Sincerely,

Cherie Eichholz
Executive Director

October 6, 2008

Holly Davies, PhD
Chemical Action Plan Developer
SWFAP/ Industrial
WA Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Dear Ms. Davies, PhD

Re: (Public Review DRAFT) Washington State Lead Chemical Action Plan 2008

I am providing comment for the Washington State Nurses Association (WSNA). WSNA works to holistically protect individual citizens, the workforce and the community in which we all live from environmental hazards including chemical exposures.

We would like to thank the Department of Ecology and the Department of Health for all their hard work and dedication through process of developing the Lead Chemical Action Plan under the PBT Draft rule. Because of this rule, your strong support for the Children's Safe Product Act, and additionally with the PBDE bill has helped create Washington State in protecting children, worker's and the Puget Sound environment from toxic chemical exposures.

Let me be very clear, there is no known safe level of lead exposure. Even though children are at greatest risk of neurotoxic demise and other neurobehavioral problems, they're also at great risk for anemias, hearing loss and death from this heavy metal. New evidence also demonstrates adults are also at risk. New research highlighted during the Lead Cap demonstrated negative health effects at very low levels of lead for both children and adults, especially chronic low level exposure, which can cause learning disabilities and memory problems, increases in systolic and diastolic blood pressure, decreased kidney function and blood dyscrasias such as anemias. Lead is everywhere in our environment and Puget Sound and its wildlife suffer as well.

The debilitating diseases and other health effects caused by lead exposure emphasize the diligence we must have to substantially lessen or eliminate this hazard from our environment. Not to mention the loss to our state economy and the societal impacts. It is critical that the Lead CAP be as strong as it can to protect our citizens, our businesses our environment and generations to come. Policies must be strong and enforced. We must be ever vigilant of ongoing sources of exposure and eliminate them, and we must continue to seek alternatives.

The Lead CAP was well researched including critically new evidenced based research on the health effects both to children, adults and disproportionately disadvantaged groups. The stakeholder process gave all sides opportunity to expound on alternatives, exposure issues, etc., which made for a lively debate and a robust CAP. I feel it is critical to educate not only the public and healthcare providers but also academia about the health effects of lead and the need to test all children in Washington State. However, I feel the CAP came up short on fully protecting Washington's citizens and wildlife and recommend the following actions:

1. The Lead CAP should have long term goals and benchmarks to monitor improvements and goals reached. We must have measurable goals to determine success. Furthermore, the policy options listed on page 202 of the Lead CAP report, should be included in the
2. The report needs to include clear goal and also recommend that children's blood lead level should be 2 ug/dL. Science now supports that 2 ug/dL is limit, not 10 ug/dL, which is currently used by health agencies
3. The report should also recommend occupational guidelines for adult exposure to lead, which should be no greater than 25 ug/dL, as outlined in the Association of Occupational and Environmental Clinic's Lead Exposure recommendations. Reporting must be mandatory, risk reduction methods and regulations should be enforced.
4. The report must recommend specific actions to protect against "take home" exposures, for example, lead brought home from the work environments like smelters or from home hobbyists like home smelting.
5. The report recommendations on education need to be improved. Ecology has focused most of their recommendations around public education – a good thing, but not enough (see all of our other points). In the arena of education though, the report should include recommendation to explain the economic advantage of reducing the use of lead. Data in the report supports this (page 235). And, as mentioned prior in this document, education is essential, addressing current recommendations. However, education must reach to health care providers and academic institutes and schools such as Public Health, Medicine and Nursing.
6. Report should include ethics argument. The reduction of lead exposures, especially for children, is our duty to future generations. This should be more explicitly explained in the report.
7. Report should recommend requiring a look at cumulative impacts from facilities that are permitted for air emissions. Right now, the state looks at each facility as a stand-alone. Many facilities emit lead.

WSNA supports current recommendations outlined in the Lead CAP draft document in addition to the recommendations outlined above. Continued research into safer alternatives for lead is critical as there is no safe level for lead. Our environment is precious; our resources in Puget Sound are finite. We are charged with protecting all creatures and habitat in the Puget Sound region. The Lead CAP is a great step in this direction. WSNA greatly appreciates all the hard work the Departments of Ecology and Health and have put into this document.

Please feel free to contact me if you have further questions. It has been an honor to have served on the Lead Chemical Action Plan Advisory Committee.

Karen R. Bowman, MN, RN, COHN-S
WSNA Environmental Health Specialist

(via email)

October 6, 2008

Holly Davies, PhD
Chemical Action Plan Developer
SWFAP/ Industrial
WA Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Re: *Washington State Lead Chemical Action Plan (Public Review DRAFT) 2008*

Dear Ms. Davies,

I am providing comments on the *Washington State Lead Chemical Action Plan (Public Review Draft) 2008* on behalf of the Washington Toxics Coalition (WTC). WTC is a statewide organization that works to protect public health and the environment from sources of toxic pollution.

We thank the Departments of Ecology and Health for devoting significant time and resources to the development of the lead chemical action plan (CAP). This work, along with Ecology's and Health's work performed under the PBT program and the Children's Safe Product Act, has established Washington state as a leader in protecting health and the environment from toxic chemicals.

There is no safe level of lead exposure. Lead is a very potent neurotoxin that is harmful at very low doses. It is especially hazardous to young children. Children exposed to even the smallest amount of lead are more likely to suffer from learning disabilities and behavioral problems. Lead also is a problem for wildlife and Puget Sound. Lead is above standards in many areas of Puget Sound and is also found in waterfowl due to lead shot use in wetland areas.

These devastating impacts underscore the need to prevent exposures before they occur. Damage from lead is irreversible and costs Washington state millions of dollars each year in healthcare, environmental cleanup, and disposal. It is critical that the CAP adopt a robust list of recommendations to eliminate unnecessary lead exposures in addition to policies aimed at identifying and cleaning up exposures that have already occurred.

The CAP is a well-researched, comprehensive study on the presence of lead in our environment, homes, schools, and workplaces. It does a good job of chronicling the devastating effects of lead on human health and the environment. However, the plan's proposed recommendations will not adequately protect Washington's citizens and wildlife from the hazards of lead exposures. The plan's recommendations must be improved to adequately fulfill the goal of the PBT Program, which is to "reduce and phase-out PBT uses, releases and exposures in Washington" (WAC 173-333-100).

Specifically, the CAP should contain the following recommendations:

- **Continue to evaluate children's products for lead and take action when necessary to protect the health of children.** Lead has no business being in children's products. Safer alternatives to lead exist and many manufacturers have already stopped using lead in their paint and plastic. Ecology and Health must continue to evaluate the presence of lead in children's products, including vinyl products, jewelry, toys, art supplies, and cosmetics, and take action when a product is found to be hazardous to a child's health.
- **Include lead on list of chemicals of concern for children to be developed under the Children's Safe Products Act.** Lead is clearly a chemical that affects children's health. Including lead on the CSPA list will not only provide Ecology with information on the products containing lead, but will also provide critical information to parents and other consumers about the products they purchase for their kids.
- **Phase out all unnecessary use of lead in vinyl products and provide information to consumers on how to avoid vinyl products.** The manufacture, use, and disposal of vinyl can expose people and wildlife to lead. For most applications lead is unnecessary and should be phased out. Also, consumers should be made aware of the problem of lead in vinyl and given information on how to avoid vinyl products.
- **Enforce the state's lead in packaging law - RCW 70.95G.** The state must begin enforcing the lead in packaging law. Eliminating lead from packaging not only protects human health, but also prevents lead from contaminating the solid waste stream and, ultimately, contaminating our environment. Also, the State should join the Toxics in Packaging Clearing House to help facilitate enforcement of law.
- **Establish policies and programs that help businesses phase out their use of lead.** Ecology should provide more technical assistance to businesses to phase out lead. Ecology should also facilitate the identification of safer alternatives to lead through partnerships with academic institutions, trade associations, and nonprofit groups. This work is especially critical to preventing further lead contamination of Puget Sound.
- **Require businesses to report the amount of lead they are using.** This would provide critical information to Ecology and the public on where lead is used in the state. It also would serve as a deterrent to businesses that do not want to be seen as using a harmful chemical.
- **Lower blood lead action levels for children, workers, and other sensitive populations so that the levels reflect a goal of zero exposure.** For example, the

blood lead action levels for children should be 2 mcg/dL. This would allow the state to identify lead problems early and take preventive measures.

In addition, we support the CAP's current draft recommendations, especially the recommendations around reducing the use of lead in wheel weights, fishing tackle, and shot. Safer alternatives exist for these types of uses and several states have already taken action to substitute safer alternatives for fishing tackle and shot.

As the CAP points out, there is no safe level of lead. Our children deserve to grow up in an environment free of lead contaminated air, food, water, and consumer products. Puget Sound must be protected from further lead contamination so that efforts to clean up existing contamination are successful and Puget Sound can remain healthy and lead-free. The draft CAP's recommendations, along with the additional recommendations outlined above, will help Washington achieve these goals.

Thank you again for your work on the CAP. Please feel free to contact me if you have any questions or concerns.

Sincerely,

Ivy Sager-Rosenthal
Campaign Director
Washington Toxics Coalition

From: Mullen, Jim
Sent: Thursday, October 02, 2008 6:52:27 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Ms Davies

We have reviewed the section in the Lead Chemical Action Plan on the "Recommendations To Lower Risk For Wildlife And The Environment".

It is not our desire to try to halt legitimate efforts to minimize or end the use of a dangerous substance or dangerous compounds. To this end, there are already programs in place that dictate the use of non toxic projectiles for hunting waterfowl and in other areas where there is an increased potential for possible ingestion by wildlife.

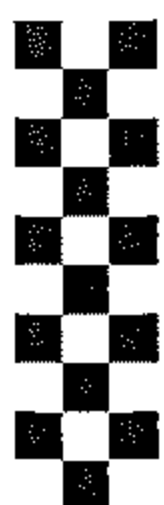
However, we are concerned that the solutions proposed in the Plan address a problem that either doesn't exist or is so small that it is statistically insignificant. The effects of lead and lead compounds on wildlife that inhabit areas where dry land hunting or where fishing take place do not appear to be a problem.

The wording in the Plan suggests that a ban on the use of lead and lead compounds for fishing and hunting use is desirable or may even be required. This is unnecessary and it is our position that it be vigorously opposed before the decision to end use of lead and lead compounds in fishing and hunting winds up being an unfortunate example of the "Law of Unintended Consequences".

Jim Mullen

President

Washingtonians for Wildlife Conservation



West Coast Shot, Inc.

32 Red Rock Road Carson City, NV 89706 Phone (775) 246-5588 Fax (775) 246-3875

October 6, 2008

Holly Davies
Dept of Ecology
P.O. Box 47600
Olympia, WA 98504-7600
Fax: (360) 407-6102

One of the ammunition segments of your concern, as well as ours, is lead shot produced for the reloading industry.

With the laws currently in place for the restriction of the use of lead shot in hunting, coupled with the fact that hunting has been for decades a very small percentage (5% - 10%) of the use of our product, it is self explanatory that our product is primarily used on ranges. Skeet, Trap, Sporting Clays, etc.

We have been proud, and actively participating in the reclamation process that occurs at said ranges throughout the United States, and more precisely the great state of Washington. In short we are an industry that cleans up after ourselves.

Indeed, this recycling effort is economically driven, but this should not diminish the end result of such a program. We are sure that records exist of all the "clean up" measures taken by the individual shooting clubs of which they are part beneficiaries in the amount of shot reclaimed.

West Coast Shot Inc. is a subsidiary of Metalico Inc. which with any research at all will show that recycling is the corporate montra. In general, we are very "green" conscious with regards to all sorts of metals, and in particular lead in the form of shot.

Please take this in to consideration in your planning process with the formidable task that lies before you.

Most Sincerely,
Bryan L Rich
General Manager
West Coast Shot Inc.



WESTPORT CHARTERBOAT ASSOCIATION

P. O. BOX 654 • WESTPORT, WASHINGTON 98595

October 3, 2008

Holly Davies
Dept of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Re: Lead CAP

The members of the Westport Charterboat Association provide fishing trips for the public off the SW Washington Coast. We fish almost exclusively outside State waters. We use fishing leads as part of our activities. These lead sinkers range in size from ¼ to 36 ounces and in length from ¼" to 5-6".

Angler traffic on the ocean off the Washington coast typically ranges from 50,000 – 75,000 anglers per year and less in recent years as a result of severe restrictions on fishing quotas and seasons.

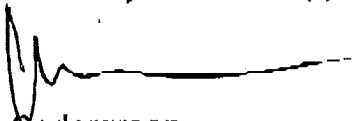
Lead sinkers/lures in the size/weight range that you propose phasing out is acceptable. Phasing out larger/longer sinkers/lures would create a substantial problem for us.

First, other metals, being less dense, have to be heavier and larger than lead. The resulting increased hydraulic drag then adds to the need for more weight, thus greater size, ad infinitum.

Second, in past experiments we have found that alternatives were higher cost per unit and had much less shelf life, adding greatly to operational costs. Current profit margins are very small as a result of declining anglers per trip and greatly increased fuel cost.

Finally, although the smaller leads (1 oz/1") could be ingested by fish, to our knowledge, the larger ones are not.

Thank you for the opportunity to comment.



Mark Cedergreen
Executive Director
360-268-0445

Yakima Rifle and Pistol Association
3703 Parkway Place
Yakima, WA 98902

Ms. Holly Davies,
Department of Ecology

Dear Ms. Davies,

Thank you for allowing me to comment upon the Draft Lead Chemical Action Plan proposed by your agency. I have read through the document several times and let me commend you and your group for addressing an issue that, while decreasing greatly (lead blood levels decreased 842% from Table III-3, page 29 of the CAP), it is still a problem on some fronts. Lead pigmented paints and tetra-ethyl-lead motor fuels used outside of the US are noted as major issues.

Next, let me say that I would never presume to comment about hunting, hunters and lead use in the game fields, as I am not a hunter. I am sure that you will receive comments from groups that represent those individuals. However, please let me comment as a leader in the sport shooting field. As the president of the Yakima Rifle and Pistol Association, the oldest continuously active NRA club in the United States, I feel an obligation to acquaint you with some information that your Draft Plan does not contain.

The CAP's reliance on Pittman-Robertson tax returns greatly underestimates the amount of ammunition that is fired in Washington, most likely by about 100% for shotgun shells, 500% for rifle cartridges and 1000% for handgun cartridges. The taxes on reloading components represent many more cartridges than newly manufactured ammunition. Probably half of all shotgun shells fired in this state are reloaded by the shooter, and not purchased new as finished shells. The shooter who reloads does not pay a representative tax on his components. A rifle hunter may fire three shots at game in a year of hunting, while a competitive rifle shooter easily fires 200 rounds a week for practice and matches during 30 weeks of competitive shooting annually. I seriously doubt that more than 250 handgun rounds are fired at game animals in the whole state of Washington in one year, while a competitive pistol shooter fires 400 rounds a week, every week. I do not know of a single competitive shooter who does not reload almost all of their practice cartridges and most of their competition cartridges. Again, these are not reported in the tax statistics. The exception is the Small-bore, 22 rim fire, competitive shooter who cannot reload their ammunition and must purchase manufactured cartridges.

So what is happening to all the lead shot that we are using? Much of it is recycled! Trap, Skeet and Sporting Clay shooters use the same size range of shot, #7, and #7 ½ and #8. Since all shells impart the same velocity to the shot, it falls to earth in a very predictable area, down range of the shooter. There are several companies that bid on the rights to "reclaim" the shot fired at these games. Clubs either take a percentage of the reclaimed shot, and sell it to its members, or receive needed income for the club. The shooter, who is reloading his shells, then uses this reclaimed shot to shoot at the range again. As I write this on September the 25th, the Spokane Club's

contractor is mining the impact areas at this time. Shooters value a clean environment and being able to increase the recycling of lead from our ranges would benefit our programs.

The economics of sporting shotgunning is easy to understand. Steel shot is unusable for sport shooting because the games are based upon a large number of small shot fired at a clay target. Unlike hunters who need high energy per shot, which high speed steel shot delivers, sport shooters need a small shot that shoots flat, i.e. it has to have high density. Small steel shot falls to ground twice as fast as lead shot. At the range that clay targets are struck, the shot would be many feet below the target. This leaves us with bismuth alloy shot. One shell of 12 gauge size of bismuth alloy shot costs \$2.85 compared to a newly manufactured lead shot shell of \$.18 or a reloaded shell at \$.12. Or for a normal Saturday afternoon of shotgunning, 100 targets, it would cost \$285 for bismuth shells, \$18 for new shells or just \$12 for reloads.

Recycling of pistol and rifle spent bullets is slowly increasing as the price of lead scrap approaches \$1 per pound. As wheelweights are used less and less, bullet casters are gleaning spent bullets for a source of lead to recycle to make bullets. Our issue is that the ranges were never designed to recycle these bullets, but have them embedded into dirt backstops. As the face sloughs off, the bullets end up in the spill face of the backstop. Presently we are having some gleaners making \$75 per hour picking up bullets and recycling the lead to commercial dealers.

Rifle and pistol shooters have a couple of issues whether they are formal, competitive, and informal, “plinker”, shooters. The primary one is lack of facilities. I have lived in Washington for 35 years and exactly one, 1, new public range has been built in that time, and many have closed! Shooting is a part of many peoples’ lives, even urbanites, because it is fun and great recreation. Washington needs new safe and environmentally friendly ranges close to urban areas. Very little of this lead is recycled except for a few bullet casters who glean the impact areas. It is technically easy to build recycling bullet traps, but relatively expensive for non-profit clubs. Secondly, the public ranges are old as most were built shortly after WWII. Some are on leased public lands, or owned by a small non-profit club. But in either case, there is not capital to build modern backstops that could recover more of the lead bullets. Since there are less than 25 public ranges in the state, grants to build modern backstops would make lead bullets a minute source of lead in the environment.

Shooting ranges have also become an oasis of habitat for many areas. The Kenmore Range and the Paul Bunyan Range, Puyallup, are prime examples. Both are old ranges that have urban development surrounding them. Paul Bunyan is also a Game Refuge and a Tree Farm. They have large numbers of trees for noise reduction, very few structures and minimal pavement. They provide protection for deer, small mammals and birds that would otherwise be pushed out by apartment and retail construction. They also protect wetlands and stream habitat by absorbing storm water runoff. Ranges and their back stops are never built in wetlands or over water because of the need for shooters to walk up to the backstops and replace targets and do range maintenance.

My thoughts on reloading ammunition are these: separate non-lead primers are manufactured only by Blount-CCI for sale to reloaders and they are using almost all for ammunition they sell, very few are available to the reloader; home casting of bullets is very safe with even the most

basic of personal hygiene attention and as a lifelong bullet caster feel free to contact me at any time in the future to discuss this activity.

Attached is a list of items presented in the CAP that are viewed as less than scientific or fit into the myth classification by most of the 45 million person shooting community.

The shooting community needs are:

1. New facilities near urban areas
2. Grants to increase lead recycling at existing ranges
3. Preservation of existing ranges to offset increasing urbanization

I will close with a thank you for being wise and recommending an “educational” approach to dealing with lead in the environment as far as sport shooting is concerned. Regulating the shooting sports is a very “hot button” issue with millions of folks around the country. Helping people make wise decisions about their stewardship of the environment can lead to many good things that regulations would only result in legal battles.

Please feel free to contact me at any time if I can be of any assistance with your project.

Sincerely,

Ric Bowman, President YRPA
rcbowman@charter.net
509.966.3944

Changes needed CAP

Page 8.

Bullets and shot should be removed from the list of lead compounds. Lead compounds are never used in shot or bullets. Metallic lead and lead based alloys, mainly of metallic tin and metallic antimony, are used in shot and bullets. The density of lead oxide is so different than metallic lead that the projectile would not fly true if any were contained in a projectile. Bullet casters and shot makers go to great lengths to coat bullets and shot to prevent oxides from forming by coats of graphite and greases. These metallic alloys are insoluble in water.

Page 25.

I can find no reported child lead exposure from bullets or shot other than ingestion from lack of parental supervision and failure of stopping children from eating them. Lead from shooting is not an issue. Remove shooting as a source of child exposure to lead.

Page 48.

The case of the California Condor Study may be invalid, or at least there is controversy over its methodology. Waterfowl is an accepted issue for exactly the reason noted. Eagles may or may not be relevant.

Page 98.

Remove the word “Most” from sentence about “available ammunition”. This is a false statement. Very few types of ammunition are found in non-lead versions. The only exception is the shot in shotgun shells specifically made for hunting waterfowl, and they have lead styphnate primers. There are exactly two small companies that made hunting bullets for rifle hunting based on copper alloys. There sales are a minute quantity of rifle bullets made at a cost 600% greater per bullet. These two small companies also make handgun bullets but that percentage is even less. The so called “non-toxic” handgun bullets are lead cored with a coating of copper alloy that is basically sold to police departments with indoor ranges or required in indoor ranges with poor filtering systems. Other than the hunting bullets noted, the only non-lead cored rifle bullets are military steel or tungsten cored armor piercing bullets.

Lead styphnate is less sensitive than mercury fulminate or lead azide primers that were used in the 1800’s through the 1960’s but its primary function requires it to be very shock sensitive. (Citations from Wikipedia are not very reliable.)

Page 99.

There is exactly one manufacturer of non-lead primers in the US for reloading (Blount-CCI), and they don’t have many to sell to reloaders. US military contracts and law enforcement agencies are the major consumers and leave little production for civilian shooters. Rimfire cartridges have no separate primer, but contain priming compound within the enclosed rim of the case.

Remove the entire second sentence about bullet casters or their families having high lead blood levels. This is supposition or innuendo. Or cite scientific study or proposed scientific study that this is more than urban myth. I can find no studies, or reports that casting lead alloy bullets have ever been scientifically linked to high lead blood levels to casters or members of their families.

I can find no studies that “range workers” have any higher blood levels of lead than the ordinary population when using basic PPE and basic personal hygiene. Cite scientific study, proposed scientific study or remove.

Pages 100 -105.

Your case is well made for using non-lead shot for shotgun hunting.

Sport shooters have no dead animals on their ranges. Uptake thru “gut piles” or carcasses of animals is not an issue on established shooting ranges.

Your 95% of tax monies from ammunition sales is way out of line. Tax paid on firearms and accessories sales are at least 50% for the revenue. A shooter buys a rifle and scope for \$750 and may shoot \$40 worth of new ammunition per year per rifle. It will be 18 ½ years before he equals the costs of new ammunition to the cost of the rifle.

Comments submitted by Individuals

From: David Abbot
Sent: Thursday, October 02, 2008 7:16:34 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Look guys, this is not rocket science. Lead is poisonous. There is absolutely no excuse for you to drag your feet about getting lead out of our environment. You work for the citizens of America. Or, at least you are supposed to. If you can't bring yourselves to do your job, you should not have your job.

David Abbot
4014 Federal Ave
Everett, WA 98201

425-258-6884

From: rsa180a@aol.com
Sent: Monday, September 22, 2008 12:35:27 PM
To: Davies, Holly (ECY)
Subject: lead ammunition ban

Holly Davies,

I would like to let you know that I am against the lead ammunition ban. This would seriously constrain peace officers in their training and in the conduct of their jobs. It would also seriously constrain hunters and target shooters who are the main supporters (through fees on hunting licenses) of the wildlife you seek to protect. Do not do this.

Thank you for your time.

Richard Abbott

Steilacoom, Washington

Find phone numbers fast with the [New AOL Yellow Pages!](#)

From: [Farrell Phillips](#)
To: [Davies, Holly \(ECY\)](#);
Subject: About the Lead Chemical Action Plan
Date: Monday, October 06, 2008 2:27:45 PM

Dear Holly:

Just one retired Boeing mechanic and long-time outdoorsman's opinion about the Draft Lead CAP. Somehow, this all reminds me of Mark Twain's famous (and humorous) "the rumors of my death have been greatly exaggerated"!!

For many years, target shooting has been restricted to shooting ranges and indoor ranges. Under the penalty of heavy fines that is, for "scofflaws". I fully agree that there should exhaust fans in the indoor ranges, to disperse the fumes and potential danger. However, in our "great outdoors" that we are blessed with in our great State - I don't quite understand the alleged "danger" of lead bullets?

At the present time, there is no practical or adequate substitute for lead in making bullets. The plating processes have now advanced to a point that lead bullets can be coated so there is no lead exposed. Copper seems to be the most used and most popular coating, encasing the complete bullet so you would never know the bulk of it was lead.

In any event, I think the lead in ammunition is "miniscule" in our environment. At the very least, I

honestly think much more research is needed before
any (more) laws are drafted!!

Thank you for considering the above.

Sincerely,

Farrell W. Phillips
1510 Maple Ln. Trlr 21
Kent, WA 98030 - 7456
Ph: (253) 850 - 7172
E-Mail: FarrellPhillips@msn.com

From: Fred T. Adams
Sent: Friday, September 19, 2008 1:36:04 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

You must not ban lead ammunition in Washington State. There is no adequate substitute for lead ammunition, so the ban is in effect a ban on the use of firearms. Although environmental law and regulation has been used before to enforce a political agenda not related to the environment, the practice is immoral and unethical. A state agency should not stoop to this.

Affects on humans and wildlife do not justify a ban as recommended by her Department of Ecology. Beyond the effect of lead shot on waterfowl, there is no demonstrated effect on humans or animals from the use of lead ammunition. Lead shot is already not used. The California condor claim is not based in valid science, is merely a pretext in that state to ban hunting and shooting sports.

Even if there were demonstrated effects, you are obligated to seek other solutions. Banning lead ammunition is not acceptable.

Fred T. Adams
Kennewick, Wa

From: Nicole Adams
Sent: Friday, October 03, 2008 5:11:31 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Nicole Adams
16422 SE 17th St
Bellevue, WA 98008

From: Chad Alexander on behalf of chadalex@gmail.com
Sent: Sunday, October 05, 2008 5:47:38 AM
To: Davies, Holly (ECY)
Subject: Lead ammunition ban (Lead Chemical Action Plan)

Dear ma'am/sirs

I respectfully ask that you reconsider the banning of lead ammunition from hunting in the state of Washington. There appears that no one is considering the future cost to hunters and sportsman who shoot and hunt in this state. There is NO adequate substitute for lead ammunition to hunt with and that any affects on humans and wildlife DO NOT justify a ban as recommended by the state Department of Ecology. Please reconsider implementing this action.

Sincerely,
Chad Alexander
549 Summit Lake Shore road N.W.
Olympia, WA 98502
360-866-0859

From: Joseph Alexander

Sent: Friday, September 19, 2008 12:43:00 AM

To: Davies, Holly (ECY)

Subject: Bogus lead ban

To whom it may concern, The Idea of a lead ban is a very bad idea, as well as any ill effects on humans and wildlife in hunting applications is unproven. To jump the gun so to speak and ban something for the sake of kissing Californias butt is wrong, we as hunters have been using lead based ammunition to hunt with for hundreds of years and there is no proven issues with it. As well there are no creatures in this state the can be affected by it, you've already banned lead shot in water fowling, as of this point there is no substitute for a hunting round that is accurate enough or lethal enough to do the job consistanly. What it sounds like to me is another way to go after firearms in this state. As a voter I will take it to the streets and to the poles.

A concerned voter.

Joseph Alexander

From: Brigitte Allen
Sent: Thursday, October 02, 2008 11:58:15 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Brigitte Allen
8813 17th ave cir nw
Suite 540
Bradenton, FL 34209

From: Dr. Paul Allen
Sent: Sunday, October 05, 2008 4:32:32 AM
To: Davies, Holly (ECY)
Subject: Physicians for zero lead exposure

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

As a physician, I learned early on in my career how damaging lead is to a child's neurologic system.

I strongly agree with the points outlined in the remainder of this email.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Dr. Paul J Allen
2938 Limited Ln NW, Suite B
Suite B
Olympia, WA 98502

360-352-8800

From: Kathleen Allen
Sent: Thursday, October 02, 2008 8:12:20 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan. As a physician, I counsel parents every week about the dangers of lead and all the possible sources of exposure.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

Did you know that lead is used to stabilize the plastic in garden hoses and insulated lunch boxes and some mini-blinds. It is far more than paint that parents need to worry about these days. Children naturally put everything in their mouths and spend more time on the floor, so they are more at risk of exposure to lead dust. Please help preserve the health of our earth for our children.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Kathleen Allen
8302 NE 148th Place
Kenmore, WA 98028

(206) 290-5824

From: Tom Allman
Sent: Saturday, October 04, 2008 4:33:59 AM
To: Davies, Holly (ECY)
Subject: lcap

Dear Holly;

I am writing in response to the lcap program. I see that ammunition is not being banned, but fear that it will be at a later date. While there are some alternatives to lead, many antique firearms are not safe to shoot with copper projectiles, due to weaker steels and the higher pressures generated by harder bullets. In fact, I beleive that current wfdw regulations prohibit the use of projectiles other than lead in muzzle-loaders during muzzle-loader season. Many old muzzle-loading firearms will not function properly with anything but soft lead balls.

As an antique firearms enthusiast, I have great concern for this proposal.

listening:

Thank you for

Tom Allman
Kelso, Wa.

Stay up to date on your PC, the Web, and your mobile phone with Windows Live. [See Now](#)

From: Kerri Altom
Sent: Thursday, October 02, 2008 1:13:55 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Kerri Altom
17904 SE 38th Street
Vancouver, WA 98683

(360) 253-5593

From: Robert
Sent: Thursday, October 02, 2008 1:38:27 AM
To: Kastama, Sen. Jim
CC: Davies, Holly (ECY)
Subject: Re: Lead Chemical Action Plan

Thank you for this information, however, the wording I'm concerned about is still in the draft. Page 208 of the CAP states, "Products that do not need lead and directly expose wildlife include wheel weights, small fishing weights, and some ammunition." I infer from this that if the CAP suggests some ammunition "does not need lead" then such ammunition should be banned and made from alternative materials. The plan includes a cost analysis of banning lead shot. If a ban is not a consideration, then why is the Department of Ecology analyzing the cost of such action? Recommendation 9 on Page 235 of the CAP calls for a phase out of lead shot. "Phase out" sure sounds like "ban" to me. While it cannot be proven at this time, I can just about guarantee that lead ammunition bans are on the minds of many people involved with the CAP project. As I've already stated, this will be an unacceptable outcome for everyone involved in the shooting sports. I am an active Cowboy Action shooter and we can ONLY use lead bullets for SAFETY reasons. There is no alternative ammunition. We shoot at flat metal targets at close range and the bullets must flatten on impact to prevent ricochets. Only lead bullets will do this.

Please help me insure this regulation is clarified.

Thank you,
Robert Amburgey

On Sep 29, 2008, at 8:57 PM, Morrell, Rep. Dawn wrote:
Dear Mr. Amburgey,

I received this email from the Department of Ecology last Tuesday, September 23, 2008. As you can see DOE has deleted the language regarding the prohibition on lead shot. I hope this puts your concerns to rest. If you have any other issues you would like me to research for you, please don't hesitate to contact me again.

Sincerely,

Representative Dawn Morrell
25th Legislative District

This e-mail is to alert you to a correction in Ecology's draft Lead Chemical Action Plan (CAP). On page 233, Recommendation 9, stated: "In areas where WDFW has required non-toxic shot, other non-regulated activities such as target shooting and shooting ranges should be prohibited from using lead shot." This language has been deleted.

This language was inadvertently left in the draft CAP from a previous draft and is not our recommendation. As we have stated, Ecology does not recommend a ban or regulation of lead in any type of ammunition beyond current law. Our recommendation is to work with WDFW, hunters and shooters in development of voluntary approaches to reducing harm caused by the use of lead shot. The inclusion of the language above is an oversight, and has been removed from the draft CAP, which is currently out for public comment.

Sincerely,

Holly Davies
Chemical Action Plan Developer
SWFAP/ Industrial
WA Department of Ecology
PO Box 47600
Olympia, WA 98504-7600
Phone: 360.407.7398
Fax: 360.407.6102

On Sep 26, 2008, at 12:20 PM, Kastama, Sen. Jim wrote:

Dear Mr. Amburgey:

Thank you for sharing your thoughts on Department of Ecology's Draft Lead Chemical Action Plan. You made some very valid, solid points. Even though Senator Kastama is out of the office at the present time, I wanted to get back to you right away.

As we understand it, the Department of Ecology is currently soliciting

public comments on its Lead CAP as part of its Persistent Bioaccumulative Toxins (PBT) Initiative, a procedural rule which establishes Ecology's process and procedures to address the subject of persistent bioaccumulative toxic substances and helps Ecology set its internal priorities in addressing PBTs. Understanding that this is a rule being pursued by Ecology, I would urge you to provide your comments to the Department of Ecology and to Governor Chris Gregoire by Monday, October 6th. Another good point to keep in mind is that our legislature does not go back into session until January 12, 2009.

Comments to the Department of Ecology should reference specific text from the proposal when possible. You may review the proposal from the following link: <http://www.ecy.wa.gov/programs/swfa/pbt/rule.html>

Please submit written comments to:

Holly Davies

Dept of Ecology

P.O. Box 47600

Olympia, WA 98504-7600

Fax: (360) 407-6102

e-mail: hdav461@ecy.wa.gov

Written, e-mailed, and faxed comments must be received no later than 5 p.m. on October 6, 2008.

And to reach the Governor, you can contact her office by phone at 360-902-4111 or by fax at 360-753-4110. You can also send her an e-mail by clicking here: <http://www.governor.wa.gov/contact/default.asp>

Hope this information helps,

Mary

Mary L. Sherman

Legislative Assistant to Senator Jim Kastama

25th Legislative District

Olympia Office:

Suite 235 John A. Cherberg Building

PO Box 40425

Olympia WA 98504-0425

360-786-7648

District Office:

107 West Stewart Suite E

Puyallup WA 98371

253-840-4701

-----Original Message-----

From: robertsjunk@earthlink.net [mailto:robertsjunk@earthlink.net]

Sent: Thursday, September 25, 2008 10:40 AM

To: Kastama, Sen. Jim

Subject: Lead Chemical Action Plan

SENATE INTERNET E-MAIL DELIVERY SERVICE

TO: Senator Jim Kastama

FROM: Robert Amburgey

STREET ADDRESS:

3213 17th Street Pl SE

Puyallup, WA 98374

E-MAIL: robertsjunk@earthlink.net

PHONE: (253) 848 - 8727

SUBJECT: Lead Chemical Action Plan

MESSAGE:

Robert Amburgey

3213 17th ST PL SE

Puyallup, WA 98374-1396

September 25, 2008

The Honorable Jim Kastama

Washington Senate

PO Box 40425

Olympia, WA 98504-0425

Senator Kastama:

There is no adequate substitute for lead ammunition and any effects on humans and wildlife do not justify a ban as recommended by the Department

of Ecology. This ban will affect many sportsmen and women and will not appreciably help wildlife. The shooting sports contribute large amounts of

money to improving wildlife environments through license fees. If these

sports stop or decrease due to this ban, this funding will be lost.

Please

say "NO" to the Lead Chemical Action Plan. Thank you.

Sincerely,

Robert Amburgey
2538488727

Employer Name: Alaska Airlines

Employer City: Seattle

Position: Pilot

Are you a registered voter?: Yes

Did you vote in the last election?: Yes

Gender: Male

Organization: NRA

Would you like a reply?: Yes

Have you visited our website?: Yes

NOTE: We are 99% sure that this constituent is in your district

RESPONSE REQUESTED: No response required by the sender.

From: TIMOTHY E ANABLE

Sent: Saturday, September 20, 2008 12:04:28 PM

To: Davies, Holly (ECY)

Subject: Lead Chemical Action Plan

Please consider the rights of those who shoot and enjoy the shooting sports. The lead used in bullets at shooting ranges is almost all reclaimed and recycled, leaving a very low impact on the environment.

A number of citizens enjoy sports where lead and other heavy metals are a part of that sport. Before making any decisions that limit or end any citizen's enjoy of their sports, please consider that most hobbies and sports involve cost, money that is spent in local boutique stores and shops along with the larger stores.

As a citizen of the great State of Washington I urge to consider the recreational uses lead and other metals are for and that at least on firing ranges the metals are recovered and reused.

From: Diane Anderson
Sent: Thursday, October 02, 2008 8:06:33 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies
I support a strong Lead Chemical Action Plan!

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Diane Anderson
1824 24th Avenue East
Seattle, WA 98112

From: eric, laura anderson
Sent: Saturday, September 20, 2008 2:07:34 AM
To: Davies, Holly (ECY)
Subject: Ban on sales of lead ammunition

Hello,

I live in Ellensburg, WA and I wish to let you know my feelings on the proposed ban of sales of lead based ammunition. Alternative no-lead ammunition is not available in all calibers for hunting or target shooting and when it is available it is quite expensive. For the average hunter like myself this could mean giving up a loved sport due to the cost. As the department of Fish & Game depends heavily on hunting license sales for their revenue this could have a most serious effect on their ability to operate.

Thank you,
Eric Anderson

From: Kimberly Andrews
Sent: Thursday, October 02, 2008 8:17:21 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Kimberly Andrews
220 N 57th
Seattle, WA 98103

From: Noel Angell
Sent: Thursday, October 02, 2008 7:27:17 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Noel Angell
270 Dorffel Dr. E
Seattel, WA 98112

From: Ray Antonsen
Sent: Thursday, September 18, 2008 7:49:43 AM
To: Davies, Holly (ECY)
Subject: RE: lead ban

Thank you for the opportunity to read the CAP.

It was interesting to note that one of the concerns was exposure of children to lead bullets. Not in my household. Most kids don't play with bullets.

Another interesting fact is that the Washington State Department of Wildlife **requires lead projectiles in muzzle loader hunts**. I noted that a representative from DFW was on the oversight committee & hopefully this issue was addressed.

I believe it was Minnesota that did a study on problems or toxicity of big game animals shot with lead bullets. No correlation/connection was found linking lead exposure to humans who consumed the game.

I urge your committee to be careful with the study. Many references are made to other states. Yet, as I stated in my earlier e mail, **there has been a clear political agenda in some of those studies--ie---California.**

I am a retired Washington State Employee. I was a Regional Administrator for 19 of those years. I sat on various oversight committees in which studies were done. It has been my observation that many of the studies done in various departments were "tweaked", misconstrued by the legislature, or "spun" to carry whatever the message the legislator wanted to present.

I readily agree with the non-toxic shot policy for waterfowl. **However, I vehemently disagree with your promotion of non-toxic alternatives for hunters and shooters. This reads--- We will require all bullets be made out of pure copper (such as Barnes--which sell for \$50+ for a box of 20). Also most companies do not manufacture pure copper, tungsten bullets etc. THIS IS A BACKDOOR APPROACH TO MAKING BULLETS UNOBTAINABLE, UNAFFORDABLE, AND PROMOTION OF A BAN ON FIREARMS & AMMUNITION.**

Again, thank you for the opportunity for feedback. It appears to that The CAP has been promoted & completed without adequate opportunity for input and/or careful selected input to carry forth some hidden agendas.

Ray Antonsen

Subject: RE: lead ban
Date: Wed, 17 Sep 2008 14:40:36 -0700
From: hdav461@ECY.WA.GOV
To: c.rant@hotmail.com

Thank you for sending in your comments on the Draft Lead CAP. There is no proposed ban on lead ammunition in the Draft Lead CAP. We would like to work with hunters and shooters to promote non-toxic alternatives to lead without negatively affecting hunting or shooting areas.

Please take a look at the fact sheet we prepared about lead ammunition and the Draft Lead CAP. I've attached the fact sheet to this email or you can access it at:

<http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/>

Sincerely,

Holly Davies, PhD
Chemical Action Plan Developer
SWFAP/ Industrial
WA Department of Ecology
PO Box 47600
Olympia, WA 98504-7600
Phone: 360.407.7398
Fax: 360.407.6102

From: Ray Antonsen [mailto:c.rant@hotmail.com]
Sent: Wednesday, September 17, 2008 1:51 PM
To: Davies, Holly (ECY)
Subject: lead ban

Well, here we go again. Under the guise of not polluting our environment, with the real objective to outlaw ammunition, the State of Washington is considering banning ammunition that contains lead. **Although the Condor argument is convoluted at best, the State of California chose to ban lead shot!** There are no studies showing that lead shot has had any effect on the condor population.

I would like to see the Washington State Department of Ecology make rational decisions without a covert political agenda (to ban guns, ammunition, and undermine the Second Amendment) in mind.

If in fact, you choose to ban lead in ammunition, please include **all parties, including sheriff & police departments, Washington National Guard, FBI, and any other organization that shoots lead and/or lead covered bullets. (Most ammunition has a lead base. Many bullets have lead cores with copper coating.)**

I appreciate the opportunity "to express my opinion". Thank you.

Ray Antonsen

Get more out of the Web. Learn 10 hidden secrets of Windows Live. [Learn Now](#)

Stay up to date on your PC, the Web, and your mobile phone with Windows Live. [See Now](#)

From: Barry S. Aoki

Sent: Thursday, September 18, 2008 12:09:07 PM

To: Davies, Holly (ECY)

Subject: Lead Chemical Action Plan

I was just made aware of the proposed Lead CAP and its effects on the use and possession of lead ammunition in Washington state.

There are no adequate substitutes for lead ammunition that I am aware of. The amount of lead used in the shooting sports and the effects on animals and humans d do not justify a ban on lead ammunition.

Please reconsider and do not ban lead ammunition.

Thank you,

Barry Aoki
Hawaii
(808)270-6536

From: Michael Archibald
Sent: Sunday, October 05, 2008 2:43:37 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Dear MS Davies:

Please be advised that I oppose the Lead Chemical Action Plan. The proposed Lead Chemical Action Plan will violate my Second Amendment rights by prohibiting almost all ammunition.

In addition the Lead Chemical Action Plan is a danger to the public safety, as it will stop individuals from being able to practice firing their weapons and stopping them from becoming proficient or from maintaining their proficiency, resulting in a real and present danger to the public safety.

Respectfully,

Michael D Archibald

PO Box 72

Thorp, Wa. 98946

kc7kem@fairpoint.net

From: Arndt, Meagan
Sent: Thursday, September 25, 2008 1:39:48 AM
To: Davies, Holly (ECY)
Subject: RE: Dept of Ecology Lead ammunition Ban

Thank you, Holly!

-----Original Message-----

From: Davies, Holly (ECY) [mailto:hdav461@ECY.WA.GOV]
Sent: Tuesday, September 23, 2008 5:13 PM
To: Sturdevant, Ted (ECY); Arndt, Meagan
Cc: Van Ness, Vickie (ECY)
Subject: RE: Dept of Ecology Lead ammunition Ban

Here is my generic response to people:

Thank you for sending in your comments on the Draft Lead CAP. There is no proposed ban on lead ammunition in the Draft Lead CAP. We would like to work with hunters and shooters to promote non-toxic alternatives to lead without negatively affecting hunting or shooting areas.

Please take a look at the focus sheet we prepared about lead ammunition and the Draft Lead CAP. I've attached the fact sheet to this email or you can access it at:
<http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/>

Sincerely,
Holly Davies

If the person says we should focus on important exposures, then I add that our priority is children's exposure to lead paint, since that is the largest source of lead for children.

I respond to other specific questions or comments as needed.

I've also attached the CAP to this email in case you'd like to look at the four page executive summary. We are definitely changing the wording to make it more clear that we are not calling for a ban on ammunition.

I hope this helps. Please contact me if you need anything else.

Regards,
Holly

-----Original Message-----

From: Sturdevant, Ted (ECY)

Sent: Tuesday, September 23, 2008 5:00 PM
To: 'Arndt, Meagan'; Davies, Holly (ECY)
Cc: Van Ness, Vickie (ECY)
Subject: RE: Dept of Ecology Lead ammunition Ban

The short story is that the NRA sent out a blast email saying we are proposing a ban on lead ammunition, and we are not. As we respond to these folks, they tend to calm down. We are doing a lead Chemical Action Plan (CAP), which is now out for public comment. An earlier draft had a recommendation to ban lead shot in certain cases, but that recommendation is no longer in the CAP, so there is an easy answer on this.

I'll ask Holly Davies, who is developing that CAP, to share further information with you about the CAP. Holly, I assume we've got a statement we can share with Meagan and Rep. Wallace?

Thanks,

Ted

Ted Sturdevant, Director
Governmental Relations
Department of Ecology
(360) 407-7003
tstu461@ecy.wa.gov

-----Original Message-----

From: Arndt, Meagan [mailto:Arndt.Meagan@leg.wa.gov]
Sent: Tuesday, September 23, 2008 4:55 PM
To: Sturdevant, Ted (ECY)
Cc: Van Ness, Vickie (ECY)
Subject: FW: Dept of Ecology Lead ammunition Ban

Ted,

Could you provide us with some information pertaining to the following constituent email? I am not familiar with this DOE ban on lead ammunition that he is referring to. I also got a phone call about this from a constituent.

Thank you,

Meagan Arndt
Interim Legislative Assistant to
Representative Deb Wallace

17th Legislative District
arndt.meagan@leg.wa.gov
360-786-7976 (Olympia)

-----Original Message-----

From: gbmeggs@comcast.net [mailto:gbmeggs@comcast.net]
Sent: Sunday, September 21, 2008 11:33 AM
To: Benton, Sen. Don
Cc: Dunn, Rep. Jim; Wallace, Rep. Deb
Subject: Dept of Ecology Lead ammunition Ban

HOUSE INTERNET E-MAIL DELIVERY SERVICE
SENATE INTERNET E-MAIL DELIVERY SERVICE

TO: Senator Don Benton

CC: Representative Jim Dunn
Representative Deb Wallace

FROM: Mr. Gustave Meggs

STREET ADDRESS:
13105 NE 80 Ave
Vancouver, WA 98662

E-MAIL: gbmeggs@comcast.net

PHONE: (360) 921 - 9461

SUBJECT: Dept of Ecology Lead ammunition Ban

MESSAGE:

The DOE proposed ban on lead in gun ammunition is gun control and nothing else. It is just another large step in that direction. In the name of saving the enviroment, any and all radical ideas can be implmented. ie the future ban on the washing your car. WASI feel this gives cover the radical agenda of the DOE.

NOTE: We are 99% sure that this constituent is in your district

RESPONSE REQUESTED: Mr. Meggs has requested a response to this message.

From: Carl Arnold
Sent: Thursday, October 02, 2008 10:21:07 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposure to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Carl Arnold
156 Prospect Park West
Brooklyn, NY 11215

From: Weldon Arnold

Sent: Saturday, October 04, 2008 1:25:06 PM

To: Davies, Holly (ECY)

Subject: lead ban

Dear Ms. Davies, I'm concerned about the lead ban, since I am pretty sure it will impact gun owners negatively. I also see no representation from the gun/shooting industry, or sportsman community. I have to ask why they/we were not given any representation? I do hope this oversight will be corrected, so as not to look like some other agenda might be happening here. Thank you, Weldon Arnold P.S. A metal that should be looked at is Aluminum!! I feel it has more of a health effect on us than is realized, and nothing is being said about it!!

From: David Attwood

Sent: Wednesday, February 20, 2008 10:50:19 AM

To: Davies, Holly (ECY)

Subject: Lead advisory recommendations

I cannot believe that you would have a committee writing proposed rules on and behalf of the gun owners and users and not have anyone representing their interests. If you persist in this plan of action you are in for a big outburst of objections with the state and national gun advocates.

This will cause a reaction that you will not be able to ignore.



From: Dave Avis
Sent: Thursday, September 18, 2008 11:38:32 AM
To: Davies, Holly (ECY)
Subject: Real bad idea

Holly,

More anti - gun tricks. The Gov. may well have just sealed her political fate. Amassing how the power of the pro gun folks is continually under estimated.

The King county crowd may love this idea, but if this measure even appears to be moving forward, they may learn a thing or two about protests.

I'd say stick to the shopping bag deal, this one is a big loser. Why are you folks in such a hurry to turn this wonderful state into L.A. north?

Dave

From: Jeff Ayres
Sent: Monday, October 06, 2008 1:28:23 PM
To: Davies, Holly (ECY)
Subject: Comments, Lead Chemical Action Plan

Attachments: LCAP Comments ver2.doc

Ms Holly Davies:

Attached are my comments on the Lead Chemical Action Plan that your team has developed. Some of the comments may appear to be rather blunt and strong in delivery. Please accept these comments in the professional manner in which they are intended. I mean no disrespect to you or the other authors.

I have over 33 years of combined professional experience in the sciences, project management, and engineering. Over 20 years of my career has been in the environmental field, 10 years as an environmental regulator. I am a licensed Geologist, Engineering Geologist and, Hydrogeologist in the state of Washington.

I appreciate the opportunity to provide comments on your plan. Thank you for making it available for public review and comment.

Sincerely,

Jeff Ayres
1105 Long Ave
Richland, WA 99354

hm: 509-942-9239
cell 509-430-5146

ayresjm2506@hotmail.com

Comments

DRAFT Lead Chemical Action Plan (Public Review Draft)

Submitted by Jeff Ayres, 1105 Long Ave, Richland, WA 99354

Home phone: 509-942-9239, cell phone: 509-430-5146

Ayresjm2506@hotmail.com

October 4, 2008

Number	Type/Location	Comment
1	General	<p>I have noticed that the plan has been put together by a number of highly educated and well respected people in the environmental and scientific community, however, the plan is very poorly written. Please accept these comments in the professional scope that they are presented. I do not mean to show any disrespect to the authors. I do have some strong comments, however, regarding the plan and my comments need to be presented as they are definitely valid.</p> <p>I am not questioning the actual toxicity of lead. There is no question that lead is toxic, however, different forms of lead have differing degrees of risk to human health and the environment. In general, the Plan treats all forms of lead as an equally high risk to human health and the environment. The Plan, in general, treats lead from an emotional standpoint and does not necessarily address the risk of lead in its elemental or metallic form (to include alloys commonly used by sportsmen). Lead compounds behave very differently from elemental or metallic lead as far as toxicity, leachability, mobility in soil and water, etc. Many of the conclusions presented in the Plan appear to be based on speculation and not necessarily on good science or factual data. The plan has been written with the general idea that all lead (all forms, metallic, oxides, etc) is extremely toxic and harmful to the environment. Overall, the document appears to be written as a political tool with a well defined goal and endpoint rather than a scientific research document. Risk has also not been addressed.</p> <p>I spent a considerable amount of time reviewing the Plan. I actually have comments on almost every page; however, I am only including a few significant comments on each of the main topics.</p>
2	General and Informative	<p>A portion of this Plan appears to address hunting, which is a very small portion of the shooting sports world. This is evident in the sections where the financial aspects of using lead in sporting ammunition (to include bullets and shot) versus the alternatives to using lead (more on this later).</p> <p>The Plan appears to have been written by people that are not familiar with hunting and the shooting sports. The reality is that many hunters may only expend one or two rounds (cartridges) during the entire hunting season. If one actually uses the statistics presented by either the Federal or State Fish and Wildlife agencies, only 5% to 20% of hunters are generally successful. This figure varies greatly with the species of game hunted and the actual geographical area where the hunt takes place. I mentioned the percentage just as a general, probably realistic, statistic to make some point in these comments. Again, that leaves anywhere from 80% to 95% of hunters who probably never fire a shot out in the field during the hunting season. Again, the reality of the hunting scenario is that very little lead is actually entering the environment due to hunting. Lead is no longer used in hunting waterfowl or upland birds in selected areas.</p> <p>This leaves the other use of lead that is prevalent in the shooting sports community and that is target shooting. Most shooters, including most hunters, are recreational target shooters. Other shooting situations where large amounts of ammunition are</p>

		<p>expended consist of law enforcement, military, and other professional (non-recreational) shooting. Most target shooters these days shoot at established shooting ranges. There are those that still shoot at non-established or undeveloped ranges such as gravel pits, however, those places are rapidly disappearing due to land development and restrictions. Personally, I would like to see all target shooting take place at established ranges but, I will leave those comments for another day.</p> <p>Law enforcement and military shooting/training uses a large amount of ammunition. Shooters in these professions require an extensive amount of practice and the cost of ammunition is a significant factor. Developments are being made towards non-toxic specialty ammunition; however, that ammunition is not yet available and not designed for civilian sporting purposes. I will not dwell on these professions as I am limiting my discussion on sport shooting.</p> <p>Recreational target shooting is an extremely popular sport and has been since the development of black powder and firearms about 600 years ago. Shooters are very passionate about their sport and spend a lot of time at the range, preparing for hunting and shooting events, and target shooting in general. The typical target shooter using a rifle or pistol may easily shoot several hundred rounds of ammunition during a day at the range. Recreational target shooters may go to the range weekly or several times a month to engage in their sport. A large amount of ammunition is expended in recreational rifle and pistol target shooting.</p> <p>Recreational shooters who choose to shoot with shotguns make up for a very large percentage of target shooters. They also use a great deal of lead. Trap and skeet shooting is an extremely popular sport among shooters from all professions and groups of people. A typical trap and/or skeet shooter may easily shoot 100 to 1000 rounds (or more) of ammunition during a day at the range or, during a competition.</p> <p>The background of recreational shooters covers every lifestyle, sex, age, education, job, economic status, etc that there is. It is my observation, however, that many of the shooters live within a middle class economic background and are not what one would refer to as being filthy rich.</p> <p>Overall, the Plan does not take accurately take into account the number of recreational (non-hunting) shooters. The Plan uses statistics from F&W regarding sales of ammunition and hunting licenses as a basis for determining the numbers of shooters and quantities of lead expended. The F&W data also appears to be used in the Plan for determining the financial costs incurred by hunters. The Plan does not take into account the fact that a great many shooters (both hunters and target shooters) that expend large amounts of ammunition re-load (hand load) their own ammunition. This is because the current cost of factory loaded ammunition is extremely high. Hand loading is also a very popular hobby. The cost of ammunition is very significant when one considers that a lead bullet (or lead shot in a shotgun cartridge) costs pennies per round versus dollars per round for a lead alternative. Lead alternatives are extremely expensive; do not always exhibit the same desired ballistic characteristics.</p> <p>The state should also consider the financial effects of banning lead from sport shooting. All sporting equipment purchased for hunting, target shooting, archery, etc is subject to taxes. The state gains many millions of dollars in tax revenue from the shooting sports. In addition to state and local taxes, there are taxes based on the Pittman-Robertson Act (Federal Aid in Wildlife Restoration Act). Revenues from this tax support habitat restoration and rehabilitation. A ban in lead within the shooting sports would effectively curtail much recreational target shooting. As such, a loss in revenues from taxes would have to be made up from other sources. More</p>
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		so than a loss in tax revenues would be the loss that private business would experience.
3	Risk	<p>Risk. The Plan discusses effects of lead and the pathways that lead can enter the environment and human body. I am not disagreeing with the toxic properties of lead. I am disagreeing with the fact that the Plan addresses all forms of lead as having the same risk to do harm to the body or environment. Again, lead shot used for waterfowl in and around wetlands and selected upland areas has been eliminated. I have not seen a risk analysis of what the risk would be for the minimal amount of lead introduced to the environment due to current hunting practices.</p> <p>Shooting ranges all over the country are voluntarily doing lead abatement and cleanup. This has not been addressed or even considered. Lead shot is a valuable commodity considering the high price of lead these days. Many ranges, if not most, are already incorporating lead recovery plans. In these ranges, the lead is mined every X number of years and is recycled (sold as valuable metal or remade into shot). The Plan does address the physical characteristics of lead regarding mobility in soils. It does address the actual low leachability of lead and other properties that reduce risk but, does not state that risks are low.</p>
4	Page xi	You state that eliminating lead is the best way to reduce lead exposure. Eliminating lead is not necessarily the only way to reduce lead exposure. First, most harmful lead sources have already been eliminated. The Plan discusses this in great detail. This document, however, is very cloudy all the way through in differentiating between lead sources that have been eliminated and existing sources of lead (this is one of the emotional aspects of the document obviously incorporated to affect the opinion of the intended readers).
5	Page xii	Phasing out products that use lead. There are no currently inexpensive alternatives to lead for sporting purposes. A great many firearms currently in use are old and not designed to use steel or non-lead shot. Not only would sportsmen have to resort to extremely expensive ammunition, they would have to replace their guns as well.
7	General, page 3, 4	Soil absorption of lead. Lead has a very low mobility in soils. Elemental lead is basically insoluble in water and it leaches at a very low rate. It is also resistant to chemical attack by oxygen and other chemicals and the oxidation also protects and lowers attack and potential for leaching. This should be considered and extensively evaluated before you propose to ban lead (I know, your Focus Sheets now say that there is no proposed lead ban, however, the intent is obvious). I use the word “ban” because that is the ultimate goal of the Department (there is little difference between the terms “ban” and “voluntarily phase out”).
8	General, page 8	Lead and lead compounds are often used interchangeably in the Plan. Again, there is a big difference in the potential harmful properties of the various forms of lead.
9	Page 12	Out-of-state sources of lead. Is a ban of products containing lead coming in from out of state sources being considered at this time? That will have a serious impact on sportsmen. I will not even attempt to address other uses of lead (batteries, etc) here.
10	Chapter III	This chapter addresses lead in the environment. Again, this Plan does a poor job of differentiating between the various types of lead that have contaminated the environment in the past and the current forms of lead being used and entering the environment. It does not differentiate between elemental lead (hunting, fishing, etc) as opposed to discharges of lead based chemicals that are highly soluble and mobile. Again, the Plan likes to just address “lead.” The emotional factor is a strong in this chapter. There is a liberal use of adjectives such as “toxic, harmful, etc before the use of the word “lead” throughout this chapter where such terms may actually be speculation when considering risk. When discussing exposure, the type of lead is very important and it is not addressed very well.

11	Page 23	Lead does not tend to migrate through the soils. I agree that the chemical nature of the soils and pH of the rain does have an effect on leaching but, lead locks up early in the soil column. Again, the risk of a hunting bullet leaching and plant uptake of the lead presents a very low risk. Metallic lead at shooting ranges stays near the surface where it can be effectively mined and reclaimed. The risk of lead being harmful to humans and the environment at shooting ranges is very minimal. The very nature of shooting ranges with the high noise factor tends to reduce the amount of game using the range for bedding or foraging purposes. Ranges are also kept devoid of grasses and brush in firing lines and shot fallout areas. No cover and forage is available for animals. The same goes for children playing in the areas where lead is concentrated. I know of no one that lets their children play in the line of fire or lead fall-out zones at shooting ranges! Lead in the air can be an issue in enclosed ranges that do not have sufficient ventilation systems.
12	Page 38	Reducing exposure. Good points here! Outreach and education is crucial to lead abatement and minimization. A ban of the product in all forms is not necessarily the only avenue to reduce lead contamination or exposure.
13	Page 49 and on	Lead in the Food Chain. There appears to be speculation here without hard data. I have not seen anything convincing in this section that correlates elemental lead from bullets and shot with plant uptake. Lead does not tend to leach and oxidation reduces leaching. I will agree that ingesting lead in any form is not healthy for any living organism. Perhaps a risk analyses ought to be done to determine what the chances are that an animal will eat that particular plant that grows over a bullet imbedded in the soil. Recall that lead shot is already banned in most hunting situations (and many hunters have already voluntarily switched to alternative shot in other situations because one will often hunt waterfowl and upland birds on the same hunting trip).
12	Page 98	Fishing, Hunting, and Shooting. Again, it is very evident that an accurate analysis of hunting and shooting practices was not performed by the authors of the Plan. It would have been very advantageous of the team to have shooting (and fishing) sportsmen on the team when writing this Plan. I would strongly recommend that the National Rifle Association review the document along with ammunition manufactures. They have accurate laboratory testing and analyses of lead contamination in soils and groundwater. I have discussed the issue of lead migration and leaching through soils with Dr. Jim Persoon from the Federal Ammunition Company. The risk factor is extremely low.
13	Page 100	Ammunition. The statement that large die-offs of hundreds and thousands of waterfowl appears to be highly speculative. No data as to the source of the lead poisoning is presented however, it is hinted that it may be due to lead shot. Again, this appears to be a calculated (emotionally derived) attack on hunting. I tend to doubt very much that lead shot existed in the environment during the late 1800's in the quantities insinuated that it caused massive die-offs of birds to the extent insinuated. Again, speculation and not fact is apparent in this section. Same goes for the deaths of "more than a million ducks." Recall, however, that the lead shot is banned and no longer used in waterfowl hunting and many upland hunting situations. Lead poisoning of waterfowl should not be an issue in this Plan if lead shot is no longer being put into the environment in wetland areas. Again, this is an issue in the Plan where it does not differentiate between lead of all forms introduced into the environment in the past and the fact that the lead is no longer being introduced into the environment.
14	Page 101	Ammunition section. The 3 Golden Eagles that died of high levels of lead should not be even considered in this report. The source of lead was unknown. This is an example of the poor science in this Plan. Such information is strictly speculation and not proven to be related to ammunition or hunting purposes. The lead poisoning presented for the 10 bald eagles is another example of what appears to be poor science. The Plan says 10 eagles were fed lead shot and in time, all died. How much shot were they fed? Were they fed one #8 pellet or one ounce of lead? Was

		the lead fed to the eagles in large quantities over time, all at once, or what? For all I can figure out, the birds may have been fed a 1-pound chunk of lead and the poor birds choked to death!
15	Page 101	Metal fragments. You really should distinguish between lead fragments and copper (or other metal) fragments that are found in the wound canal. I have seen a lot of literature from pro-hunting and anti-hunting groups on the subject of lead in dead animals. Most of the data from anti-hunting groups tends to support the false assumption that the entire carcass is contaminated with lead when in fact; only the wound canal may measurable amounts of lead. I have not had the opportunity or the time to review your references.
16	Page 105	You do not take into account that many hunters use non-toxic shot when hunting upland birds as well as waterfowl. Also, many upland hunting areas are now designated lead free. Again, it is very evident that the Plan was prepared by non-shooting sportsmen. I cannot determine where you got the information that assumes an average of "6 shots per animal" for bird hunting when probably 99% of all shotguns used in hunting situations have a magazine plug limiting the number of available shots to a maximum of 3! Also, many hunters hunt with shotguns capable of only holding 1 or 2 rounds. This is really poor science.
17	Page 232	Recommendation #9. Again, lead shotgun shot is already banned in all waterfowl hunting situations. It is voluntarily not used in many other situations. Lead shot in wetlands is existing and not being added to. Lead shot in target shooting situations has a very low risk of doing any harm. Recovery of lead shot at ranges is also financially beneficial to the shooting range. The shot is often being recovered. There are no cost effective alternatives to lead shot at most shooting ranges at this time. Furthermore, a risk analysis should be performed prior to eliminating lead shot at shooting ranges. A high risk (harmful risk) probably does not exist.
18	Page 235	The recommendation to shift lead shot to alternative shot would be a lot more than the \$13 million proposed. Many of the firearms in existence cannot handle steel shot or some of the other alternatives. In this case, the shooters will have to purchase new firearms and associated equipment designed for the new harder metal alloys.
19	Page 252	Costs. The information presented is not true or accurate. As I mentioned earlier, most hunters will expect to shoot a couple of rounds during a hunting season. It is the target shooting that both the hunter and target shooter engage in that creates the high cost in shooting. Many hunters will shoot numerous boxes of ammunition prior to hunting to sight in their guns and gain practice and experience (admittedly, some hunters will not practice but, I feel they are a big minority of hunters). F&W license data and harvest tickets will not account for this. Ammunition sales will also not account for all expenses as many shooters hand load. Shooting is a very popular sport and it is not just about hunting. Most shooters are very passionate about their sport and hobby. Again, many shooters are hand loaders and the data presented in the Plan does not take that into consideration. You need to take into account that there are probably more recreational target shooters than hunters. There may not be any statistics to provide the numbers of target shooters.
20	General Wrap Up Comments	I apologize if I have insulted any of the authors of the Plan. It was not my intention to do that. There are some serious problems with this Plan that I felt needed to be brought to the attention of the authors. First, all lead is not the same. Metallic lead should be treated differently from other lead compounds. They have far different chemical and physical properties. Again, I am very cognizant that metallic lead is also very toxic. Overall, this Plan is very much based on emotion and speculation. Many of the items presented are not based on solid fact or good science. I have not had the time to review the references that were used to prepare the document but, some of the few I have looked at were also based on emotion and speculation. Some references that I admit I have not researched appear to have been prepared by special interest groups that are anti-hunting inclined. I take their input to be very biased and not necessarily true and accurate. I will accept that perhaps you might consider documents from the NRA to be equally biased. Both sides should be considered and

		<p>the data scrutinized prior to consideration. I sincerely hope that the authors accept these comments in the constructive spirit that they are presented. I am a sportsman as well as a scientist and environmental regulator and I am passionate about my sport. I do not want to see a wonderful sport enjoyed by millions of people jeopardized by some poor science and lack of scientific data or on an emotional speculative basis. I also do not want to see a great sport jeopardized by recommendations used to support politics.</p>
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From: Dave Baalman
Sent: Thursday, October 02, 2008 11:16:12 PM
To: Davies, Holly (ECY)
Subject: Washington State Lead Ban

The proposed ban on lead wheel weights and lead ammunition in Washington State is ridiculous. It is obvious that the Department of Ecology's desire to be "green" and to align our state with California has trumped any common sense or any understanding of economics. The exposure from lead wheel weights and lead projectiles can be nothing but trivial, especially when you consider that these are relatively large objects that are not inhaled or ingested. The exposure caused by inhalation of lead dust, which remains from 70 or more years of burning leaded gasoline is considerably higher, and more of a concern. The fact is that lead wheel weights rarely fall off, instead they are removed and recycled when you get new tires. Lead projectiles are of no concern either. There is already a ban on lead bird shot for many areas and many types of hunting. This ban was warranted because in waterfowl hunting, large amounts of shot tend to fall in the same area, where fish feed and do ingest the bird shot. Areas that do not currently have a lead shot ban do not need one. These areas are not conducive to the type of hunting where shot falls on the same area over and over, so the concentration of the shot is minimal. As for firing ranges and gun clubs, the lead is periodically cleaned up and recycled. There is no viable alternative to lead projectiles, and the cost to Washington gun owners would be tremendous, with no value to the citizens of the state.

Use your common sense instead of blindly following California.

David P. Baalman

From: connie bachman
Sent: Thursday, September 18, 2008 12:53:01 PM
To: Davies, Holly (ECY)
CC: rogb
Subject: Lead

Dear Holly,

I am a Wa. State citizen and opposed to the banning of Lead. This will unfairly harm outdoors enthusiasts, and is a back door ban on firearms. This will also hurt state revenues, and affect the game dept. which receives a large share of it's funding from sales. Lastly, the game animals and non-game animals are managed by the same funding source, should it be affected, could adversely harm wildlife.

Sincerely,

Roger Bachman

Maple Valley, Wa. 98038

From: Roger Bachman
Sent: Thursday, September 18, 2008 1:26:02 PM
To: Davies, Holly (ECY)
CC: Roger Bachman
Subject: Lead Ban comments

Dear Holly,

I am opposed to the potential banning of lead use in Washington State. As a lifetime resident, I believe it will adversely affect Wildlife due to funding sources related to Hunting related equipment sales. I also feel this is a back door ban on hunting and an infringement of my 2nd Amendment Right, as any substitutes would be excessively expensive and reduce my ability to practice with firearms and remain adequately trained to deal with threats should they arise. The claim that wheel weights are flying off vehicles and entering the water supply is exaggerated. They are designed to stay on wheels with centrifugal force. I really doubt a couple hundred pounds on the roads can do any harm. To believe we as humans can really affect the earth so much is silly. Yes, we are to be good stewards, but we are at the top of the food chain, not the bottom.

Please worship the Creator, not the created.

Sincerely,

Roger Bachman

Lifetime Wa. Resident

From: Frank I Backus, MD
Sent: Monday, October 06, 2008 5:51:58 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Frank I Backus, MD
12737 20th Avenue NE
Seattle, WA 98125-4118

From: Wally B
Sent: Thursday, September 18, 2008 6:09:53 AM
To: Davies, Holly (ECY)
Subject: Lead ammunition ban

Dear Holly Davis;

There is no adequate substitute for lead ammunition and any affect on humans and wildlife do not justify a ban as recommended by your Department of Ecology. I urge you not to ban lead ammunition for target and competitive shooting.

Please, also consider the negative financial impact banning lead ammunition will have on the sporting goods industry within the State of Washington. Jobs and sales of all firearms and accessory items will be adversely affected.

Sincerely, Wallace Bacon

From: fbaier502@aol.com
Sent: Sunday, September 28, 2008 9:47:22 PM
To: Davies, Holly (ECY)
Subject: (no subject)

This is unmitigated bullshit. The small amount of lead used in sport hunting and target practice is negligible. Find something else to do to keep your job. Get off the back of the taxpaying public. Fred C. Baier

Looking for simple solutions to your real-life financial challenges? [Check out WalletPop for the latest news and information, tips and calculators.](#)

From: Steve Baima
Sent: Tuesday, September 23, 2008 12:41:32 AM
To: Davies, Holly (ECY)
Subject: Lead Ban and Chemical Action Plan

Dear Ms. Davis.

Following the sinking of the cruise ship Lusitania in May of 1915, The Captain of that ship stated that government exists solely for itself, rather than for the people, when he was prosecuted for allowing a German U-boat to sink his cruise liner. In my 60 plus years, I have seen an evolution of government that indeed exists solely for itself, rather than for the people that it represents. I understand that the objective of your position is to develop a case which will justify the total ban of lead in the environment.

Please consider the situations where there is no suitable substitute! I participate in the sport of black powder shooting. Many of our participants hunt as well. I am not speaking of a 21st century technological sport where the rifles being used are employing the same methods and materials as modern firearms. No - most of us are using rifles that are very primitive in design and function and are based upon the technologies of the 17 and 18 hundreds. They rely upon the expansion of the lead within the rifle (pistol) barrel to create the required pressure to achieve their required velocities.

Other than a few lucky hunters each year, most of the lead is deposited within a sand berm on outdoor rifle ranges - these by their very nature are not a safe environment for the public. In essence, these ranges could be classified as an outdoor repository for the lead products and thus exempt from any legislation that you are proposing.

We don't live in a perfect world, where everything is absolute. Please take the time to consider this response and craft your rules accordingly. Our use of our lead is no safety hazard to the public. Thank you for considering this opinion.

Steve A. Baima
Cascade Mountain Men
Secretary

From: Larry Baker Jr.
Sent: Tuesday, September 30, 2008 8:47:00 AM
To: Davies, Holly (ECY)
Subject: lead ban

Lead comes from mother earth and you plan to ban it..... amazing.....

From: GLENN BALDWIN

Sent: Saturday, September 20, 2008 9:24:48 AM

To: Davies, Holly (ECY)

Subject: Lead bullet ban

I do not support a ban on using lead bullets for target and general hunting -

Glenn Baldwin

2622 S. Corbin Circle

Greenacres, WA 99016

From: Scrappy@comcast.net
Sent: Monday, September 22, 2008 10:24:49 AM
To: Davies, Holly (ECY); Davies, Holly (ECY)
Subject: Lead Ban

Good Day. This e-mail is being sent to you to let you know that I and a lot of other people are opposed to this ban on lead ammunition. This is (and after reading results from Ca.) ineffective and just a politicly correct piece of work. It's sole purpose is to regulate our rights into legal oblivion. Thank you for your time and I hope you will look at all sides of this issue. Sincerely, Paul R. Bammert

From: Leigh Bangs
Sent: Friday, October 03, 2008 1:57:09 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Leigh Bangs
4314 193rd Ave SE
Issaquah, WA 98027

(425) 957-9733

From: Ron Barchi
Sent: Thursday, September 18, 2008 10:28:32 AM
To: Davies, Holly (ECY)
Subject: Lead Ammunition

I would like to voice my opposition to banning lead ammunition for the shooting sports within Washington state.

Ron Barchi
Maple Valley, Wa

From: Gayle Barnes
Sent: Saturday, September 20, 2008 8:42:58 AM
To: Davies, Holly (ECY)
Subject: LeadCAP

Ms. Davies,

I have read through your department's proposals regarding the regulation of lead in the State of Washington. While I laud your efforts at trying to make life safer for all of us, I believe some of the suggested actions in your LeadCAP are overreaching. The estimates you have based your proposals on seem very inflated and the costs of implementing the changes you propose in "Recommendation #9" are not justified by the supposed effects on humans and wildlife. I am especially disturbed by the suggestion to ban all use of lead shot in shotguns. Not only do I believe such a ban is not warranted, but the cost to shooters (trap in particular) and upland bird hunters will be onerous. In addition the current substitutes for lead shot are not as effective and accurate as the longstanding product, lead. There are very good reasons why lead has been used in firearm projectiles for hundreds of years....it is reasonably priced and it performs well.

Efforts to make ammunition expensive and hard to find are just part of an overall plan to eventually eliminate the use of firearms by the public in my opinion. "If you can't convince the Supreme Court of the US to restrict our second amendment rights, make it too expensive and difficult for the average individual to use guns." That's the way it looks to me

Please take my comments into consideration,

Howard Barnes
Yakima, WA

From: Barnes Sgt Peter A
Sent: Friday, September 26, 2008 1:19:08 AM
To: Davies, Holly (ECY)
Subject: RE: Focus on Lead Ammunition

Attachments: SMIME.txt

Mrs. Davies,

I am writing in regards to your update of the Lead CAP, and how it regards to ammunition in conventional firearms. In the update to the CAP, it is stated, "Non-toxic alternatives to lead ammunition are now available in most places. Ecology favors a voluntary, educational approach to promoting their use." I am a small arms repairman and marksman for the Marine Corps. It has been not only practical, but required under the Geneva Convention, that we use certain types of ammunition, mainly fully-jacketed lead (a lead projectile that is enclosed on all sides by copper) round, often referred to as "full metal jacket." Many variations of this round exist, all using a lead core for the majority of the mass of the round.

In terms of marksmanship and the ability to transfer kinetic energy to the target, lead is an excellent metal as it is soft enough (along with the copper jacket) to be molded into the weapon's rifling without causing over pressurization in the chamber or undue heat. If a solid steel projectile is used, a plastic casing on the outside of the projectile must be used with higher power munitions to prevent weapons failure. This is known as a Saboted round, and has very limited uses for the average shooter or hunter.

Lead, as it impacts a flesh target, expands and often fragments, transferring it's kinetic energy into the target itself. This is what will ultimately cause major tissue damage to the target. If a round passes through a target without this expansion (as steel has a tendency to do) the target will most often survive with minimal tissue damage unless the round struck a nerve center or bounced off of a bone. This is why, by the Geneva Convention, sabot rounds are restricted to armored targets and not commonly used in an anti-personnel role.

The most commonly found materials that expand and behave ballistically like lead are few and expensive, and although some cheaper variants are available, their long range accuracy and stability are a far cry from lead. In addition, modern firearms are designed around a lead projectile of a specific weight and size. If either of these variables are changed, the zero (where the impact of the round is versus the sight alignment) will also change, often drastically. If the weight of the round increases with the same powder charge, both the velocity of the round and the trajectory of the round will change. To keep the same velocity with a heavier round, more charge must be added to the shell, which will increase chamber pressure, and exert more recoil upon the shooter. If the

weapon cannot tolerate the extra powder charge, it will either have to be used with an inferior velocity and range or not used at all.

So I ask, Mrs. Davies, while there are alternative rounds, how are they even close to equal with the lead that we use today (and will continue to use throughout the military), and how is that economic or practical for the hunter or shooter?

Sgt P. A. Barnes
"P" Battery 5/14
Spokane, WA
(509) 990-8454

From: Chase Barton
Sent: Thursday, October 02, 2008 9:00:58 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Chase Barton
133 N 50th St
Seattle, WA 98103

(206) 910-4403

From: Beaux Bartron

Sent: Saturday, October 04, 2008 7:11:34 AM

To: Davies, Holly (ECY)

Subject: Lead Ammo Ban Comment

Dear Sirs,

As a lifelong gun owner I have to oppose the proposed ban on lead ammunition and would hope that you would do the same.

There is no substitute adequate to replace lead ammunition for either hunting or sport shooting and the amount of lead deposited by both is insignificant.

I would hope that you show a measured and reasonable rationale in your decision.

Sincerely,

Beaux R Bartron
8030 213th St SW
Edmonds Wa 98026

From: LBaum43@aol.com
Sent: Thursday, September 18, 2008 4:55:42 AM
To: Davies, Holly (ECY)
Subject: Lead Ban

I feel the lead ban for hunting ammunition is outrageous. There is little damage caused by the use of lead in big game bullets plus a suitable substitute is way too expensive and not as effective. Larry Baum 425-747-3065

Pssst...Have you heard the news? [There's a new fashion blog, plus the latest fall trends and hair styles at StyleList.com.](#)

From: Gil Bayless
Sent: Friday, September 12, 2008 2:57:43 AM
To: Davies, Holly (ECY)
Subject: Public Meeting on Lead

Holly~

If we initiate an attempt to remove lead from our lives, won't this mean that many of our legislature will be removed? Who said that they had lead in their butts? There is a way to remove and neutralize lead in our bodies. It's not with chelation therapy either! That method has not been perfected. However there is a safe method to remove existing body levels!

Aloha, Gil

From: Randall Bayuk
Sent: Wednesday, September 24, 2008 3:21:42 PM
To: Davies, Holly (ECY)
Subject: RE: Focus on Lead Ammunition

Holly,

Thank you for the response. I understand that the CAP does not explicitly call for a ban on ammunition. But the CAP and the focus sheet reference the national ban on the use of lead shot for waterfowl and the extended bans in place in Washington. A discussion of successful bans tends to make one believe that the CAP would eventually result in a ban on lead based ammunition.

The focus sheet and the CAP also states that there are alternatives to lead based ammunition. This may be true for the sport hunter or bird hunter that shoots very little throughout the year. Big game hunters rarely shoot more than a box of ammunition per year. But practical pistol shooters (of which I am one), trap and skeet shooters, steel silhouette shooters and other disciplines shoot thousands of rounds per year. The few alternatives available are very expensive and in short supply.

I will agree, however, that if a viable alternative were to become available, it would be popular with shooters. I'll give a fairly recent example from my own sport. There had been traditionally two types of pistol bullets available: jacketed and lead. The jacketed were cleaner shooting but expensive and the lead core was exposed at the base of the bullet. The lead bullets were difficult to clean afterwards and exposed one to the lead during reloading and handling the ammunition. In the past 5 years or so, plated bullets appeared on the scene. These are lead core bullets that have a pure copper jacket adhered to them. The lead is completely covered. The plated bullets have become very popular as the makers have improved their quality, performance and pricing has become competitive. Of the group I shoot with, the vast majority shoot with these plated "lead free" bullets. They greatly reduce one's exposure to lead in handling. Once the bullets are fired and if the bullet disintegrates on contact, the lead is released but not before then.

As with the plated bullets, if a viable alternative was commercially available that was competitive on price and performance I am sure it would catch on. I just don't want to see it catch on just because lead based bullets were banned by legislation or regulation.

I do want to thank you for your efforts. I hope I am able to be a positive and reasonable voice in the discussion to help identify solutions that benefit everyone involved. It does appear that your team is attempting to do so also.

Randy Bayuk

From: Davies, Holly (ECY) [mailto:hdav461@ECY.WA.GOV]
Sent: Tuesday, September 23, 2008 8:52 AM
To: Randall Bayuk
Subject: RE: Focus on Lead Ammunition

Thank you for sending in your comments on the Draft Lead CAP. There is no proposed ban on lead bullets or other ammunition in the Draft Lead CAP. We would like to work with hunters and shooters to promote non-toxic alternatives to lead without negatively affecting hunting or shooting areas.

You made several points that are why we did not recommend a ban on any ammunition and why we are focusing on exposures to children.

Please take a look at the focus sheet we prepared about lead ammunition and the Draft Lead CAP. I've attached the fact sheet to this email or you can access it at:

<http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/>

Sincerely,

Holly Davies, PhD
Chemical Action Plan Developer
SWFAP/ Industrial
WA Department of Ecology
PO Box 47600
Olympia, WA 98504-7600
Phone: 360.407.7398
Fax: 360.407.6102

From: Randall Bayuk [mailto:randybayuk@charter.net]

Sent: Monday, September 22, 2008 9:53 PM

To: Davies, Holly (ECY)

Subject: Focus on Lead Ammunition

Hello,

I read through much of the 335 document on the lead chemical action plan.

This regulation would eliminate my sport of practical pistol shooting. Despite what the plan contains, there is not a practical, economic replacement for lead core pistol bullets. Most shooters use a fully jacketed or plated lead core bullet. Even a casual shooter in the sport shoots 300 – 500 rounds per month. A serious shooter much more than that. A comparison of like bullets on a popular shooting supply website has Barnes XPB Lead Free bullets at \$18 / 20 or \$.90 per bullet and a comparable copper plated lead core bullet at \$15 / 100 or \$.15 per bullet. That is a 500% change in cost.

I also looked at the list of stakeholder representatives. There was no one represented there from the shooting or hunting sports. The only recreation member was for a west side fishing club.

I don't believe lead should be common in daily exposure environments, such as in the home in fixtures, in plumbing and other areas where consumption can occur. But a modern, clean firing range isn't an area likely to result in much exposure to human consumption nor is it a place for widespread animal exposure. I think this regulation would go too far and restrict too many activities. I've focused on my own personal preference but there are others. This is an example of over-regulation.

Thank you,

Randy Bayuk
7009 W. 8th Ave
Kennewick, WA 99336

From: Travis Beck
Sent: Saturday, September 27, 2008 6:08:43 AM
To: Davies, Holly (ECY)
Subject: Draft Lead CAP for public comment

Holly,

I have a couple of comments on the Lead Chemical Action Plan submitted by the Washington State Department of Ecology, particularly in the area of lead used in ammunition.

1. The use of lead in rifle ammunition. The CAP states that lead ammunition increases the lead concentration in venison. I found an article in American Hunter (July 2008) that refuted these claims. Iowa Department of Natural Resources conducted a study on venison donated to food banks. This was performed to refute a study performed by the North Dakota Department of Health. While the North Dakota study showed a range of concentrations, the validity of the survey is questionable. The Iowa study showed no to insignificant levels of lead in their venison. The Iowa health department has also tested people for lead poisoning since 1992 and has never had a case of lead poisoning attributed to eating wild game. I believe the information provided in the Cap is incorrect and additional surveys should be performed.
2. The use of lead shot on upland game. I have not seen any scientific publications of upland birds dying from lead poisoning. I am not entirely opposed to the use of steel shot for upland birds, but I feel that information should be provided that shows the trends you claim. Unlike waterfowl, I do not believe lead has an impact on upland birds.
3. The use of lead ammunition on gun ranges. I am an active trapshooting, shooting thousands of rounds a year for recreation. The use of steel would be detrimental to the sport in many ways, mainly cost. I have not seen any scientific publications on the hazards to the environment. Shotgun ranges (where I frequent) also reclaim the shot to re-use, eliminating high buildup.

Overall I agree that lead is a hazardous component, being a chemical engineer I understand the need for proper protection. I feel that this CAP has gone overboard with the regulations. I have eaten wild game and been around firearms my entire life and do not have lead poisoning. I know multiple people that have also engaged in the same activities and never have had an illness attributed to lead. I would like to see the lead ammunition ban stricken from the CAP, and if not provide a scientific basis behind the claims. If you have any questions regarding my comments I can be reached at tbeck2b@charter.net.

Thank you for your time,

Travis Beck

From: Bell, Jeffrey

Sent: Saturday, September 27, 2008 8:07:44 AM

To: Davies, Holly (ECY)

Subject: Focus on Lead Ammunition – Update on the Lead Chemical Action Plan:
Lead Ammunition

I am strongly opposed to the section on banning lead ammunition for rifles and handguns. Even in your report there are no instances where the ammunition for rifles and handguns has been ingested and caused any ill effects for either animals in the wild or humans. You can't even say the real amount of lead from this source has been measured in the field other than a place of recreational shooting, in that case maybe you should ban target practice in non-designated areas but not ban lead ammunition outright.

This is the kind of irresponsible action that the people are sick and tired of when it comes to politicians over-reacting and trying to ban anything tied to someone's health.

Jeff Bell
Longview, WA

From: Mike Bell
Sent: Thursday, September 18, 2008 4:59:55 AM
To: Davies, Holly (ECY)
Subject: Lead Bullet Issue

Are you the persom to whom we send our comments concerning the proposed banning of lead bullets??

From: Tami

Sent: Thursday, September 18, 2008 7:28:13 AM

To: Davies, Holly (ECY)

Subject: Lead Chemical Action Plan

To whom it may concern,

I think that this proposal is absolutely ridiculous. Time would better be spent trying to lower taxes and improving and building roads. The Lead Chemical Action Plan would take away another part of our freedom.

Tamara Bell

From: Michel Bellamy
Sent: Thursday, October 02, 2008 9:02:39 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan. I am also the mother of two.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Michel Bellamy
1509 North Proctor
Tacoma, WA 98406

(253) 752-7973

From: Rick Benefiel

Sent: Monday, September 22, 2008 11:46:40 PM

To: Brian Ward; Chuck Grable; "John Mills Jr."; Mary Mills; Emma Benefiel; Lynda Lowell; Mike Lowell; Randy Smith; jsmith3570@comcast.net; Tony; Richard Benefiel

CC: Davies, Holly (ECY); kada46@ecy.wa.gov

Subject: EPA – lead bullet ban

The EPA is following suit in Washington State with California to ban "lead bullets". This would result in the elimination of legal firing ranges as well as ad-hoc gun control which would result in only criminals caring guns. They couldn't ban guns so they're doing this instead. If you don't agree with the ban of bullets, speak up.

Comments should be sent to:

Holly Davies

Dept of Ecology

P.O. Box 47600

Olympia, WA 98504-7600

Fax: (360) 407-6102



e-mail: hdav461@ecy.wa.gov

"I disagree with the legislation by the EPA to ban lead bullets"

- rick

From: Tom Bennett
Sent: Friday, September 19, 2008 6:09:37 AM
To: Davies, Holly (ECY)
Subject: Lead Ban

Gentlemen,
This is no practical replacement for lead bullets.
Do not ban them.
Thank You,
Tom

"PROUDLY MADE IN AMERICA"	"PROUDLY MADE IN AMERICA"
<p>AMSOIL DIRECT JOBBER Tom Bennett - AMSOIL DIRECT <i>AMSOIL DIRECT dealer</i></p> <p>amsoil@webband.com</p>	<p>AMSOIL, Inc. P.O. Box 48565 Spokane, WA. 99228</p> <p>tel: 509-468-0343  mobile: 509-979-4419 </p>

Add me to your address book... *Want a signature like this?*

From: Irene Bensinger
Sent: Thursday, October 02, 2008 7:32:34 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Irene Bensinger
43708 161st Avenue East
Eatonville, WA 98328

360 832 8844

From: Catherine & Michael Benson
Sent: Thursday, October 02, 2008 11:54:59 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Catherine & Michael Benson
18405 68th Ave. W.
Lynnwood, WA 98037

From: Dave
Sent: Monday, September 22, 2008 1:49:43 PM
To: Davies, Holly (ECY)
Subject: lead ban

Dear Ms Davies:

There simply is no good substitute. Please do not legislate away our right to shoot.

David Benson
dbmdod@gmail.com

From: Ashley Berg
Sent: Friday, October 03, 2008 12:58:50 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Ashley Berg
6307 221st PL SW
Mountlake Terrace, WA 98043

98043

From: Connie Berger
Sent: Thursday, September 18, 2008 8:01:46 AM
To: Davies, Holly (ECY)
Subject: Lead Ammo

Please DO NOT ban lead ammunition in Washington State or support actions to do so.

There is no adequate substitute for lead ammo when hunting.

Your thoughtful consideration to this issue in support of Washington's Hunters is appreciated.

Thank you, Garland Berger
816 NW 104th Loop, Vancouver, WA 98685 360 600-4164

From: Marilyn Berko
Sent: Monday, October 06, 2008 6:47:02 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Follow Up Flag: Follow up
Flag Status: Red

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan. I am a pediatrician in Olympia, and a mother and grandmother, and as such I am very concerned about the impact of lead and other toxins on children's health and well being.

Lead is a potent neurotoxin , which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes. Subacute lead ingestion or exposure can lead to long term cognitive difficulties, even if there are no acute manifestations.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Marilyn Berko
2720 85th Avenue SW
Suite 540

Tumwater, WA 98512

(360) 956-9425

From: Al Berlat

Sent: Tuesday, September 23, 2008 3:19:47 AM

To: Davies, Holly (ECY)

Subject: Draft lead chemical action plan

As one of almost 100 million exercisers of the Second Amendment in America and a Washington resident who participates in the shooting sports, I am in opposition to the contemplation of a ban on lead ammunition. To single out one segment of the population and in doing so, effect an huge financial burden upon them is prejudicial and without merit. Further, at a time when our nation is in terrible economic straights, the monetary burden this will place upon citizens and suppliers would cause serious political fallout greater economic malaise. Major industries of all types use lead in the manufacture of a myriad of products. In Washington State alone, there a hundreds of Thousands of men and women who participate in the shooting sports, who have invested large sums of money to have ammunition on hand for their sport. Lead has been used in America for hundreds of years in ammunition, with little effect upon the environment, as compared to other industrial uses. This has all the appearances of a backdoor effort to go around the Second Amendment and the recent Supreme Court finding in the Heller case and an attempt to deny a very large voting segment of the population their Constitutional rights, as there is no viable alternative to lead at this time. The backlash from this type of heavy handed government mandate would be far reaching and devastating. Gasoline has a far greater impact on the environment than lead used in shooting sports but I don't see any effort being put forth to ban it without a viable readily available substitute, do you!

Until a suitable readily available and competitively price alternative is made available, even the contemplation of banning lead in shooting sports is premature and burdensome on a very large segment of the population. I have notified the Governor as to my concerns and that this is something that not without prejudice given there is no provision for a viable solution to replace lead in shooting sports. In addition just what do suppose law enforcement and the military use for ammunition, rocks? Who will pay the enormous expense of exchanging out the huge stockpile of ammunition among the military, law enforcement and the citizens with the non-available alternative, the already overburdened citizens? Better yet how about the Dept. of Ecology!

From: Berriochoa, Mike V

Sent: Friday, October 03, 2008 7:36:32 AM

To: Davies, Holly (ECY)

Subject: Opposition to ban on lead ammunition in Washington State

I wish to go on record opposed to the ban on the use of lead ammunition in Washington State. There is no scientific justification for such a ban and it would result in a higher rate of wounded birds and animals because substitute ammunition is not as effective.

Thank you

Mike Berriochoa
4715 Mojave Drive
Pasco, WA 99301
509-545-0988
Berriochoa@aol.com

From: Sheila Berry
Sent: Sunday, October 05, 2008 9:00:37 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a positive and determined Lead Chemical Action Plan.

Lead is a potent neuro-toxicant, which affects children's brains even in the minute doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, it should include the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test for, disclose and eliminate these chemicals from their products and helping manufacturers identify safe alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,
Sheila Berry

Sheila Berry
1217 N 16th
Mount Vernon, WA 98273

From: Jonathan Betz-Zall
Sent: Monday, October 06, 2008 7:00:25 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

The Community Coalition for Environmental Justice, a grass-roots community organization in Seattle, supports a strong Lead Chemical Action Plan.

In the Central District and South End of Seattle, we have campaigned for years to raise public awareness of the dangers of lead to children's brains in the smallest doses. Any plan adopted by the state must aim to eliminate lead from the air we breathe, food we eat, water we drink, or products we bring into our homes.

We are encouraged by some of the recommendations in the current draft plan, but that plan will not significantly reduce lead exposure without further recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Jonathan Betz-Zall
CCEJ
1620 18th Ave, Suite 10
Seattle, WA 98122

From: Bevelresou@aol.com
Sent: Thursday, September 18, 2008 5:28:21 AM
To: Davies, Holly (ECY)
CC: Bevelresou@aol.com
Subject: BANNING OF LEAD AMMUNITION

Hello:

As a scientist, I am concerned that junk science is being used to subvert the Second Amendment of the United States Constitution. There is no credible mechanism to produce any negative effect on the environment. The incremental concentrations in the environment produced by this ban produce no detrimental effect. This is politics over science that has no credible basis.

Before such legislative requirements are enacted, a peer reviewed, scientific study needs to be performed to characterize the pathways for lead to credibly enter the ecosystem and produce a biological or ecological detriment. In addition, there is no adequate substitute for lead ammunition and that any perceived affects on humans and wildlife do not justify a ban as recommended by the Department of Ecology.

This ban is a de facto challenge of the Second Amendment.

I am very disappointed that the great State of Washington has moved in such an illogical and anti-American manner.

Regards,

Dr. Joseph John Bevelacqua, President
Bevelacqua Resources
343 Adair Drive
Richland, WA 99352
509-628-2240
bevelresou@aol.com
<http://bevelacquaresources.com>

Psssst...Have you heard the news? [There's a new fashion blog, plus the latest fall trends and hair styles at StyleList.com.](#)

From: Bob Birney
Sent: Tuesday, September 16, 2008 1:26:21 PM
To: Davies, Holly (ECY)
Subject: CAP draft response

Ms. Davies

While I find the draft report/plan extensive, it is incomplete and I am not in agreement with at least one of the plan's basis and related proposed actions. And that mentions nothing of the unacceptable growth of the both size and cost of government which would result if this plan is implemented.

In a quick browse thru the document it became OBVIOUS there is a proposed effort to ban the use of lead in sporting goods, both for fishing and hunting purposes. I find this simply and totally UNACCEPTABLE!

The case for banning lead projectiles is weak and undeveloped, relying heavily on references to actions taken in other states – not hard-core scientific facts applicable to the State of WA. There is NO discussion of or allowance for the use of lead in concentrated areas, such as trap ranges or established shooting ranges, in which this naturally occurring element become comparatively concentrated with little/no resultant adverse affects. There is also no admission the lead from primers is a greater concern than that of projectiles due to its physical size – or the fact even primer lead is only really a concern in areas which receive greater rain fall amounts than that experienced in much of the eastern part of the state. Nor is any credit given to the fact primer manufactures are VOLUNTARILY reducing the amount of lead in primers or simply removing them completely without government action.

Yet the action measures are global in that they measure only the reduction in the use of lead for all sporting purposes. This is what "us common working class folks" refer to as effectively a ban. This plan may not contain an outright ban presently, but does contain a clearly identifiable government sponsored initiative to reduce the sporting use of lead – which can be expected to migrate into an all-out ban when the voluntary reduction efforts fail to produce the desired results (as experienced in other states).

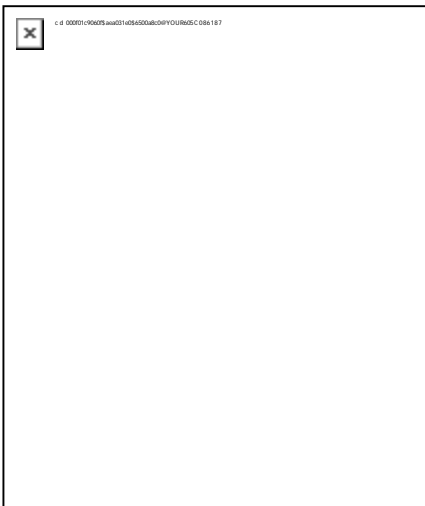
There are NO really viable alternatives for lead in the firearms industry, only poor substitutes. This report even admits the cost of using alternatives is greater than twice that of lead. While the impact range discussed starts at \$19, this \$19 could be a fatal flaw for low-income sportsman who are also having to shoulder the increased costs of energy, which affects virtually all elements of society, as well as the constantly burgeoning tax load placed on the working class. Absolutely no mention is made of the extremely poor performance of substitute metals in rifle projects, especially in my present disciplines, short and long-range precision competition – areas in which ¼" difference in impact point means the difference between 1st place and 5th (or worse).

I admire the effort to increase the safety of humans, but find the proposed actions in this plan (at least in reference to sporting purposes) is out of line with any potential benefits, the hard scientific basis is lacking, as well as the costs are prohibitive, both the costs to the agencies which would implement such plans and to the sportsman who would have to fund both their personal recreational purchases and ultimately fund the increased cost of government.

The costs and impacts of this plan to Sportsman is unacceptable IMHO while potentially making token increasing in safety over that which is happening in the sporting goods markets WITHOUT government interference today.

I reserve comment on any other areas of this report pending a much more extensive study of the proposal.

Sincerely,
Robert Birney
Richland, WA.



"The basis of conservatism is a desire for less government interference or less centralized authority or more individual freedom and this is a pretty general description also of what libertarianism is." Ronald Reagan

From: Willyb563@aol.com
Sent: Friday, September 26, 2008 1:54:41 AM
To: Davies, Holly (ECY)
Subject: Ammunitions

Dear Ms. Davies,

I am writing to offer my concerns regarding the banning of lead ammunitions. I understand that the CAP only recommends voluntary use of substitute materials, however, all states that have started with voluntary bans have then begun to endorse full bans initiatives by environmentalists.

The cost of this to sportsmen is staggering. I understand the ban on lead shot as this shot is spread indiscriminately over large wetlands and other breeding habitat, but lead bullets are not the same nor do they have much impact, except perhaps on the game sportsman eat. I know that you will argue that the NRA is wrong regarding your position, but history verifies this to a "soft landing" approach to more prohibition.

In summation, I believe this is one more camouflaged attempt at restricting the rights of legal gun owners by making gun sports too expensive and with too many prohibitions to merit the resources. You may say publicly say "this is not the intent", but I think that presumption is challenged by historic fact.

Thank you for listening.

Bill Bishop

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From: Emily Bishton
Sent: Thursday, October 02, 2008 7:46:33 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Emily Bishton
5257 39th Ave NE
Seattle, WA 98105

(206) 523-1774

From: Leslie Blount

Sent: Thursday, October 02, 2008 10:41:49 AM

To: Davies, Holly (ECY)

Subject: Lead plan

I would like to make a suggestion that instead of banning lead ammunition, that we do like CA and use lead free ammo for hunting. As far as I know no animals or humans have been adversely affected by lead ammo used in target practice or formal shooting matches.
Richard Blount

From: dena blue
Sent: Saturday, October 04, 2008 1:07:33 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

dena blue
6856 54th avenue NE
seattle, WA 98115

2069858310

From: Jeannie Boag
Sent: Friday, October 03, 2008 1:45:31 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I want to express my support for a strong Lead Chemical Action Plan.

Lead, a potent neurotoxicant, has no business being in our air, food, or water, or in products we bring into our homes.

While the current draft plan contains some encouraging recommendations, the plan needs to be much stronger and should include the following:

- ? Eliminate ALL unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of ZERO exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way. The plan should require manufacturers to test and disclose the chemicals in their products. It should also include helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Jeannie Boag
8527 137th Ave NE
Redmond, WA 98052

From: Brian Boardman
Sent: Sunday, September 21, 2008 2:15:13 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

I am voicing my concern against the potential banning of lead in hunting ammunition within the state of Washington per the draft Lead Chemical Action Plan (<http://www.ecy.wa.gov/biblio/0807009.html>). I am a hunter and fisher in the state and I already support the current rules of not using lead shot for waterfowl and I would support a similar phased in lead reduction in fishing tackle using lead weights in less than 1-2 oz. The use of non-lead shot in shotguns for upland small game and game birds would seem to be a logical however and expensive addition to the costs of hunting in Washington.

I do not, repeat do not, support a ban on lead in bullets used in hunting because your proposal does not show convincing data to show that bullets used by hunters contribute significantly to the problems this draft regulation is trying to address. There was data that estimated six (6) shotgun shot shells were expended for each game bird taken. The standard for measure of weight in bullets is the 'grain' ([http://en.wikipedia.org/wiki/Grain_\(mass\)](http://en.wikipedia.org/wiki/Grain_(mass))) The average shotgun shell uses 7/8 to 1 1/8 oz (382gr - 492gr) of shot, the average hunting bullet for most deer and elk hunters is 150-200gr per bullet and responsible capable hunters expend only one or two rounds per deer or elk. This is less than the average weight of a single shotshell, and does not warrant elimination as a source of lead contamination in Washington State.

Respectfully submitted,
Brian Boardman
Anacortes, WA

From: Wu chi
Sent: Monday, September 22, 2008 2:09:51 AM
To: Davies, Holly (ECY)
Subject: Banning Lead Ammunition

Dear Ms. Davis,

I am writing to implore to abandon the idea of banning lead ammunition in the state of Washington. This would not only create an undue financial hardship on the majority of middle-class shooters, there are really few adequate substitutes. This would be a direct impediment to people exercising their constitutional rights.

Also, I am unaware of any rigorous, peer reviewed studies that indicate a problem significant enough to take such a drastic action at this time.

Thank you for your consideration in this matter.

Joseph Bobovsky, MD

From: W LOREN BOES

Sent: Friday, September 19, 2008 12:04:23 PM

To: Davies, Holly (ECY)

Subject: Lead Chemical Action Plan

Perhaps you think that the average citizen isn't intelligent enough to see the Lead Chemical Action Plan for what it is: just another back door plan to make hunting/shooting that much more difficult and expensive to the average citizen. Isn't it interesting to note that before we had the government babysitting all of America's activities, the country seemed to get along just fine. Unfortunately, now government (in their quest for power) has decided that it is their duty to monitor each and every activity of our daily life. Does this also mean that our tax dollars will now be used to pay "environmentally friendly" ammunition for police officers?? Or won't their bullets hurt the environment? I can only hope with the upcoming elections that the people will be able to take back the power that is rightfully theirs.

W. Loren Boes
Battle Ground

From: Richard Bogar
Sent: Monday, September 29, 2008 8:36:01 AM
To: Davies, Holly (ECY)
Subject: Comments re: CAP

Ecology:

This is the lead chemical action plan (CAP). It was developed by the Washington Department of Ecology (Ecology) with the valuable help of other agencies and representatives of numerous interests across the state. The purpose of a CAP is to:

- 1) find out what the dangers of a substance are.
- 2) identify where the substance is found in the environment.
- 3) recommend ways to reduce or prevent harm from the substance.

Questions:

1-What other agencies or groups are part of CAP.

a) what are their real concerns and agendas
 - my organization has provided information that points out how different groups have used CAP to further their agendas to the detriment of my hobby namely shooting and hunting that has required casting thousands of lead bullets.

 -I have known that migratory (duck and geese do ingest shot from tidal lands for years. Examining the craw of ducks shows shot in various degrees of erosion and/or desolation. The birds showed no sign of ill health.

 * Lead shot is not allowed for water fowl hunting and hasn't been allowed for a number of years.

2-What do you propose for a mechanic to use in place of lead solder: Some older radiators are repaired using lead solder.

3-Some old engines use babbit that contains lead. So does CAP exempt or prohibit babbit bearings?

a)Boiler feed pumps at Grays Harbor Weyerhaeuser pulp mill used babbit bearings.

b)Both turbines generators at Grays Harbor Weyerhaeuser pulp mill used babbit

bearings

c) In short a huge amount of rotating equipment runs on bearings containing lead.

4-What is the real long term agenda of CAP?

5-Will manufactures stop making soldering guns?

6-The acid plant at Grays Harbor Weyerhaeuser Pulp Mill uses a great lot of lead pipe for acid transfer. Are you going to make any company that might buy the pulp mill repipe the acid plant. What would you propose to any prospective buyer as to piping.

7-Can you identify any place in the home or industry that research has shown a very dangerous and life threatening condition that would require families to vacant their home or industry to shut down?

8-What will be the effect, based on history of certain agencies or groups, causing government to bring about a ruling or law outlawing lead use in any form?

Finally I feel a threat once again from non elective governing bodies scaring the public into thinking there is a need to protect us from us. Study this if you will but stay out of life. I suspect there are a great multitude of the population that wishes the same.

Richard W. Bogar
Hoquiam, Wa.

From: Susan Boling
Sent: Thursday, October 02, 2008 7:25:37 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Susan Boling
3202 175th CT NE
Redmond, WA 98053

From: Sam Bolinger
Sent: Monday, September 22, 2008 4:31:56 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Hello,

I would like to speak out at my displeasure of this proposed plan. I feel that to ban lead based ammunition will not caused the desired effects that people need. I would like to propose that if ecologists are worried about lead poisoning of animals that we enact a plan of burying the animals or internals of field dressings into the ground. This would prevent scavengers from eating the remains.

Please consider an alternative to banning lead ammunition. You will be removing all 22 Long Rifle ammunition from the public. There are no full metal jacket alternatives to this ammunition.

Thank you,

-Sam Bolinger

From: Raymond Borbon
Sent: Sunday, September 21, 2008 4:41:48 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Lead Chemical Action Plan

Specifically Lead Ban on Ammunition

I don't believe that hunters are spreading lead into concentrated areas which would result in any negative impact upon our environment. When I shoot a critter with a rifle or pistol another critter does not eat that bullet. This isn't waterfowl. If it so doesn't mean 100 more bullets of lead are going into that same piece of soil any time soon. Last time I checked lead was on the periodic table of natural elements. Maybe we should ban cars first.

This is 100% politics.

Consider that it's only the surface area of a bullet or shot that would pollute assuming a slightly acidic environment causing very gradual corrosion. The surface area of a deformed .5 caliber bullet might dissolve into the environment is similar to the weight of about one square inch of gold leaf (about 20 grams per 1000 ten square inch sheets). This comes out to about 0.012% the of the mass of the 0.0162 kg bullet. Using a table of common densities we can see how much lead would actually pollute. These are specific gravity of lead and some likely downrange items:

Lead 11300 kg/m³
Mud 1900 kg/m³
Sand 1600 kg/m³
Water 1000 kg/m³
Turf 600 kg/m³

Let's consider water then. How much water would this one bullet pollute considering the current federal standard for public water systems is 15 parts per billion.

Therefore 0.000002 kg Pb divided by 11300 kg/m³ Pb and times 1000 kg/m³ Water times one billion over 15 to dilute is about 11.7 kg of water (just under three gallons)... and these three gallons are still fit to drink.

How many gallons does a small pond hold? Many. Consider that the big gas station in North Bend approved by the Department of Ecology each store about a million gallons of gasoline (even though situated over a water source which is to be tapped for new development here). Therefore a small pond representing a the typical range of a bullet could be represented as something like 50 yards wide, 50 yards long, and about 10 feet deep. This is about 1.7 million gallons. Assuming there is no rain and the little slightly acidic pond is never flushed this pond could take about 561000 bullets before the lead would violate federal drinking water standards.

Considering how much it rains in Washington and how few people actually shoot into the same place when hunting, it seems unlikely that we would ever reach this pollution threshold. Prove me wrong.

-Raymond Borbon
12711 NE 120th St A-11
Kirkland WA 98033
(206) 820-7233

From: Len Bordeaux
Sent: Friday, October 03, 2008 11:03:36 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Len Bordeaux
5221 Ravenna Avenue NE
Seattle, WA 98105

From: Chris Bosted
Sent: Friday, September 26, 2008 1:25:50 AM
To: Davies, Holly (ECY)
Subject: Lead Ammo Ban

I am opposed to the ban of lead ammunition. At this time there is not a suitable alternative available that can be used by most people.

My name is Chris Bosted, 6212 Buena Ct Pasco, WA 99301.

From: Mike Bowens
Sent: Friday, September 19, 2008 2:55:10 PM
To: Davies, Holly (ECY)
Subject: Lead Ammunition Public Comment

Dear Ms. Davies,

Please register me as being strongly in opposition to the proposed ban on lead ammunition in Washington State (Lead Chemical Action Plan). I am target shooter and most target shooting is confined to indoor ranges with elaborate filtering systems to extract lead vapors. With Washington weather, outdoor target shooting is seasonal and the season is short. Rifle hunters expend much less ammunition than target shooters since they only fire when they have a tag and a target. Their contribution to pollution is microscopic. Incidentally, I do not hunt and I do not support hunting.

Like most shooters, I have become suspicious of all and every attempt to impose yet another restriction on my embattered sport. We shooters are well aware that the majority of the rules and laws foisted upon us, are really politically inspired restrictions. These are aimed at making our sport less and less practical and more and more difficult to pursue. No doubt the aim of the proposed change is motivated by these same reasons. We are by far the most restricted outdoor sportsmen and the proposed Plan targets us specifically. We are also the most ecologically aware and law abiding citizens.

Best regards,

*Michael J. Bowens
Redmond, WA*

--

Mike Bowens
Tel: 425-881-2687
Cell: 425-770-0635
Email: a.falang@gmail.com

"The world is a book, and those who do not travel read only a page."
- St. Augustine-

From: Kayla Bozoti
Sent: Thursday, October 02, 2008 10:04:02 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Kayla Bozoti
26334 143 Ave SE
Suite 540
Kent, WA 98042

From: Lebjmb1@aol.com
Sent: Friday, September 19, 2008 12:21:21 PM
To: Davies, Holly (ECY)
Subject: Draft Lead Chemical Action Plan

The affects of lead on humans and animals is not a justification for banning lead ammunition. There is no substitution for lead in ammunition, and any ban of lead recommended by the Department of Ecology is not reasonable or justified.

Lyman E. Bradley
4760 South Pass Road
Sumas, WA
360-966-7339

Looking for simple solutions to your real-life financial challenges? [Check out WalletPop for the latest news and information, tips and calculators.](#)

From: Paul Brainard

Sent: Friday, September 19, 2008 9:44:14 AM

To: Davies, Holly (ECY)

Subject: Lead ammunition ban

To Whom It May Concern:

I oppose your proposed ban on lead ammunition in Washington. Please look for ways to occupy your agencies time that serve the public in meaningful ways rather than assaulting my 2nd amendment rights.

Thanks,

Paul Brainard

Taxpayer/citizen

From: j3m5b@aol.com
Sent: Saturday, September 20, 2008 6:53:07 AM
To: Davies, Holly (ECY)
Subject: Lead Ammunition Ban

I am writing you today to ask that you do not ban lead ammunition in Washington State because at the time there is no adequate substitute for lead ammunition. Any effects on humans and wildlife do not justify the ban as recommended by the Department of Ecology. I am currently a law enforcement officer and firearms instructor in this state. A ban on lead ammunition would greatly impact the law enforcement community. We have to buy the majority of our own practice ammunition and a ban would put unnecessary expense and hardship on our officers. The public we serve would not be served well by this ban.

Thank You for your time.
Joseph M. Bredstrand
j3m5b@Aol.com

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From: roberta bremson
Sent: Friday, October 03, 2008 2:57:19 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely, Roberta Bremson

Please take care and remove this extremely dangerous toxic chemical from our air, food and consumer products.
Our lungs, brains and body will thank you for it.

roberta bremson
8001 Sand Point Way N.E. #C73
Suite 540
Seattle, WA 98115

From: Lynn Brevig
Sent: Thursday, October 02, 2008 2:25:46 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Lynn Brevig
3920 N.E. 110th St.
Seattle, WA 98125

(206) 528-0186

From: Tac556

Sent: Thursday, September 18, 2008 1:20:39 PM

To: Davies, Holly (ECY)

Subject: Lead Chemical Action Plan Draft

After reviewing the portion of this plan as related to firearms ammunition, I find it is completely off base.

I am a law enforcement firearms instructor, a hunter, and shooter, and am apparently much more expert in ballistics and such matters than anyone who makes claims such as I read in this draft. To say that the lead substitutes are readily available, or provide equivalent performance, is a flat out lie. There is very good reason why the military is actually using LEAD CORE, COPPER JACKETED ammunition in vast quantities. Their eco-friendly ammo is not actually working out so well yet to replace any sizeable portion of training or duty ammunitions. Law enforcement agencies use LEAD CORE ammunition for both training and duty use- because they work correctly. Many calibers of weapons have NO lead-free substitutes at all. And the ones that do, you can expect the price to be much higher than the current ammunition that is available.

To say that of that:

"For example, in Arizona 93% of deer hunters in the California condor range that have switched to copper bullets say they perform as well or better than lead bullets on game"

Is like saying that: "93 percent of Ford truck owners say their truck is better than a Chevrolet". Duh...Why would someone use something if they didn't think it was better? Talk about trying to mislead the reader, this is completely selective information you guys are peddling.

What about all the hunters who did not switch to copper bullets? And what about the 7% who think copper bullets are not as good?

And in addition- AZ gave out free copper ammunition- no wonder some people used it for hunting! They'll go back to what is actually affordable thought when it comes to paying for it themselves.

Overall I find this draft to be poorly researched when it comes to this area of knowledge. Any attempts to ban lead ammunition will cause a huge uproar, and in addition will likely be found to be unconstitutional under WA state law, which unlike California, protects the rights of people to keep and bear arms- and that right includes ammunition.

Todd Brightbill
LaCenter WA

From: Peter Brinsek
Sent: Wednesday, October 01, 2008 1:33:22 AM
To: Davies, Holly (ECY)
Subject: Lead CAP and Lead Ammunition

Dear Ms. Davies,

Where is this going to stop. These are just two most recent issues: I now am not allowed to even wash my car on my driveway, and also lead ammo will be banned. Where are all these liberties that we're supposed to have in this country that were so proud of. They are being taken away little by little and day by day. And that's just because a few environmental extremists push another crazy idea of theirs and our Government caves in to their pressures. They latch onto fake problems and cause a mental epidemic to further their social change. They use fake science to support their agenda and most of their studies are done by people who already made a decision what the results of the study should be, even before they start on it. What is current substitute for lead ammo? Has anybody researched how much more or much less poisonous these substitutes are? What will long term effects of substitutes be? For example, steel shots also contain other metals and after shots rust out it's all released into the ground. Are we not just replacing one problem with another one.

Currently there is no adequate substitute for lead ammo. What is actually available is about three to five times more expensive than lead ammo. Performance of substitute in general is lower than that of lead. Lead ammunition should be completely excluded from the scope of the CAP. This step is essential in order to protect the future availability of ammunition commonly used for self-defense, hunting and the shooting sports in Washington State.

Any affects on humans and wildlife do not justify a ban as recommended by Department of Ecology.
Thank you for your consideration,

Peter Brinsek
1811 NE 150th Street
Vancouver, WA 98686

From: Rachel Broderhausen
Sent: Thursday, October 02, 2008 2:14:04 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Rachel Broderhausen
18408 71st Ave W
Lynnwood, WA 98037

426-778-2720

From: Christina Bronk
Sent: Thursday, October 02, 2008 11:02:46 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Christina Bronk
1219 Devon Lp NE
Suite 540
Olympia, WA 98506

From: Diane Vanden Brook
Sent: Saturday, October 04, 2008 7:30:41 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Diane Vanden Brook
16401 209th Ave. NE
Woodinville, WA 98077

(425) 814-9107

From: Dan Brower
Sent: Thursday, September 18, 2008 7:32:16 AM
To: Davies, Holly (ECY)
Subject: lead ammo

I do not want lead ammo banned.

I will sue if you try to do it.

Dan Brower

From: Elisa Brown
Sent: Thursday, September 18, 2008 12:52:22 PM
To: Davies, Holly (ECY)
Subject: Lead chemical action plan

I am against the Department of ecology's lead chemical action plan.

If it is such a good idea, let the voters of Washington decide.

From: Gary Brown

Sent: Thursday, September 18, 2008 6:44:25 PM

To: Davies, Holly (ECY)

CC: Steven Green (AS); Jason Nelson; John Magnus; David Bole; John Clark (AS SEA Inspector); Terry Endsley; Rick Migliacio

Subject: Proposed Lead ammunition Ban

Holly,

Writing to let you know my opposition to the proposed lead ammunition ban in Washington. I am an active hunter and sport/competition shooter in Pierce County. I also hunt frequently in Eastern Washington in the Yakima area.

Typically for big game hunters only one round is fired and it pretty much stays in the animal and the hunter takes the animal home. The idea that lead is left in the wild in an animal for carrion eaters is a bit far fetched. Too much effort, hard work and expense goes into a hunting trip that very few if any hunters will leave a wounded animal to die, nor be unsportsmanlike enough to do that. Pretty much the same can be said for bird hunters, myself included. What shot and bullets that do not hit an animal is so minisminuscule be statistically nil. Especially considering the huge land area that is hunted on in Washington. This doesn't even mention the few people in proportion to the general population that hunt.

Lead is one of the few alloys of metal that is suitable and affordable for hunting and sport shooting. Most of that used is expended in shooting clubs or similar venues and is recovered. Additionally, to ban lead will impose a financial hardship on retailers and sportsmen and women having to find an affordable and available substitute. If this takes place many small business will loose revenue due to hunters not making trips in Washington purchasing goods and services. Please don't forget that hunters are the only group that voluntarily had a tax levied on the equipment they buy to support animal conservation across the nation.

Thank you for reading my comments and hopefully not imposing further onerous restrictions on the real supporters and conservationists of Washington's public lands and animals.

Gary M Brown
17920 150th Ave. E.
Orting, Wa. 98360
360-893-5266

From: NealGBrown@aol.com
Sent: Monday, September 22, 2008 1:11:09 PM
To: Davies, Holly (ECY)
Subject: Draft Lead Chemical Action Plan Comments

Dear Ms. Davies,

I am writing to express my views on removing lead based ammunition specifically, and lead generally from all goods.

It is ludicrous to remove lead from the manufacture of ammunition, when it is clearly the most economical method available.

Lead is a naturally occurring element in this world, and there is no reason to be afraid of it. It is not safe of course to have lead in paint, but the metal in ammunition is not hazardous. People have had bullets and/or shot pellets within their bodies for decades with no toxicity, so being afraid of the lead is just an unfounded fear.

It is further silliness to force those who use ammunition to pay exponentially higher prices, just because you are afraid of lead in that ammunition.

Sincerely,

Neal Brown

Looking for simple solutions to your real-life financial challenges? [Check out WalletPop for the latest news and information, tips and calculators.](#)

From: Tom Brun
Sent: Thursday, September 25, 2008 8:49:43 AM
To: Davies, Holly (ECY)
Subject: Proposed lead ammo ban

I can understand a ban on use of lead ammunition for hunting purposes, but there seems to me to be absolutely no rational reason to ban its use in controlled target shooting venues where public exposure is not a concern.

Let's not "throw out the baby with the bath water"; not overreact in the urge to "protect the public".

T.M. Brun
Benton City, WA

The person who says it cannot be done should not interrupt the person doing it.....Chinese Proverb, The Graduates
Book of Wisdom

From: saharablue3@aol.com
Sent: Saturday, September 20, 2008 3:58:26 AM
To: Davies, Holly (ECY)
Subject: Ban on lead ammunition

Since there is no satisfactory substitute for lead used in ammunition I strongly urge you to reconsider this action.

Victor Buchanan
30214 4th pl sw
Federal Way, WA
98023
saharablue3@aol.com

Find phone numbers fast with the [New AOL Yellow Pages!](#)

From: B Buckwalter
Sent: Thursday, September 18, 2008 4:33:17 PM
To: Davies, Holly (ECY)
Subject: Washington State Lead Chemical Action Plan

The lead used in shot and bullets can not be replaced on a large scale as there is no substitute available to use that would be adequate. To ban the use of lead bullets would in effect be a form of gun control and restrict peoples ability to hunt, shoot and protect themselves. The use of lead for these activities is not hazardous to people or the environment. No restriction is needed.

Want to do more with Windows Live? Learn "10 hidden secrets" from Jamie. [Learn Now](#)

From: Paul Bunn
Sent: Thursday, September 18, 2008 5:02:53 AM
To: Davies, Holly (ECY)
Subject: RE: Lead shot

Thanks Holly

I did a little more research ... and to my surprise, I've found that steel shot is actually cheaper than lead! I guess the reason that steel *shells* are more expensive than lead shells is that currently there is less demand for them. If they were banned, they would through demand become cheaper than lead shells are. The only disadvantage to them then is the poorer performance profile compared to lead. This can be compensated for, by using slightly larger shot size, or slightly more powder for more energy. I really don't see any reason for the continued sale of lead shotgun shells in this state, or the country for that matter.

I'll quote from a discussion on steel shot:

"My "home" range, Naperville Sportsman's Club in Naperville, Illinois has been required to use steel shot since shortly after 2000. I'd wager a guess that our club has more real-world experience with steel shot for clay target games than anyone else - at least anyone else that we've been made aware of.

We are a trap-only facility and you will find a large selection of trap guns on the line. Browning Citori's of all varieties, BT-99's and 100's, 90-T's, KX-5's, Beretta's, Perazzi's, and Kolar's. Since shooting steel for over 5 years we haven't had one issue with steel shot thru a trap gun.

Steel shot is, at this time, way cheaper than lead. Our club has an active steel reloading program and our cost for steel shot is around \$.93 per pound. My total cost for reloading a box of 1 oz steel is around \$4, but is creeping higher as powder and primer costs increase. On the other hand, our cost for steel has not increased in 3 years. We also purchase wads in bulk to keep the price down (nearly half a million at a time).

There's no argument that steel isn't as effective as lead, especially as distance increases, but it's not nearly as ineffective as everyone would lead you to believe. "

This was taken from:

<http://www.trapshooters.com/cfpages/thread.cfm?threadid=151514>

I think you'll find that the majority of hunters and trap shooters would get on-board with a ban on lead shotshells if they understand that there will not be any increase in cost of the shells. As an avid hunter and trap shooter, I would certainly support such a move to prevent lead being distributed throughout our environment. I certainly can't condone the further distribution of a known poison, when a cheaper non-toxic version is so readily available....

One more quick anecdote

I am a member of a duck club in the Snohomish valley. We've worked with DU and other conservation groups to restore roughly 600+ acres of prime waterfowl habitat. Every member of the club respects the non-tox only rule when hunting. In an average season, I might shoot 5 boxes or so of non-toxic ammunition at waterfowl at the club. This last Saturday we set up a clay thrower and between a few friends we shot 7 or 8 boxes of shells. I insisted that we shoot steel shot, even though it would be perfectly to shoot lead. I mean -- what would the point be to honor the waterfowl restrictions, only to go out and in ONE DAY distribute enough lead throughout prime swan/duck/geese habitat of the equivalent for an ENTIRE YEAR of hunting ?

Thanks again for listening.

-----Original Message-----

From: Davies, Holly (ECY) [mailto:hdav461@ECY.WA.GOV]

Sent: Wednesday, September 17, 2008 12:39 PM

To: Paul Bunn

Subject: RE: Lead shot

Thank you for sending in your comments on the Draft Lead CAP. There is no proposed ban on lead ammunition in the Draft Lead CAP. We would like to work with hunters and shooters to promote non-toxic alternatives to lead without negatively affecting hunting or shooting areas. We agree that the cost of alternatives is an important consideration. Your comments on shooting ranges vs. open land are also important.

Please take a look at the fact sheet we prepared about lead ammunition and the Draft Lead CAP. I've attached the fact sheet to this email or you can access it at:

<http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/>

Sincerely,

Holly Davies, PhD
Chemical Action Plan Developer
SWFAP/ Industrial
WA Department of Ecology
PO Box 47600
Olympia, WA 98504-7600
Phone: 360.407.7398
Fax: 360.407.6102

-----Original Message-----

From: Paul Bunn [mailto:Paul@UltraBac.com]
Sent: Wednesday, September 17, 2008 11:42 AM
To: Davies, Holly (ECY)
Subject: Lead shot

I fully support the CAP's goal to reduce the use of lead in ammunition to prevent it from entering our environment. I would propose banning lead-shot shotgun shells with one caveat.

Non-toxic shotgun shells are over two times the price of lead, and suffer performance penalties due to their less-dense formulations (eg steel shot). In Washington there are very few ranges that a shotgun user can go to shoot. If lead were banned, the cost would force many shooters away and very likely cause the ranges to enter bankruptcy. I would therefore propose a compromise be considered; banning the sale of shotgun shells with larger than #7.5 shot. Since #7.5 or smaller is perfect for trap-shooting, the ranges would not be affected, and there is minimal impact to the environment at a range that implements a safe lead-reclaiming operation. However, #7.5 shot and smaller is *useless* on game (with the exception of dove-hunting, which is a very short season and therefore limited impact) and therefore would not be purchased by the vast majority of hunters.

This does open up the possibility of consumers purchasing #7.5 shot and then using it on private/public land for target practice. I would propose that shooting lead outside of a range be banned, only non-toxic alternatives should be allowed.

Regards
-Paul Bunn

From: MICHAEL BURGESS

Sent: Saturday, September 20, 2008 10:46:47 PM

To: Davies, Holly (ECY)

Subject: lead

You people are absolutely crazy. Lead in the oxidized form is far more dangerous than in the solid form. Lead exists all over the world in the oxide form. This gets into the water table. After it has been refined into solid form it takes many decades for it to re-oxidize. After it has been used for ammunition it is dispersed in small quantities, then oxidized. It becomes much less a problem then.

I will continue to cast and shoot my own ammunition regardless of what you say or do. You can not stop that. If I must import my lead from Mexico, I will. This is not an arena you should be involved in.

Mike Burgess

From: Bob Burkholder
Sent: Saturday, October 04, 2008 2:33:31 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Bob Burkholder
131 Madison Ave.
Bainbridge Island , WA 98110

From: Dylan Burns
Sent: Friday, September 26, 2008 4:09:35 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Dear Holly Davies,

I wanted to comment on the "Lead Chemical Action Plan" prepared by the Department of Ecology.

You need to know that there is no adequate substitute for lead ammunition and that any restrictions made to the use of lead in ammunition will only monetarily harm the sportsman of Washington state and the large sporting industry they support.

This ban should not take place.

Thank you,

Dylan Burns

From: Melissa Burns
Sent: Friday, October 03, 2008 1:31:12 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes (it's even in Christmas tree lights for goodness sakes).

Please;

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Melissa

Melissa Burns
28641 132
Kent, WA 98042

From: Scott Burns
Sent: Friday, October 03, 2008 7:36:03 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Scott Burns
810 Kiowa Trail
Suite 540
Fox Island, WA 98333

(253) 549-2998

From: DAN
Sent: Thursday, September 18, 2008 9:31:17 AM
To: Davies, Holly (ECY)
Subject: Lead Ammunition

Dear Holly Davies,

I **do not** support the proposal to ban lead ammunition. It is already banned in waterfowl hunting and there is no need.

Dan Burton
Mead, WA

From: Roberta Butler
Sent: Friday, October 03, 2008 1:03:32 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Roberta Butler
1709 30th Ave NE
Issaquah, WA 98029

(425) 213-4456

From: JOHN BYCZYNSKI

Sent: Saturday, September 27, 2008 12:29:32 PM

To: Davies, Holly (ECY); John M. Byczynski

Subject: Lead Chemical Action Plan

I am a Life Member of the NRA. I oppose any further restriction to the use of lead in ammunitions. I enjoy plinking with a 22 cal pistol and rifle. I also have Black Powder pistols and rifles. I am retired and live on a limited income so any further change in the restriction of the use of lead in ammunition can cause me to not afford to plink/target shoot. Outlawing lead in the previously mentioned weapons ammunition and other ammunitions will not produce a significant change in our states ecology. We have already banned lead use in shotgun pellets and that has had a positive effect on our ecology. I do not believe additional restrictions are necessary.

Sincerely,

John Byczynski

From: ldbtoy@bmi.net

Sent: Friday, September 26, 2008 2:05:55 AM

To: Davies, Holly (ECY)

Subject: Lead

I just read a perposal from the Department of Ecology on the banning of lead ammunition. I am a hunter and I also am a black powder shooter. I also do target shooting. If this banned is adopted it will stop hunting and target shooting as we now have. There's no adequate substitute to replace lead ammunition. I have not seen or heard of any affect on human or wildlife to justify this ban.

This is one more way for gun control, if the government can't make guns ownership illegal then make the ammunition illegal. Why dose the Department of Ecology want to destroy Washington sportsmen? After all lead comes out of the earth, Why don't they go and dig up all of the lead that is in mother earth.

With this ban Washington will lose a lot of hunters and target shooters,who buy ammunition, This will take away tax dollars from the Department of Wildlife,This department is already losing tax dollars by the constant raising of license and permits. I thought that the government was to working for the citizens not for the government.

Larry Byrne a concerned citizen of Washington

From: Scott Callan
Sent: Thursday, October 02, 2008 9:23:59 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Scott Callan
3445 Maple Terrace Drive
Suwanee, GA 30024

From: Allen Campbell

Sent: Saturday, September 27, 2008 3:00:51 AM

To: Allen Campbell; Davies, Holly (ECY); Benton.Don@leg.wa.gov;
Orcutt.Ed@leg.wa.gov; Zarelli.Joseph@leg.wa.gov

Subject: RE: Lead Chemical Action Plan

Attachments: Comments+---+CAP+draft.pdf

Holly,

I have read the entire draft and citations. The draft is instigating a ban on lead ammunition for all firearms. Hunting, shooting, and shooting sports organization would have been included in the CAP committee if there was interest in working together. The attachment illustrates some areas where the draft is clearly flawed and the base for the recommendation is fabricated. An Honest report will follow the "Actions" noted at the end of the attachment.

Please include this email string and attachments in the comments / public reactions against the draft and report.

Thank you

Allen Campbell
Vancouver, WA
360 608 4642

-----Original Message-----

>From: Allen Campbell <agc1kcc@earthlink.net>

>Sent: Sep 18, 2008 9:37 AM

>To: "Davies,Holly (ECY)" <hdav461@ECY.WA.GOV>

>Subject: RE: Lead Chemical Action Plan

>

>Holly,

>

>The link you provided is one of the sources that triggered my response.

>I can not access the

>link <http://www.ecy.wa.gov/pubs/0807053.pdf>

>

>Can you send me a copy?

>

>Thank You

>Allen

>

>-----Original Message-----

>>From: "Davies, Holly (ECY)" <hdav461@ECY.WA.GOV>

>>Sent: Sep 17, 2008 2:58 PM

>>To: Allen Campbell <agc1kcc@earthlink.net>
>>Subject: RE: Lead Chemical Action Plan
>>
>>Thank you for sending in your comments on the Draft Lead CAP. There is no proposed ban on lead ammunition in the Draft Lead CAP. We would like to work with hunters and shooters to promote non-toxic alternatives to lead without negatively affecting hunting or shooting areas.
>>
>>Please take a look at the fact sheet we prepared about lead ammunition and the Draft Lead CAP. I've attached the fact sheet to this email or you can access it at:
>>
>><http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/>
>>
>>Sincerely,
>>
>>
>>Holly Davies, PhD
>>Chemical Action Plan Developer
>>SWFAP/ Industrial
>>WA Department of Ecology
>>PO Box 47600
>>Olympia, WA 98504-7600
>>Phone: 360.407.7398
>>Fax: 360.407.6102
>>
>>-----Original Message-----
>>From: Allen Campbell [mailto:agc1kcc@earthlink.net]
>>Sent: Wednesday, September 17, 2008 2:23 PM
>>To: Davies, Holly (ECY)
>>Cc: Benton.Don@leg.wa.gov; Orcutt.Ed@leg.wa.gov; Zarelli.Joseph@leg.wa.gov
>>Subject: Lead Chemical Action Plan
>>
>>The plan is directly addressing shooting sports and hunting. There is no adequate substitute for lead ammunition. Balanced research would have explored the effect, documented the recommendations, availability / cost of alternatives, and effects to ownership and operation. Any effects on humans and wildlife do not justify a ban as recommended by Department of Ecology. This is a political ploy against firearms ownership and their use. The "yellow Journalism" in the document is unbecoming a professional paper, evenly balanced research, and a scientific document from a government organization.
>>
>>Allen Campbell
>>Vancouver, WA 98682
>>
>>360 608 4642

September 26, 2008

Response to "Public Draft Lead CAP"
2008
Department of Ecology Publication No. 08-07-009

This is a follow-up to my comments e-mailed 9-17-2008 (see following quotation).

"The plan is directly addressing shooting sports and hunting. There is no adequate substitute for lead ammunition. Balanced research would have explored the effect, documented the recommendation's, availability / cost of alternatives, and effects to ownership and operation. Any affects on humans and wildlife do not justify a ban as recommended by Department of Ecology. This is a political ploy against firearms ownership and their use. The "yellow Journalism" in the document is unbecoming a professional paper, evenly balanced research, and a scientific document from a government organization."

The draft is instigating a ban on lead ammunition for all firearms. Hunting, shooting, and shooting sports organization would have been included in the CAP committee if there was interest in working together. The following illustrates some areas where the draft is clearly flawed and the base for the recommendation is fabricated. An Honest report will follow the "Actions" noted at the end of this document.

The swan deaths have been and will continue and are due to ingestion of old shot in the refuge(s) before the Federal ban on lead shot and the century old mining waste in Idaho. The "Degernes et al. 2006" reports the cause for lead deaths due to ingestion, not shooting. The cause is due to old lead in the ground, not current hunting. Banning lead shot will have no effect on the swans mortality. Hunters are using non-toxic shot as required by Federal regulation for all waterfowl hunting. Canada banned lead for waterfowl in 1990. No lead shot is being added to the environment. The State of Washington has banned lead shot at upland release sites that have waterfowl. This was done several years ago. Also, all of the swans examined for were found to have the lead in their digestive system. They were not shot. A clean-up is needed to remove the pre-ban lead and the mine wastes (in Idaho) to prevent any further deaths due to lead ingestion poisoning. The report is written omitting this information and not clarifying specifics. This is unacceptable sloppy work or a political back door stunt. The report appears either, to be incomplete research or, the recommendations are by political direction.

The discussion of the California Condor and relation to eagles is a far reach. Yes, both are scavengers, but ingestion of lead gasses from a shooting range? Obviously there is no practical experience or understanding of shooting ranges to make this comment. Unless there is a presumption that PB (lead gas) is a lighter than air gas and it hangs in the air for eagles to soar through when picking updrafts.... Another pull at the feel good heart strings to save animals. Possible ingestion from waterfowl shot by lead shot but, there is that Federal law requiring all waterfowl hunting with non-toxic for over 15 years... There are no current studies showing eagle deaths due to lead shot, just the unsupported political supposition. The report appears either, to be incomplete research or, the recommendations are by political direction.

The use of lead shot in harvesting upland game birds is, again, based on old data “assumes an average of 6 shots per animal (U.S. Fish and Wildlife Service 1986; Washington Department of Fish and Wildlife 2001)”. Shots per bird does not take into account the hunters already using non-toxic shot for upland game and waterfowl as required in hunting regulations for several years. On the same page (126) shooting range and hunting shot are combined into a grand total. The totals should be segregated into separate categories for hunting and shooting sports (for a start). This tactic inflates faulty data and ignores the accurate numbers. Ignoring actual range operations or lack of interest in actual range operations, contribute to the incorrect perception of lead totals effecting wildlife through hunting and shooting sports. Again, the fabrication of a relation is due to incomplete research or, at political direction.

The Executive Summary, heading “Health Effects for People and Wildlife” starts with “1. Risk to birds from lead shot” and “2. Predator species that eat game wounded by hunters”. The only bird category tracked in the report is waterfowl for the State of Washington. The report poorly, if at all, does not define the current uses of non-toxic shot by waterfowl hunters today or for many years since, non-toxic shot is and has been a federal and state requirement for waterfowl for over 10 years. The report does not explain the deaths that have been dramatically and improperly illustrated, in the report are due to ingestion and not shooting. There is no data supporting eagles in the State of Washington are dying from lead shot from hunting. Also, the lead shot ingested by the swans is from before the federal ban on the use of lead shot for waterfowl hunting. The report appears, to be incomplete research or, at political direction, and does not explain this critical information.

The lack of a balanced committee and researchers and writers with no professional experience in the areas of shooting sports and hunting condemns this report. This may be why the report lumps all shooting into the use and effect of shot used for waterfowl hunting. Clearly the researchers and writers have no experience or

understanding of hunting and shooting sports. Or, the report is the fabrication of a non-existing problem due to incomplete research or, it is at political direction.

Actions:

- Remove all references and recommendations about lead shot and lead ammunitions for all hunting and shooting sports from the CAP draft and report.
- The real data and accurate use of the references do not support the fabricated relationship and error riddled calculated totals and the uses of ammunition.
- Have representatives from shooting, shooting sports, and hunting on the committee and the report preparation staff.
- Include this document in the comments / feed back about the draft and report.

Allen Campbell

Vancouver, WA
Agc1kcc@earthlink.net
360 608 4642

From: Rebecca Em Campbell
Sent: Thursday, October 02, 2008 9:18:13 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Rebecca Em Campbell
107 Pine St., No. 332
Seattle, WA 98101

From: Frank Campion
Sent: Thursday, October 02, 2008 6:03:23 AM
To: Davies, Holly (ECY)
Subject: Draft Lead Chemical Action Plan

Subject: Draft Lead Chemical Action Plan (CAP).

```
.ExternalClass .EC_hmessage P
{padding:0px;}
.ExternalClass body.EC_hmessage
{font-size:10pt;font-family:Tahoma;}
```

Ms Davis,

I oppose any proposed, lead bullet or lead pellet restrictions. I am a plinker and a competitive shooter and do not see the need to restrict lead bullets at this time.

Frank Campion

Sequim, WA

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From: Laura Campos
Sent: Thursday, October 02, 2008 9:10:36 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxin, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and especially, cosmetics and lotions.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Laura Campos
1023 Arleo Lane
Suite 540
Fircrest, WA 98466

253 2293581

From: Dan Cantrell
Sent: Thursday, September 18, 2008 4:33:57 AM
To: Davies, Holly (ECY)
Subject:

You are not elected to your position and cannot impose laws on us regarding a ammunition ban. You are messing with the second amendment. Do you think that with all the various military bases in Washington State that you can ban lead bullets, you pompous ass! Dan Cantrell

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From: Zack Carmichael
Sent: Thursday, September 18, 2008 11:40:38 AM
To: Davies, Holly (ECY)
Subject: Lead Comment

I strongly oppose Ecology regulating lead bullets. There is no adequate substitute for lead ammunition and that any affects on humans and wildlife do not justify a ban.

From: Dave Carpenter
Sent: Saturday, September 20, 2008 10:39:47 PM
To: Davies, Holly (ECY)
Subject: Draft Lead Chemical Action Plan (CAP)

Sir Which is demonstrably more dangerous to humans - lead from fired ammunition or cigarette smoke - how many billions a year in health costs has smoking added - Why isn't that banned first
There is no adequate substitute for lead ammunition and that any effects on humans and wildlife do not justify a ban.

Regards

Dave Carpenter

Trustee, Falls Township Rifle & Pistol Association.
Falls Township Rifle & Pistol Assn. Silhouette Team are proud to support the America Heart Walk.
dave.carpenter@FTRPA.com
[HTTP://www.ftrpa.com](http://www.ftrpa.com)

Club Location:
354 Newbold Road, Fairless Hills, PA 19030.
Postal Address:
P.O. Box 11, Fairless Hills, PA 19030
215.295.6365

Hm:
121 Independence Drive, Morrisville, PA 19067
Cell 267.981.6087. Home 215.736.9992

Government is always more interested in taking away liberties than restoring liberties.

From: JCarpen410@aol.com
Sent: Thursday, September 25, 2008 8:11:47 AM
To: Davies, Holly (ECY)
Subject: LEAD CHEMICAL ACTION PLAN

I am an avid hunter, target shooter, and keep a pistol for home defense. I would estimate in all honesty that 99% of all ammunition contains lead. I don't know of viable alternatives for hunting and self defense, there are no substitutes. Big game hunting really requires some stout bullets that will expand and deliver a humane kill. self defense also requires a bullet that will expand and quickly neutralize an attacker. Hunters made the switch to non-lead shot for waterfowl hunting as studies demonstrated that ducks and geese were suffering from lead poisoning. Conversely, I don't know of any reports of lead bullets causing any real environmental harm in hunting areas. Indoor ranges have exhaust systems to control lead exposure to humans.

This proposal to ban lead bullets equates to an anti-hunting, anti self defense measure.

Thank You
James Carpenter
21123 30th Place West
Lynnwood, WA. 98036

Copy to: Govenor Gregoire

Looking for simple solutions to your real-life financial challenges? [Check out WalletPop for the latest news and information, tips and calculators.](#)

From: Scott Carpenter
Sent: Thursday, September 18, 2008 1:42:18 PM
To: Davies, Holly (ECY); Kyler S Davenport
Subject: Lead Shot

To whom it may concern:

I am a biology student at Washington State University, as well as an avid hunter and outdoorsman. How many hunters have you heard of who have had any problems with lead from the ingestion of shot or bullet particles in meat? I know hunters who have been found to have lead shot in their stomachs during X-rays, and the doctors said it was of no concern. You should use factual information when proposing new legislation. There is very little if any threat to human life from the consumption of lead shot. This lead is in a solid metallic piece when ingested, and typically passes rapidly through the system. Birds of prey are the true reason for this ban, and how many raptors have been affected by the ingestion of lead-which may occur occasionally from eating lead-shot wounded game. Before I see legislative action I want to see numbers. Statistics. Reason.

Increasing the lead shot bans will result in more wounded game animals getting away because there is no adequate and cheap substitute. This further ban is a direct attack on anyone who enjoys the sport of shooting. It will create a European lack of opportunity for the underprivileged to enjoy their favorite sport. The elite will be the only people with the ability to afford regular shooting practices.

This proposed ban on lead shot is an attack on our second amendment, not because it removes our right to bear arms but limits our access to such endeavors based on economic status.

Thank You

Scott Carpenter

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From: Aaron Carr
Sent: Thursday, September 18, 2008 5:48:51 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

I would like to express concern regarding the Lead Chemical Action Plan.

There currently is no adequate/affordable substitute for lead ammunition and that any affects on humans and wildlife do not justify a ban as recommended by the WA Department of Ecology.

I do support certain aspects of lead banning, such as in the case of water fowl, however, scientific evidence says that "Lead is not very mobile. It does not wash away in surface or ground water". I would consider that to mean that it is a minimal threat to humans or animal populations local to range/hunting areas.

Thank you.

Aaron Carr

From: George Carr
Sent: Saturday, September 27, 2008 11:28:09 AM
To: Davies, Holly (ECY)
Subject: Phasing out Lead in Ammunition

Hi Holly,

My understanding of the lead in our environmnet is that we should indeed take steps to minimize and in some instances totally remove its use.

I am a sportsman and my colleagues and me have converted to steel shot over the years. This is a good thing and we are happy to make this effort and change.

The term "phasing" out of lead in components like ammunition sounds to most of us like and eventual total ban. This is unacceptable.

I am willing to support any effort that is reasonable.

Thank you for your time.

George

From: mlcarson1
Sent: Friday, September 19, 2008 11:52:08 PM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan Opposition

Dear Ms. Davies,

I am writing to you to express my opposition to the banning of lead from ammunition in the Washington State Lead Chemical Action Plan Document number 08-07-009. There is no substitute which maintains the same level of performance at a reasonable cost. I will be writing to the governor and my state legislators in opposition to this proposal.

Since 99% of my shooting is confined to a gun range, I should not have to bear an increased cost for ammunition I use for target shooting. This site is contained, and the land will never be developed, so the majority of people are never exposed.

I also do not believe the assertion that lead from bullets gets into our food. Any competent hunter or butcher removes the meat around the wound area. We banned the lead shot from waterfowl hunting years ago, and there is no need to go further. We are probably more in danger from farm raised fish and heavy metal contamination than from lead hunting bullets.

And with regard to the argument that it will cost millions to clean up gravel pits used for shooting. Perhaps the state should help create more shooting ranges within easy commuting distance of the outlying communities. Then we could contain the lead for easy cleanup and recycling.

Sincerely,

Michael W. Carson
9619 S. 205th Place
Kent, WA 98031

From: Amy Carter
Sent: Thursday, October 02, 2008 10:51:08 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Amy Carter
17009 NE 112th Way
Redmond, WA 98052

From: Gabriela Carvalho
Sent: Thursday, October 02, 2008 9:34:48 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Gabriela Carvalho
PO Box 23297
Seattle, WA 98102

(206) 325-0520

From: Norris Carver [ncarver1@rainierconnect.com]
Sent: Thursday, September 18, 2008 10:30 AM
To: Davies, Holly (ECY)
Subject: "Lead Chemical Action Plan"

The amount of lead from hunting, whether it is from shot shells in upland hunting or big game hunting is so small and widely dispersed it poses little danger to the ecology. In the case of practice shooting at the range or skeet range the lead is contained, and in most cases reclaimed. The range I shoot at has wildlife on-site, meaning sometimes you have to wait for the deer to leave the range before continuing to shoot. The lead does not seem to effect this wildlife.

I suspect a major component of the argument is anti shooting. We have already banned lead in waterfowl hunting. Enough is enough.

Norris Carver
2110 383rd Street East
Roy, WA 98580

From: John Casapiedra
Sent: Thursday, September 18, 2008 3:54:46 AM
To: Davies, Holly (ECY)
Subject: Ban on lead ammunition

To whom it may concern,

I oppose a ban on lead ammunition use by hunters here in Washington state.

Sincerely,

John Casapiedra Shoreline, WA

From: Ron & Sandy Casscles

Sent: Thursday, September 18, 2008 8:16:28 AM

To: Davies, Holly (ECY)

Subject: Ban on Lead shot

My name is Ron Casscles and I am a past president of the Port Angeles Trap Shooting Gun Club which has been in existence since 1927. We are a club of about 175 members who shoot clay targets on a regular basis twice a week. There are many trap shooting clubs like ours in the state of Washington and to pass a law banning the use of lead shot for target shooting would mean the closing of all these clubs and take away a lot of enjoyment for many state residents as well as out of state shooters who come to our state to shoot in national competition. At this time there is no alternative shot that compares in price to lead, (which is very high even now) If another form of shot was found, example steel, it is VERY expensive and most of the shot guns in use today cannot stand the continued use of steel shot on a full time basis. Banning lead shot for hunting is not a good thing for the many sportsmen in the state for the same reasons as mentioned. I agree that no lead for water fowl is worth the effort, but most trap shooting is done on private land and it can be reclaimed from time to time, which would help stop the fears of those who feel that lead in or on the ground is a problem. I am just an average person who feels that everything that we have in our country is slowly being taken away from us by a few people who seem to want to control what most of us have worked so hard all our lives to preserve. Please pass this along to those who are at the heart of this discussion. I have also sent a similar note to the Governor Gregoire. Respectfully, Ronald J Casscles, Sequim Washington

In God We Trust,

Ron and Sandy Casscles

From: Deborah Casso
Sent: Friday, October 03, 2008 12:14:29 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Deborah Casso
6832 20th Ave NE
Suite 540
Seattle, WA 98115

From: Goldie Caughlan
Sent: Friday, October 03, 2008 3:51:41 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Goldie Caughlan
1508 McGilvra Blvd. E.
Suite 540
Seattle, WA 98112-3818

From: Sharon Chen
Sent: Thursday, October 02, 2008 3:17:51 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Sharon H Chen
1526 17th Ave E
Seattle, WA 98112

(206) 322-6935

From: Chris Cherry

Sent: Wednesday, October 01, 2008 10:58:03 AM

To: Davies, Holly (ECY)

Subject: Lead Chemical Action Plan

To whom it may concern,

I am contacting you as a result of the Department of Ecology's proposed Lead Chemical Action Plan. I do not support any legislation that inhibits the second amendment rights of legal citizens. Though I am equally concerned about our environment's welfare, I see this as a back door ammunition ban (therefore limiting the 2nd amendment). I urge you to see this for what it is and vote down accordingly.

Sincerely,
Chris Cherry

From: Jennifer Chiafalo
Sent: Saturday, October 04, 2008 1:40:51 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Jennifer Chiafalo
10066 8th Ave NW
Suite 540
Seattle, WA 98177

From: Sue Chickman
Sent: Friday, October 03, 2008 3:59:24 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Sue Chickman
220 Strawberry Field Dr
Sequim, WA 98382

From: Allen J. Chinn
Sent: Thursday, September 18, 2008 6:52:28 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Hello,

My belief is that reducing lead contact with banning lead ammunition is not fair, and almost impossible without undue hardship on target shooters, hunters and hobbyists. This would also put citizens and retailers throughout the state, with ammunition that would be worthless.

Lead ammunition is the only ammunition permitted by this state's muzzleloader regulations? Will the Department of Fish and Wildlife change their regulations? Lead is the least expensive material shot through firearms of any type.

What would the citizens and businesses do with their supplies of lead ammunition? Would the state compensate them with money, or replacement "authorized" ammunition?

If lead is banned from permitted ammunition, what will the State permit, or substitute lead with? Does the State have a solution? How will the State conduct safe disposal of lead ammunition? How will the State remove the lead bullets from the loaded cartridges? Or is this ban, done without suitable solutions for the citizens of this state?

Lead is also used universally in fishing. Will lead weights of all kinds be banned from our lakes, rivers and salt water bodies?

*Thank you.
Allen J. Chinn
Seattle, WA*

From: Jodialanc@aol.com
Sent: Friday, September 19, 2008 12:08:01 PM
To: Davies, Holly (ECY)
Subject: Banning Lead ammunition

I would like to express my opinion about the proposed banning of lead ammunition. I feel this would create an undue hardship for many hunters and gun enthusiasts as there is no adequate substitute for lead. Further the amount of lead being introduced into the environment is very minuscule. I would really like to see proof of how harmful this is in respect to other contaminants we are introducing into the environment through manufacturing etc. I also feel this is an attempt to do an end run around the issue of recreational shooting on public lands. I know in the past there have been attempts to ban or severely limit recreational shooting and this is a way to get that desired result without having to go through politically fair process such as a measure on a ballot. Please consider the impact this will have state wide. If there is real and legitimate danger to the environment from lead show us a study with these facts. I would be interested to know how much of an impact this will have in the larger environment.

Respectfully, Alan Christensen

Nine Mile Falls, WA

Looking for simple solutions to your real-life financial challenges? [Check out WalletPop for the latest news and information, tips and calculators.](#)

From: Kimberly Christensen
Sent: Friday, October 03, 2008 3:46:14 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Kimberly Christensen
3827 Bagley Ave. N.
Seattle, WA 98103

206.675.8090

From: WALTER D CHRISTENSEN

Sent: Friday, September 19, 2008 1:17:55 PM

To: Vermillion, Kathy (ECY); DJ Frank

CC: info@beegc.org; info@tacomasssportsmensclub.com; inwc@wildlifecouncil.org; admin@kittitasfieldandstream.org; richreathafor@attbi.com; mr_walter2@yahoo.com; kcarpenter@bcmlaw.com; tom.quailcreek@gmail.com; mattm@redhawkusa.com; information@skagitssta.com; office@washingtonarmscollectors.org; Ujhammer@aol.com; leeguns@hotmail.com; woodymathews@hotmail.com; rgrwjb@hotmail.com; jim@universalcorporate.com; spindleblaster@msn.com; boyd@seanet.com; protect2ndamd@comcast.net; rickbrooker@msn.com; handgnr@centurytel.net; parabellum9@aol.com; rje@wildblue.net; ron@uplandbirdbranch.com; staff@dryhollow.com; info@gryphonranch.com; glsheets@gmail.com; ron.bruno@verizon.net; bob@boldman.com; quack1407@msn.com; guitars@tgi.net; dlhargin@msn.com; RanJenJohnson@aol.com; carl@wcwinc.org; r.ripley@wcwinc.org; BSEditor@aol.com; info@vashonsportsmensclub.com; president@wsrpa.org; 44spl@charter.net; membership@rfgc.org; Davies, Holly (ECY)

Subject: Re: draft Lead Chemical Action Plan

tis true

at the meeting I attended there was only one person whom represented the fishing community, but no one who represented the hunting/shooting community per se. a person from wdfw was listed as representing the fishing section of that dept, but no one from the wildlife/shooting division, and no one at all from wdfw was present at the meeting I attended. nada.----- Original Message -----
walt

From: DJ Frank

To: Vermillion, Kathy (ECY)

Cc: info@beegc.org ; info@tacomasssportsmensclubcom ; inwc@wildlifecouncil.org ; admin@kittitasfieldandstream.org ; richreathafor@attbi.com ; mr_walter2@yahoo.com ; kcarpenter@bcmlaw.com ; tom.quailcreek@gmail.com ; mattm@redhawkusa.com ; information@skagitssta.com ; office@washingtonarmscollectors.org ; Ujhammer@aol.com ; leeguns@hotmail.com ; woodymathews@hotmail.com ; rgrwjb@hotmail.com ; jim@universalcorporate.com ; spindleblaster@msn.com ; boyd@seanet.com ; protect2ndamd@comcast.net ; rickbrooker@msn.com ; handgnr@centurytel.net ; parabellum9@aol.com ; rje@wildblue.net ; ron@uplandbirdbranch.com ; staff@dryhollow.com ; info@gryphonranch.com ; chris_wd@msn.com ; glsheets@gmail.com ; ron.bruno@verizon.net ; bob@boldman.com ; quack1407@msn.com ; guitars@tgi.net ; dlhargin@msn.com ; RanJenJohnson@aol.com ; carl@wcwinc.org ; r.ripley@wcwinc.org ; BSEditor@aol.com ; info@vashonsportsmensclub.com ; president@wsrpa.org ; 44spl@charter.net ; membership@rfgc.org ; Davies, Holly (ECY)

Sent: Thursday, September 18, 2008 1:31 PM

Subject: Re: draft Lead Chemical Action Plan

I am very disappointed with this Holly. The only attachment you included here is NOT the CAP but rather only a "soothing" cover letter for an roughly 300 page document. You should have included a link to the complete document at the very least, rather than the general overview on the DoE's website. (Included here for those on this distribution list who haven't found it or had the time to look yet.)

<http://www.ecy.wa.gov/pubs/0807009.pdf>

We will review the entire document asap and comment.

I also note that there is no representation from the shooting and hunting community on the

advisory panel. Be advised that this can--and no doubt will--raise some red flags with those of us who enjoy these pastimes.

Regards,
Dan Frank
Director
Washington Arms Collectors
Editor
GunNews Magazine

Vermillion, Kathy (ECY) wrote:

Attached is a copy of the draft Chemical Action Plan (CAP). Please send any comments to Holly Davies at hdav461@ecy.wa.gov , or call Holly at 360 407-7398.

SEP 29 2008

Thursday, September 25, 2008

Ecology - SWFA - Ind

Holly Davies
Dept of Ecology
P.O. Box 47600
Olympia, WA 98504-7600
Fax: (360) 407-6102

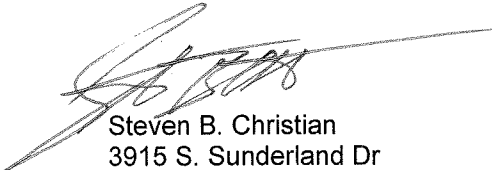
RE: Washington State Lead Chemical Action Plan (Public Review DRAFT)
Department of Ecology Publication No. 08-07-009

Dear Ms. Davies,

After hearing about the Washington State Lead Chemical Action Plan (Public Review DRAFT) and being an avid sportsman strongly participating in Target shooting sports, I decided to take a look and read the document. The tone and some conclusions, I find to be needlessly alarmist. Something I find disappointing from a document I would expect to be more precise, especially coming from a supposed knowledgeable source. Several times in the document I find terms such as "Hundreds of", "a lot of", "numerous" and "Most of" terms the media uses to over embellish the facts and verbiage I would expect to find in a fiction novel, not in a document that is supposed to be factual.

I specifically have issue with the section on firearm ammunition, where the statement is made "Most ammunition now comes in non-lead versions" A quick search of the top 3 US bullet manufactures (Sierra, Hornady, Nosler) comes up with 5 lead free bullets in 3 select calibers. I think that's sort of a stretch for the definition of "most". Select Specialty manufactures such as Barnes; do make a larger selection of lead free bullets, but at a substantially higher cost, a cost that most sportsmen would find economically challenging and not practical. Even the notation about the US Army's lead free ammunition "The U.S. Army has developed a new M-16 5.56mm lead free bullet that they are phasing into use. It is a copper jacketed tungsten-tin composite with comparable ballistics, weight and extremely low mammalian toxicity" fails to note that the cost is 8 times higher than the currently available ammunition by the US Army's own analysis and their buy quantities (200 Million rounds/ yr). That's 8 times more of your and my tax dollars. I strongly feel that this entire document is written with the sole intention of getting a desired emotional political action, regardless of the plan impact. In reference to the recent Publication Number: 08-07-025 where it is stated "Lead from ammunition is one of the many sources of this metal covered in the draft Lead Chemical Action Plan (CAP). The CAP is a planning tool to guide statewide efforts to reduce lead exposures in the environment. The goal is to lower the amount of lead people and wildlife are exposed to. The CAP does not include any recommendations to ban or regulate lead in any type of ammunition beyond current law. This includes all shotgun, rifle and handgun loads." The mere publication of this document tells me that there has been substantial public comment not supporting the recommendation(s). Even though it is stated that the DOE does not make any recommendations in the CAP on the banning of lead ammunition, Politicians, who may not be familiar with the shooting sports will use it as a tool to potentially introduce legislation to do so. I could continue, however my tax dollars are paying your salary and I am sure you have more letters to read regarding this issue.

Respectfully,



Steven B. Christian
3915 S. Sunderland Dr
Spokane Valley, WA 99206

From: thomas christian

Sent: Friday, September 19, 2008 12:16:41 AM

To: Davies, Holly (ECY)

Subject: lead ban

I am a hunter and sport shooter and I am Against any ban on lead ammunition. As you no there is no adequate or affordable substitute for lead in rifle or hand gun ammunition. Banning lead would put an undo hardship on the shooting public.

Thank you

Thomas E Christian 2156 W HWY 101 Port Angeles WA.
98363

See how Windows Mobile brings your life together—at home, work, or on the go. [See Now](#)

From: Dave & Carolyn Christie
Sent: Thursday, September 18, 2008 12:08:02 PM
To: Davies, Holly (ECY)
Subject: Ban on lead for hunting and target practice

Dear Ms. Davies,

It has come to my attention that there is a proposal to ban the use of lead in all ammunition used in the state of Washington. I would like to register my opposition to this proposal. I do not believe that it has been shown that this drastic action is either warranted or necessary. There is no adequate substitute for lead ammunition and the effects of the use of such ammunition on humans and wildlife has not been shown to justify a ban as recommended by the Department of Ecology.

Please register my opposition to any such ban.

Sincerely,
David C. Christie
12109 SE Riveridge Dr
Vancouver, WA 98683
(360) 254-9029

From: J E CIESIELSKI

Sent: Tuesday, September 30, 2008 4:18:01 AM

To: Davies, Holly (ECY)

Subject: CAP Lead Ammunition

I have been involved in the shooting sports for over 15 years of which most of it has been at indoor ranges. We sportsman and citizens have been concerned over our health long before it became a political and environmental issue. I have lived here in the city of Spokane and have taught school in Kellogg, Idaho. I have spent my life time under the cloud of lead poisoning from Northwest mining.

Reloading ammunition has always had its risk for us. The industry has created lead free primers and encapsulated bullets, safe handling of material removed from the backstops of ranges, and good ventilation fans and filters for our and the public's health.

I urge the Dept. of Ecology to continue to research the issue. There are environmentalist and antigun groups who are so despicable as to use the lead health issue to violate our Second Amendment rights by banning the use of lead in ammunition. Yes do the research but don't ban lead in ammunition until science and technology finds an alternative, viable, and cost effective replacement for lead. Don't be an unwilling/willing participant in a despicable effort to change our Civil Bible (The U.S. Constitution) and take away our rights. Yes, I too want a healthy environment for us and my children but not at the cost of our liberty and freedom. Thank you.

Sincerely,

Joseph Ciesielski

From: Brian Cieslar

Sent: Wednesday, September 24, 2008 2:02:38 AM

To: Davies, Holly (ECY)

Subject: Lead CAP

I'm concerned about your plan affecting the price of ammunition. I don't believe there is a suitably priced alternative. Just wondering if your panel is stacked with anti-lead people or is there any room for discussion? Usually I don't respond to these public comment opportunities because my experience has shown little or no change in your drafts once released to the public. Washington DOE seems dedicated to protecting us from things we don't need protection from.

Brian Cieslar
Lynden, WA
bcieslar@enfieldfarms.com

From: Dick Cinkovich
Sent: Sunday, September 28, 2008 1:39:13 AM
To: Davies, Holly (ECY)
Subject: Lead Ammunition Ban

Dear Holly Davies,

I'm writing to weigh in on the lead ammunition ban in the proposed CAP.

Many times in an effort to help protect people, wildlife and the environment we strain to apply uniform standards that simply don't fit every situation.

Hunters have, and will continue to, be the greatest and best advocates for conserving wildlife now and for our future generations. Hunters have proven to be self-regulating and generate funding for WDFW without aid from the general budget.

I use public lands for hunting, shooting, hiking, photography and more.

I find it hard to believe that lead bullets used while hunting any species is really a problem for humans and wildlife. I do understand the concern over the buildup of lead in areas used as shooting ranges. In my opinion, the use of public lands as shooting ranges and the use of lead bullets for hunting are two separate issues. I am a member of a local gun range and practice most of my shooting at the range where lead is contained. I have used public lands as shooting ranges before and support regulation of shooting ranges on public land for a number of reasons, lead concentrations among them. Washington citizens recently voted to better control the use of public lands for shooting ranges further reducing the need for new regulations from Ecology.

In one week I will be hunting elk during muzzle loader only season when any projectile made of a substance other than lead is illegal. No substitute is currently available.

My concern for our state is that we will follow the example of California and Arizona where the voluntary ban became a legal ban in just two years by legislation or regulation. The nature of government and regulatory authority throughout history leads me to conclude that we would simply follow in the steps of California and Arizona where a ban followed the original "voluntary" suggestions.

I have a good friend living in California who loads custom ammunition. Non-shooters and hunters assume that suitable substitutes for lead based ammunition already exist and are cost effective. Not always true. His experience is that the ban in California, while well intentioned, misses the mark and is causing an unneeded legal and financial burden on California

shooters and hunters.

We already have bans on toxic shot in waterfowl areas and I agree with that application of science and government oversight. I see no need to place a CAP policy in place that historically leads to a legal ban when hunters, shooting ranges and government have already addressed the problem.

Washington State citizens, and our state government in particular, pride themselves in exercising tolerance and in our ability to live with our diversities. I highly recommend that Ecology refrain from imposing bans on lead based ammunition regardless of cost, performance or availability of substitutes.

Sincerely,

Dick Cinkovich
22925 19th Dr SE
Bothell, WA 98021

From: Dorthy Shaw

Sent: Saturday, October 04, 2008 10:52:46 AM

To: Davies, Holly (ECY)

Subject: Lead Ban

I find the DOE background report on lead contamination of WA's environment to contain poor science at best and totally faulty conclusions pertaining to lead fishing weights, lead shot, and lead bullets. The proposal to ban these sources of lead is without merit. Additionally, the major culprits are atmospheric drift from the Asian continent, and vehicular and industrial operations. Please put your attention where it truly belongs. This is an unacceptable way to discourage use of firearms.

C. Clare Cranston
907 W Nixon Street
Pasco, Wa 99301

From: Bruce Clapp
Sent: Sunday, September 21, 2008 4:40:19 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Good Morning.

I want to let you know that I am very concerned about this plan, and consider it to be a very bad idea. There are no viable substitutes and this will only create more problems. I would like to strongly urge you to stop this plan. I will follow up my concerns with the Governor's Office.

Best Regards,

Bruce Clapp
Elma, WA

From: Todd Clark
Sent: Thursday, September 18, 2008 3:50:12 AM
To: Davies, Holly (ECY)
Subject: Lead ammunition

Hello,

As a sport shooter and firearms enthusiast, I'm writing to protest the proposal to ban lead ammunition in the state of Washington. There is no adequate substitute for lead ammunition and no studies have been done that I know of that support these alleged affects on humans and wildlife. In other words, there is no justification for a ban and it's nothing more than a backdoor attempt at gun-control, IMO.

Thanks,
Todd Clark
Brinnon

From: Nancy Cleminshaw
Sent: Thursday, October 02, 2008 7:14:33 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies
I support a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Nancy Cleminshaw
2101 Montvale Ct W
Seattle , WA 98199-3925

(206) 281-8487

From: William Clifford
Sent: Sunday, October 05, 2008 12:28:28 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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Sincerely,

William Clifford
161 22nd Av
Seattle, WA 98122

From: Kristen Clifton
Sent: Friday, October 03, 2008 2:23:40 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Kristen Clifton
4101 SW Portland St.
Suite 540
Seattle, WA 98136

206-427-5064

From: Rex A Clinton
Sent: Friday, September 19, 2008 5:53:44 AM
To: Davies, Holly (ECY)
Subject: Lead

The ban on lead shot for waterfowl hunting was understandable as there was shown an effect on waterfowl. The proposed ban on lead ammunition for hunting and target shooting is not an environmental concern rather a further attempt to restrict the 2nd amendment. It is a stupid idea.
Rex Clinton

The liberty we prize is not American's gift to the world, it is God's gift to humanity."

From: Michelle Clinton
Sent: Friday, October 03, 2008 2:48:12 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Michelle Clinton
18531 134th PL NE
Woodinville, WA 98072

From: HARLEY COATES

Sent: Tuesday, September 23, 2008 4:25:44 AM

To: Davies, Holly (ECY)

Subject: CAP

It is easy to understand the lead ruling for water fowl do to the fact they do forage in the area were the shot is bound to land, but to do away with rifle and hand gun bullets that contain lead is getting way out there. I have never herd of anyone getting lead poisoning from a deer or elk that they have shot meat. Please give this a lot more thought, if they do away with lead all you will have is a lot of wounded game dying in the woods because it will be impossible to find after it runs for a mile or two, not counting the suffering do to a lack of bullet energy.

From: Jamie Coates-Robertson
Sent: Thursday, October 02, 2008 12:14:04 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Jamie Coates-Robertson
8321 172nd Ave NE
Redmond, WA 98052

(425) 861-4426

From: Ian Coen
Sent: Sunday, September 21, 2008 1:59:46 AM
To: Davies, Holly (ECY)
Subject: Lead Amunition

I am very concerned about the proposed ban on lead ammunition. I am an antique gun collector and the only ammunition I am able to procure is what I produce using lead. I cant purchase projectiles that are non-lead which would leave me with useless relics. I have hunted annually and taken game in several states including California prior to their ban. I have my lead leaves run annually and have a reading of ZERO!

As a former environmental consultant I know lead like asbestos is a natural occurring element. Here is an odd bit of trivia, did you know that the state capitol building has a rock containing asbestos in front of it. Lead also occurs in nature. So hunters shooting lead, people shooting millions of 22's have no choice but to use lead because the only commercial load is a lead alloy mix on about 75% lead.

I strongly urge the state not to make the same mistake as California an ban the use of lead ammunition. Their decision was based on flawed data.

From: Patricia Coffey
Sent: Friday, October 03, 2008 9:18:42 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Patricia Coffey
2253 Woodbine Road
Langley, WA 98260

360-321-5884

From: Tony C
Sent: Saturday, September 20, 2008 10:15:14 AM
To: Davies, Holly (ECY); Bob Boldt; bobsgonefishing@hei.net; tom sunick
Subject: Lead in ammunition

The ban of lead shot for waterfowl hunting probably has merit; as water birds do pick up shot and use it in their crops to process food.

The ban of lead in rifle and pistol bullets and the ban of lead shotshells for upland bird hunting **makes absolutely NO sense at all!** Land animals and inland flying creatures in Washington do not consume the lead in either copper jacketed bullets, solid lead bullets or even lead shot!

EXPANDING THE BAN ON LEAD TO ALL AMMUNITION WOULD RESULT IN UNWARRANTED INCREASES IN THE COST OF AMMUNITION AND, FURTHER, SERVES NO PURPOSE OTHER THAN TO PENALIZE HUNTERS, SHOOTERS AND SECOND AMENDMENT PROPONENTS!

NO MORE BANS ON LEAD IN AMMUNITION!

Tony Collette
A 'bitter gun owner' and VOTER

See how Windows Mobile brings your life together—at home, work, or on the go. [See Now](#)

From: Gretchen Colonius
Sent: Thursday, October 02, 2008 7:18:14 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Gretchen Colonius
12020 81st ave ne
Kirkland , WA 98034

From: [Greg Pickles](#)
To: [Davies, Holly \(ECY\):](#)
Subject: Comments on Lead Chemical Action Plan
Date: Monday, October 06, 2008 3:46:39 PM

Dear Ms. Davies,

Having read the Lead Chemical Action Plan with regard to the prohibition of lead in firearm ammunition and fishing equipment I feel that the ban (if not an outright ban, a de facto ban) it proposes on the use of lead in these areas does not adequately consider the consequences.

Banning the use of lead in ammunition or making it significantly more expensive through taxation will destroy the sport shooting industry in the State of Washington. This industry supports tens, if not hundreds, of millions of dollars in commerce and millions of dollars of tax and license revenue every year. Without the ability to use lead ammunition a huge portion of this commerce and revenue will disappear.

The report repeatedly mentions the availability of non-lead alternatives for ammunition but it never addresses the cost of using these alternatives. All of them are significantly more expensive than lead and forcing shooters to use them will put sport shooting out of the reach of many, many shooters, especially those who are retired and must live on a fixed income. It also will have a devastating effect on many families where a parent wants to pass on the shooting tradition to his or her children. Over the years, the State of Washington has had many highly ranked national and international competitive shooters but that will no longer be the case if it is economically unfeasible to introduce young shooters to the sport.

Furthermore there are many firearms currently owned by the citizens of Washington for which there is no alternative to lead ammunition. The report mentions "some shotguns" cannot use the alternatives to lead shot but it gives no estimate of the number of such arms. I suspect that the number is far greater than the report leads the reader to believe. For the owner of such a shotgun, a ban on lead shot will require him to put a potentially valuable firearm at risk by shooting other types of shot or abandon use of the gun altogether.

Aside from shotguns, the report make no mention of muzzle loading

rifles. As far as I know there are no alternatives to lead projectiles for these guns that are legal in the State of Washington. Hunting with muzzle loading rifles has become immensely popular in recent years resulting in many, many hunting licenses being sold. Without lead ammunition this entire activity will stop.

The report also mentions the use of lead in primers in centerfire ammunition and says that there are alternatives available. It goes on to mention, without identifying the alternatives, that they are less stable over time and require different loading techniques, again without identifying them. If the State of Washington outlaws the use of lead-based primers, it will severely reduce the availability of commercial ammunition because it is unlikely that most national manufacturers will produce special ammunition for Washington consumers and those that do will charge a hefty premium for it. The long-term stability of these primers is also of concern. The last thing anyone wants is ammunition floating around that becomes unstable in a comparatively short period of time.

In the area of fishing, the report indicates that banning of lead would have no impact on fly fishing. That is completely incorrect. The use of small lead split shot and lead weighted flies is essential in some forms of fly fishing. The shot is important in supplying weight attached to the leader where small size and a soft composition are essential to minimize effects to the presentation of the fly and protect the delicate leader. Flies must adequately mimic a natural creature to fool the fish. When weight is required in a fly, lead is the only substance with the density and malleability required to produce a properly proportioned fly. There are also fly lines that incorporate lead into their composition to cause the line, or a portion of it, to sink. There is really not adequate substitute for lead here.

Aside from fly fishing, there are many other fishing activities that require lead and for which there is no adequate substitute. Lead core line that is used for trolling comes immediately to mind. In all my years of fishing the vast majority of it has been done in waters too deep for lead to present a credible danger to waterfowl from lost sinkers. When a duck or a loon collects gravel does it do it in 25 feet of water (or even half that)? I suspect not.

My comment can be summed up by saying that there is relatively little to be gained by prohibiting the use of lead in ammunition and fishing gear and a tremendous amount of commerce and tax revenue to be

lost.

Sincerely,
Gregory M. Pickles

From: [Kert Peterson](#)
To: [Davies, Holly \(ECY\):](#)
Subject: Comments on the proposed Lead Chemical Action Plan
Date: Monday, October 06, 2008 3:32:07 PM

To Whom It May Concern:

I **do not support** your Chemical Action Plan for Lead on firing ranges or for hunting. While the chemical element Pb is indeed a heavy metal hazard if ingested by animals, several peer-reviewed studies, such as the one by the University of Iowa Hygienic Laboratory, or the one conducted by the Department of Geosciences at Virginia Tech have shown that lead on ranges or in forests is not a hazard to wildlife. We all know that lead pellets in the muck around lakes, ponds, and shorelines did contribute to lead poisoning in waterfowl. That is the reason why sportsmen supported the ban on lead shot and the move to non-lead shot for waterfowl hunting.

However, lead on firing ranges is not migratory in the ground water, and in fact, is easily stabilized. The implementation of Lead recovery/recycling plans by ranges helps to ensure recovery of reusable lead. This recovered lead is an inexpensive source of lead for bullets, and even fishing weights. And, as the Virginia Tech study showed, "...although the metal in lead bullets and shot corrodes rapidly in the natural environment, the lead becomes trapped in the corrosion products so it cannot easily migrate away...Lead is not very mobile. It does not wash away in the surface or ground water."

A supplemental study found "No evidence that birds were eating shot...it does not appear to be a problem on this range [in the National Forest near Blacksburg, VA, where the study was conducted]"

Please do not be fooled by junk science into taking an unnecessary action against hunters and sportsmen. What we

see on the horizon is just another 'end-around run' at trying ban hunting and sport shooting by those who hate guns, hunting, and sportsmen.

Thank you.

Sincerely,

Kertis D. Peterson, EE
1550 Weathervane Drive
Fircrest, WA 98466
(253) 460-7016

"Scientists dream about doing great things,
engineers do them."

James Michener

From: [Joyce Tattershall](#)
To: [Davies, Holly \(ECY\):](#)
Subject: Comments Regarding Lead Chemical Action Plan
Date: Monday, October 06, 2008 11:12:16 AM

Holly Davies
Dept of Ecology
P.O. Box 47600
Olympia, WA 98504-7600
Fax: (360) 407-6102
e-mail: hdav461@ecy.wa.gov

Dear Ms. Davies:

I am writing to express my disagreement with a policy of further controlling or banning lead in ammunition used for hunting and target shooting. Lead ammunition has long been banned for hunting waterfowl and other game birds with hunters switching to steel shot. This type of substitution does not work as well for other types of shooting sports such as rifle and pistol. Most big game hunting is done with jacketed bullets which only contain small amounts of lead. Most all-lead ammunition is used for target shooting on a range in a controlled situation. Much of the lead is recycled by the users themselves. Shotgun shot used in clay bird shooting on a range is reclaimed and recycled regularly - usually either on an annual or two-year basis. On these ranges, migration of lead into the water table is very minimal.

Another issue frequently brought up is that other animals suffer from eating animals shot with lead bullets. There is no evidence that animals eating the remains of animals shot with lead bullets experience elevated levels of lead in their system.

Despite no scientific evidence supporting the claim that lead ammunition is endangering the health of people or endangered species, anti-hunting groups use the fear of these things as they continue to pursue their goal to disarm law-abiding American citizens. I certainly hope that Washington state will not go the route of basing policy on fears rather than scientific evidence.

For further information, please check the National Shooting Sports Foundation website at www.nssf.org.

Thank you for your attention.

Del Tattershall

From: Mike Conlan
Sent: Friday, October 03, 2008 12:45:31 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Mike Conlan
6421 139th Place NE, #52
Redmond, WA 98052-4588

(425) 881-2593

From: Pat Conrad
Sent: Wednesday, September 24, 2008 9:43:00 AM
To: Davies, Holly (ECY)
Subject: Lead Bullets

There is no adequate substitute for lead ammunition and any affects on humans and wildlife do not justify a ban as recommended by the Department of Ecology.

Patricia Conrad
109 White Road
Chehalis, WA 98532
360-245-3377

From: Conrads, Thomas
Sent: Friday, September 19, 2008 6:46:41 AM
To: Davies, Holly (ECY)
CC: Conrads, Thomas
Subject: Comments on the Draft Lead CAP

To Whom It May Concern:

With all of the environmental issues we have, I do not believe the data supports banning the use of lead for fishing weights, shotgun shot, and like products that are used by a small segment of our society. For the most part these items are not deposited indefinitely in the environment. Seldom are the lead weights used by fishermen lost. Lead shot at the shotgun ranges is reclaimed. Wheel weights are recycled. Hunters that use shotguns are precluded from depositing this shot in small areas since lead shot is not allowed for waterfowl hunting. Other hunting where lead shot is allowed is over large expanses of land where shots are fired very seldom and at random for a small timeframe throughout the year.

I would suggest that the Department of Ecology's priorities be reviewed so the State of Washington can be better served by the Department's initiatives.

Tom Conrads

From: Mac Conserriere

Sent: Wednesday, October 01, 2008 6:02:13 AM

To: Davies, Holly (ECY)

Subject: Washington Department of Ecology Chemical Action Plan for Lead.

Subject: Washington Department of Ecology Chemical Action Plan for Lead.

Dear Sir or Madam:

Lead is a relatively common occurring element on planet earth. Man as utilized it for years because of its abundance, easy of formation and density.

Over the years scientific evidence has resulting in mankind's reduction in longtime products using lead. In these cases a viable alternative was developed first and then the lead containing product discontinued. Examples of this are use of lead as an anti-knock in gasoline and lead as a base for pigment in paints. These were both proven to be a hazard, not just hypothesized.

Lead in its current use in wheel weight, fishing weight and ammunition have not been proven to be a hazard. And at this time there does not appear to be a feasible and economically comparable product to replace it. Therefore I request and encourage you to ensure this CAP is not adapted.

In addition, I see this effort as an effort to restrict my Second Amendment Rights by the elimination of ammunition. Firearms are just as necessary today as they were in the time of the penning of the Bill of Rights. Firearms are safely used for hunting, sport shooting (organized and unorganized competition) as well as necessary for self defense. The Supreme Court has already recognized that the police of our great nation are not responsible for individual safety, but the common good, therefore individual safety falls upon each of us. There are already enough laws concerning firearms and crime – just enforce the existing ones!

Sincerely

Richard W. Conserriere
6602 West 16th Avenue
Kennewick, WA 99338

From: Ray Conwell
Sent: Friday, September 19, 2008 2:54:11 AM
To: Davies, Holly (ECY)
Subject: Attempted ban on lead ammunition

Gentlemen/ Ladies,

Surly there are more important issues you could waste tax payers money on. Why not take on the lead paint and other products containing lead being shipped in here from around the world. We in this state of liberal, tax and spend politicians have just about had enough of your wasteful spending and liberal legislation.

The only thing keeping you liberals in office is your corruption with the ballot boxes. " keep counting until you get the numbers you need to keep your offices". The government in this state is a national joke.

Reconsider this move before the entire country is laughing at us.

Ray Conwell
13709 SE 255th PL
Kent WA. 98042
253-638-6245
rcretired@msn.com

From: DavidCook@aol.com
Sent: Thursday, September 18, 2008 6:28:16 AM
To: Davies, Holly (ECY)
Subject: Lead

This is another stab in the backs of the gun owners in this state. I must say that Until there is a adequate substitute for the lead rounds this needs to be put on the back burner. I do not disagree that lead has an affect on wildlife, but banning it before there is a substitute is totally wrong, and unfair to the sportsmen who hunt, target shooting, etc. I would think people in your position would have a viable solution and substitute so there is a smooth transition from lead to a non-lead bullet that will not affect the environment or the wildlife. Sadly EGO'S cloud the thought process of those who are involved in these studies and the actions to be taken on their proposals.

I didn't serve in Vietnam and almost bled to death from wounds from a 75mm Recoilless Rifle round hitting 6 feet from me. I served to protect our freedoms, and the 2nd amendment of the Constitution. I did not serve to have people who are in the position of power to destroy the 2nd amendment in any way. Banning lead rounds without a adequate replacement is doing just that and it is totally wrong. So pull your heads out of the sand and find a submitted then take the action, not the action first. This is a no brainier but to some only see in tunnel vision and lack the respect to those who the action will affect the most. Dead heads have no place in being involved in making these type of decision or providing information that is completely bias. This is unreasonable to say the least.

Because of the continued attacks on the law-abiding gun owners I was forced to become a life member of the NRA and support them in every way I can.

I do not support the ban on the lead round until a substitute is available first.

Thanks, Dave Cook

Psssst...Have you heard the news? [There's a new fashion blog, plus the latest fall trends and hair styles at StyleList.com.](#)

From: Dale Coppess
Sent: Sunday, September 21, 2008 2:48:27 AM
To: Davies, Holly (ECY)
Subject: Lead ammunition

Dear Ms. Davies:

As a hunter and shooter I do not believe there is a danger from lead ammunition to our environment. Most shooting takes place at outdoor or indoor shooting ranges where any lead is confined. Big game hunting contributes a minuscule amount of bullets in the forested areas and water fowl hunting is done only with steel or other non lead shot. Requiring non lead bullets would only cause undue expense with no environmental impact.

Dale Coppess
19006 SE 266TH ST
Covington, Wa.98042

From: jim cornaggia
Sent: Saturday, September 20, 2008 1:36:11 AM
To: Davies, Holly (ECY)
Subject: Lead

I strongly object to any ban on lead used in the shooting sports beyond current guide lines for lead shot in wetlands where ducks and other waterfowl are affected.

My business is directly related to bullet casting for target shooters. A ban on lead bullets will close my business and put employees out of work. This is not a maybe close, but WILL close another business in WA that I have been working on building up for the last 5 years.

I also target shoot as a hobby. I shoot old guns designed for lead bullets only. There is not an alternative metal for these old rifles. There are many shooters in WA shooting the old buffalo rifles like I do. This is NOT scattering lead all over the state. It is a fairly limited few target ranges. Many of them also have reclaimed the used lead.

If you want an alternative, put in more rifle ranges around the state WITH targets that reclaim the lead for reuse. The elimination of suitable shooting ranges causes the problem noted in gravel pit. Make the ranges convenient, especially to the populated areas where existing ones are being closed.

James Cornaggia
509-382-2378 (day phone at business)
jimc@castingstuff.com

From: Kelly Cornell
Sent: Saturday, October 04, 2008 8:49:34 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Kelly Cornell
1823 E. Alder St.
Seattle, WA 98122

From: John Corney
Sent: Tuesday, September 23, 2008 9:02:37 AM
To: Davies, Holly (ECY)
Subject: RE: Draft Lead CAP Cannot be Accessed at ...

“Another idea to explore with stakeholders is ways to promote more recycling of lead ammunition at shooting ranges.”

Holly – You may want to communicate with current indoors and out-doors range stakeholders. Recycling of lead is a very prevalent process now.

... Skeet and trap ranges scrape shot and scroungers gather it at nearly every range. In addition, one range that I belong to has \$600,000 reserved in the Treasury for compliance with DEP standards.

... Indoors range collect the spent brass and lead and sell to recyclers

... Outdoors ranges do the same plus scroungers digging lead out of the berms

Check the prices for scrap brass and lead. As for ingestion by wildlife and waterfowl – it’s a non issue.

PS: I have never seen in my 50 years of range shooting seen any wildlife or waterfowl or any living thing picking lead out of a berm other than scroungers. Nor is there runoffs into any water supplies. If there was, think about it ... berm destruction with expensive replacement costs!

Don’t get extreme in this area of the CAP because the impact on the environment and humans is immaterial. Stick to the wheel weights and lead sinkers. There’s the tonnage.

Regards

John Corney

From: Davies, Holly (ECY) [mailto:hdav461@ECY.WA.GOV]
Sent: 09/22/2008 2:04 PM
To: corney@comcast.net
Subject: RE: Draft Lead CAP Cannot be Accessed at ...

I would say that reasonable control starts with voluntary efforts at substitution and does not necessarily move on to any ban. We want to work with people who use ammunition to figure out exactly what is reasonable and where substitutes make sense. Another idea to explore with stakeholders is ways to promote more recycling of lead ammunition at shooting ranges.

From: John Corney [mailto:corneyj@verizon.net]
Sent: Thursday, September 18, 2008 11:48 AM
To: Davies, Holly (ECY)
Subject: RE: Draft Lead CAP Cannot be Accessed at ...

Holly, thanks for the fast reply. First link is still broken but the 2nd one works to the redirect Draft Lead CAP.

From a sportsman and ecologist viewpoint – I am for all reasonable control – substitution and banning of lead except for:

Upland small game

Shotgun shot at skeet – trap and sporting clays ranges

Single lead bullets: Substitute metals, except for zinc, are cost prohibitive (bismuth is off the market) and damaging to firearms. Zinc bullets will not shoot and shavings fill the grooves of firearm bores

Regards

John Corney

From: Davies, Holly (ECY) [mailto:hdav461@ECY.WA.GOV]
Sent: 09/18/2008 12:16 AM
To: corney@comcast.net
Subject: RE: Draft Lead CAP Cannot be Accessed at ...

I clicked on the link in your email to get to the Lead CAP website, then clicked on the link to the Draft CAP, which took me to the publications page. I clicked on the [View this publication in Acrobat PDF format](#) link and it came up.

I hope that helps. I don't know why it wasn't working for you. It's large, but I could send the pdf to you via email.

You haven't mentioned your interest, but since I have gotten a lot of comments on ammunition today, I would like to mention that there is no proposed ban on lead ammunition in the Draft Lead CAP. We would like to work with hunters and shooters to promote non-toxic alternatives to lead without negatively affecting hunting or shooting areas.

You can look at the focus sheet we prepared about lead ammunition and the Draft Lead CAP. I've attached the fact sheet to this email or you can access it at:
<http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/>

Sincerely,

Holly Davies, PhD
Chemical Action Plan Developer
Washington State Department of Ecology
PO Box 47600
Olympia, WA 98504-7600
(360) 407-7398

From: John Corney [mailto:corneyj@verizon.net]
Sent: Wed 9/17/2008 9:08 PM
To: Davies, Holly (ECY)
Subject: Draft Lead CAP Cannot be Accessed at ...

<http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/>

Why?
John Corney

From: Dana Keller Cornie
Sent: Thursday, October 02, 2008 1:55:39 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Dana Keller Cornie
1824 5th Avenue N
Seattle, WA 98109

From: bobcouchfamily@comcast.net
Sent: Wednesday, October 01, 2008 11:10:41 AM
To: Davies, Holly (ECY)
Subject: Lead Ammunition

I oppose environmental restrictions on lead ammunition. The effects of lead bullets on the environment are insignificant. However, lead bullets are an important resource for target shooters and hunters. Don't take away our lead bullets!

Bob Couch

From: Dan Coursey
Sent: Wednesday, September 24, 2008 4:16:51 PM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Holly Davies,

Why don't you people just be honest and say what you mean: you want to stop hunting and gun ownership in this state and will do it by any means possible. Liars. Shameful Liars. Absolutely NO to a lead ban in gun ammunition. This is why my family will always vote ANTI-Democrat Party no matter how you people try to spin things, and every time you pull crap like this it hurts your cause more than it ever helps. When we get rid of you frauds this will be a good place to live. See you at the ballot box.

Sincerely,
Dan Coursey
Washougal, Washington
(A real Engineer and Scientist)

From: Josh Courtney
Sent: Friday, September 26, 2008 3:12:23 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Hello Holly,

First let me thank you for the work you are doing to limit the exposure of toxic chemicals in our environment. There should be more people working to this behalf. With that said, I have read the Lead Chemical Action Plan and have a few concerns as it relates to lead used in fishing and hunting applications. First these two areas are seemingly a very small portion of the overall environmental lead levels. We have already outlawed lead ammunition when hunting for waterfowl and I agree with this decision as these birds actually dive and forage in lake and stream bottoms for food and my inadvertently ingest lead. With upland birds, and traditional rifle hunting and fishing applications these behaviors are not the case. We do not have birds, fish and deer accidentally eating lead.

As for the dangers posed to humans by lead in these applications I believe that with a good education plan in place could achieve the same result. (i.e. Handle lead with rubber gloves when fishing or coat with paint as I do with all my fishing weights)

Economically we have already seen a huge jump in the price of lead and the cost of lead substitutes. Outlawing lead would only drive the cost of lead substitutes even higher without the competition of lower priced competing alternatives.

Again, thank you for your work.

Best Regards,
~ Josh Courtney

From: Dan Covel
Sent: Monday, October 06, 2008 4:11:28 PM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

505 NW 76th St.
Vancouver, WA 98665

October 5th, 2008

Holly Davies
CAP Developer
Solid Waste & Financial Assistance Program
Department of Ecology
PO BOX 47600
Olympia, WA 98504-7600

Dear Ms. Davies,

I'm writing to you today in response to the proposed Lead Chemical Action Plan. I feel that the plan is well thought out and researched. One area does concern me, however: the topic of lead ammunition. The manner that facts are presented in the draft makes the impact of hunting and shooting seem excessive, when in fact the amount of lead introduced to the environment, while considerable, pales in comparison to other environmental threats. I applaud recommendation 10, on page 233, to not ban non-shot ammunition, and the Department of Ecology's observation that there is not currently a feasible alternative to lead based bullets. Such a ban would be akin to banning the use of petroleum products in automobiles. While there are limited alternatives, most are inferior and they are all considerably more expensive.

To bring into perspective the environmental impact of ammunition related lead on the environment, please consider the effects of mining instead. Take, for instance, the new Buckhorn Mountain mine. The mine will likely produce millions of tons of tailings over its eight year life, all of which will contain a cocktail of cadmium, mercury, a significant dose of arsenic from the leaching process, and, you guessed it: lead. A scant 2000 tons of lead ammunition for the whole state (by the worst estimate on page 105 of the draft) is minuscule in comparison. When looking at the big picture, including the effects the mine will have on the watershed of the area and the long term concerns of cleanup once the mine is no longer profitable, lead introduced to the environment by hunters is almost negligible.

Thank you for your valuable time in reading this brief response to the lead chemical action plan, and considering my opinions. I would again compliment your thorough investigation of the effects this toxic material has on our state. But I implore you to not overstate the risks of using leaded bullets in the final version of the plan, lest less knowledgeable people misinterpret these findings.

Sincerely,

Daniel Z. Covell

From: maryandart@comcast.net
Sent: Thursday, September 18, 2008 8:31:03 AM
To: Davies, Holly (ECY)
Subject: Lead

The proposal to eliminate lead bullets and shot in the state of Washington has no merit. The whole idea is way off base. For a lot of fire arms used in competition there are not substitutes. 22 rim fire and black powder rifles just to name a few. Please strike down this proposal.

Thank You,
Art Crane
1207 E 26th ave
Spokane, Wa. 99203
Maryandart@comcast.net

From: 24VCTDcrawdaddy@comcast.net
Sent: Friday, September 26, 2008 4:43:02 AM
To: Davies, Holly (ECY)
Subject: lead ban

To whom it may concern

I strongly oppose the ban of lead in ammunition for hunting or target practice in this state. The amount of exposure by the humans and animals from this sport is minimal at the worst. This will all but end rifle hunting in this state and and cause a conservation nightmare that has never been seen not to mention the economic impact on thousands of people state wide which will far out way what ever damage could be done by lead.

--

Gary R Crawford

From: mrc@pangtzu.panda.com on behalf of Mark Crispin
Sent: Thursday, September 18, 2008 2:20:58 PM
To: Davies, Holly (ECY)
Subject: Draft Lead Chemical Action Plan

6158 NE Lariat Loop
Bainbridge Island, WA 98110-2098

Dear Ms Davies:

At the current time, there is no adequate substitute for lead ammunition in all but very limited applications (e.g., shotgun shot for waterfowl hunting).

The technical means that were used to create non-lead ammunition for shotguns do not work for rifles or handguns due to the nature of the ammunition. Even for shotguns, non-lead based ammunition is of lesser availability and performance, and substantially higher cost than lead ammunition.

Evidence of deleterious effects of lead ammunition on humans and wildlife other than waterfowl is minimal or lacking entirely, and does not justify any ban on lead ammunition.

I oppose any measure at this time to ban lead ammunition in Washington State.

Sincerely,

Mark Crispin

From: chuck crissman

Sent: Sunday, September 21, 2008 11:50:14 PM

To: Davies, Holly (ECY)

Subject: lead ammunition

we have used lead for ever.lead is used for worst things than ammunition. people just wont to cry about something.lead does come from the ground. people should be thinking about our goverment a lot more to.thank you charles h. crissman from pa.my email is nam538trans@windstream.net

From: Kim Cross
Sent: Saturday, October 04, 2008 2:31:05 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Kim Cross
544 N 77th St
Suite 540
Seattle, WA 98103

From: jim crowle
Sent: Thursday, October 02, 2008 2:53:37 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

jim crowle
27319 126th PL SE
kent, WA 98030-8916

(253) 631-8480

From: Therese Cushing
Sent: Thursday, October 02, 2008 12:50:04 PM
To: Davies, Holly (ECY)
Subject: Stronger Lead Action Plan Needed

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Therese Cushing
6429 224th Avenue NE
Redmond, WA 98053

(425) 868-7651

From: Anne Daletski
Sent: Thursday, October 02, 2008 10:11:30 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Anne Daletski
1800 SE Camano Dr
Suite 540
Camano Is, WA 98282

(360) 387-7694

From: coyote303@juno.com
Sent: Monday, September 22, 2008 1:01:46 AM
To: Davies, Holly (ECY)
Subject: lead target bullets

While I in general applaud the efforts of the Dept. of Ecology to remove lead from our environment, I have to say that I am against banning lead target bullets used on target ranges.

Contrary to the report, The Lead Chemical Action Plan, lead is far from cheap for target shooters. Right now, lead can be dug up from target range backstops and reused. If the cost of shooting were to go from 2 to 7 times the current cost due to substitutes for lead, hunting would be effected but little but target shooting and the tax monies it brings in would cease to exist.

Therefore, I am against any legislation that bans lead target bullets used on target ranges where the lead can be recovered.

Chris Dallman
P.O. Box 2259
Airway Heights, WA 99001

From: Sue Danver
Sent: Thursday, October 02, 2008 7:08:46 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Sue Danver
7106 Foothill Lp SW
Olympia, WA 98512

360-75-9247

From: Ron Davidson
Sent: Thursday, October 02, 2008 8:04:30 AM
To: Davies, Holly (ECY)
Subject: Lead

We have just hosted the Northwest Regional SASS Championships here in the Tri-Cities. We had over two hundred shooters and another hundred support folks. Along with the locals there was well over four hundred people in the area for this one event. We had shooters from Alaska to California, from Washington to Colorado. These folks stayed in local motels and ate in the local dinners. If you ban lead from this sport you ban these people from these types of activity's. Consider the ripple effect on our economy as well as our sport. This is only one small shoot and we host several large one's here. We are in a location where lead contamination is at a minim or nil at best, and like so many of our types of sport we are dependent on a natural element found readily in nature.

Thank you for taking time to read this.

Ron Davidson
Operations Officer
T C S A



From: Don Davies
Sent: Saturday, September 20, 2008 9:38:24 AM
To: Davies, Holly (ECY)
Subject: Lead Ban

Dear Holly,

To keep it short, this is the worst proposal I have ever heard from any govt. or civilian group -----
EVER.

Thanks for your time.

Don Davies
P.O. Box 562
Lakebay WA. 98349

253 884-9128

From: Anna Davis
Sent: Thursday, October 02, 2008 2:23:20 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Anna Davis
122 20th Ave East
Seattle, WA 98112

From: pam davis
Sent: Monday, October 06, 2008 3:03:00 PM
To: Davies, Holly (ECY)
Subject: Lead CAP

Oct 5, 2008

Dear Dr. Davies,

I must strenuously object to the effort to ban lead ammunition. While lead and many other heavy metals may have undesirable biological consequences, I feel that you have grossly overestimated the contribution that lead containing ammunition currently plays in leads bioavailability. As you have noted, Lead shot has been banned statewide for several years now for waterfowl hunting and in numerous sensitive wetland areas. Since lead shot is no longer being used, it is misleading to base your arguments on past and present studies of leads effect on waterfowl and those animals that prey on them (that includes people). Action has already been taken to eliminate that source of "contamination". Your efforts might be better spent on cleaning up those areas. Most terrestrial animals (game animals in particular) are unlikely to ingest anywhere near the volume that dabbling waterfowl would due to the differences in feeding patterns and techniques. I live in Stevens County (NE Washington) where we have an exploding population of turkeys, which are ground feeders as well as being birds(i.e. have gizzards), their population seems unaffected by a hundred years of lead shot and bullets, oh and by the way, I have never taken 6 shots to "get" a bird or animal (that is another misestimate, I believe). The number of non game birds and animals does not seem to be diminished or effected either.

Your estimate of total lead "consumption " based on 2% population, does it account for what percentage of that population actually uses ammunition and to what extent it is used (how much per user) and how the use is distributed across the state and what that represents in weight/area. I didn't notice an estimate of the density of lead in the upper most soil layers (dry land as opposed to wetlands/ponds). Lead being a very dense element (ok alloys) any studies of how it migrates through the soil, most heavy substances sink and should become less bioavailable over time.

You note that lead is currently being mined in our neighboring county and smelted just across the border, you must also know that lead has been mined in Stevens Co. in the past. I do not think every bit of lead was mined out of our soil and ground, I suspect that economic forces ended lead mining here. So where is the lead contamination coming from, our soil, our ammunition, which is ok, which isn't???

While there may be non-lead ammunition alternatives, there are no affordable alternatives. While the amount of ammunition expended on game itself is quite small, most hunters feel it is responsible and ethical to be proficient (practice=\$\$\$). I wonder then if this is yet another way to make shooting sports more expensive and another effort to get rid of guns. I believe a 2nd amendment argument could be made against this portion of your program, as arms are not very effective without affordable ammunition.

And finally, I have eaten game all my life (60+) years and have not experience any lead exposure effects (although if you bother to read this and my "logic" doesn't seem logical, you may question my last statement). I would be happy to offer my body to science and/or willing to bare (bear?) witness to lead ammunition's non effect biologically.

In closing, I urge you to remove the proposed prohibition against lead ammunition in the lead CAP, as I believe its negative contribution to this "problem" is negligible and your efforts money and energies would be better spent on other sources.

Thank you,

Paul Davis (509) 233 9074

From: randie.davis@comcast.net
Sent: Monday, October 06, 2008 2:48:54 AM
To: Davies, Holly (ECY)
Subject: FW: Lead CAP

----- Forwarded Message: -----

From: randie.davis@comcast.net
To: www.hdav461@ecy.wa.gov
Subject: Lead CAP
Date: Sun, 05 Oct 2008 17:42:37 +0000

Hello;

Adapting a no lead policy in the State of Washington, or for that matter any state, would be very damaging to the economy. In these times we do not need anymore problems.

This would cause problems to numerous to list, i.e. the fishing industry, shipping, and transportation. The sportsmen and competitive shooters, summer and winter Olympics. I feel the majority of us are well aware of the problems with Lead. Banning it would be a disaster.

Regards

Randie Davis

5126 N. Alto, Ln

Oak Harbor, Wa 98277

From: Bob Davis

Sent: Friday, September 26, 2008 6:23:03 AM

To: Davies, Holly (ECY)

Subject: Lead Chemical Action Plan

Dear Ms. Davies,

I am an avid sportsman. The majority of my shooting is target shooting using lead ammunition. There is no adequate substitute for lead ammunition for target shooting of shotgun and pistol. Any affects on humans and wildlife do not justify a ban as recommended by the Department of Ecology.

Robert Davis

Bainbridge Island, WA

From: lpdawes
Sent: Thursday, September 25, 2008 3:02:31 PM
To: Davies, Holly (ECY)
Subject: We are AGAINST a ban on lead ammunition!!

The draft Lead Chemical Action Plan that the Dept of Ecology has released for comment has us VERY disturbed. There is no adequate substitute for lead ammunition and any effects on humans and wildlife do not justify a ban as recommended by the Dept of Ecology. Since ammunition bans are on the minds of many people involved with the CAP project, we believe the CAP is a preliminary step that will lead to the promotion of a legislative or regulatory ban on lead ammunition. We are AGAINST ANY ban on lead ammunition!!

Mr. & Mrs. Lawrence Dawes, 5213 Blue Heron, West Richland, WA 99353

From: Jim Dawson
Sent: Wednesday, October 01, 2008 1:42:28 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Chemical Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Jim Dawson
530 Ensley Ln. SE
Tumwater , WA 98501

360-292-8540

Ms Holly Davis
Dept of Ecology,

The proposed lead ban (**CAP will turn gradually into a ban as demonstrated in other states**) is simply another governmental ploy to take away more individual rights. The end results will be more far-reaching than simply to gun owners. Lead shot is another issue and I support its restriction in areas of hunting wild fowl as there are reasonable alternatives available.

I seldom use any ammunition except at enclosed shooting ranges, but when I do hunt or target practice I don't want your agency's interference in my constitutional rights. Your agency might have its place, but I even wonder about that sometimes.

Lead is found in its natural state everywhere in the world. You are a part of an agency, and there are others, that is slowly legislating/eroding away the rights of American citizens in many areas of American traditional life.

In its beginning the EPA was given entirely too much authority (my opinion) and has entrenched itself to the point that many millions of jobs have been off-loaded to other countries over the years because American businesses can't possibly comply with impossible deadlines and NEW regulations. American companies have been forced into off-loading jobs to countries where the actual environmental impacts are much much worse than were ever seen here in the good old USA. Eastman Kodak in Mexico is an example –and look closely at China for some really bad examples and yet we purchase the products that come out of those many other countries which to me is downright hypocrisy.

Ever wonder about *our* economy? How much economic disaster across America is to be placed at *your* agency's door step in terms of job loss? What will this proposed action do to individual personal rights in the future as it ascends a biased political ladder according to some outlandish agenda that may not even be yet written in its entirety?

Thanks for your time,
David Day

cc:
Governor Chris Gregoire
file

From: Bob Decker
Sent: Saturday, October 04, 2008 5:30:37 AM
To: Davies, Holly (ECY)
Subject: lead bullets

I think most hunters and target shooters would accept the "No Lead" bullets, BUT there should be a few years to exhaust present supply.

Thank You

Bob Decker
bob98019@yahoo.com

From: melissa degregorio
Sent: Thursday, October 02, 2008 10:38:58 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

melissa degregorio
1361 hertel ave
buffalo, NY 14216

From: Joe DeGroat

Sent: Sunday, September 21, 2008 2:35:29 AM

To: Davies, Holly (ECY)

Subject: Proposed ban on lead ammunition

The proposed ban on all lead ammunition is not acceptable. Firearms ranges where large volumes of ammunition are used already require lead free practice ammo and the sport is largely self regulating. However this type of practice ammo is not sufficient for hunting, certain rifle target sports, or self defense. There is no adequate substitute for ammunition containing a lead core in these applications. The limited use of lead core bullets has virtually no affect on the environment or the health and welfare of the public. I view this as a gross abuse of governmental authority and highly suspect that this proposal has arisen as an attempt to restrict the freedoms of hunters and citizens who wish to own and use firearms per their constitutionally guaranteed right. Any affects on humans and wildlife from this type of ammo are imaginary and there is no legitimate justification for this ban as recommended by you and the Department of Ecology. Lets have some common sense here and quit trying to mess with our freedoms.

Joe DeGroat

From: Kenneth Delanoy
Sent: Friday, September 26, 2008 2:48:54 AM
To: Davies, Holly (ECY)
Subject: Re: Lead Chemical Action Plan

Holly Davies (ECY),

You maybe sincere with you comments but the lead bans in other states have developed from very similar studies and your reference Cornatzer and his position that has shown lead in wild game meat. If you read the article I sent about his study of wild game meat in North Dakota after he x-rayed the meat to fine fragments from the bullet and took a pinch of meat with the fragment and sent to a respected lab in Iowa. What happened to random sampling as the lab suggested? This guy has an agenda.

Here is the NRA's view and I agree: Page 208 of the CAP states, "Products that do not need lead and directly expose wildlife include wheel weights, small fishing weights, and some ammunition." NRA infers from this that if the CAP suggests some ammunition "does not need lead" then such ammunition should be banned and made from alternative materials. The plan includes a cost analysis of banning lead shot. If a ban is not a consideration then why is the Department of Ecology analyzing the cost of such action? Recommendation 9 on Page 235 of the CAP calls for a phase out of lead shot. "Phase out" sure sounds like "ban" to the NRA.

While it cannot be proven at this time, NRA can just about guarantee that lead ammunition bans are on the minds of many people involved with the CAP project. Given what we are seeing in other states by environmental-leaning government agencies and legislatures, this is not much of a stretch. And with the discussion of green bullets in the CAP, it is doubtful that the next steps will be far behind.

Examples from other states include California, where hunters were asked to voluntarily use non-lead ammunition in areas occupied by the California condor. Within two years, the request was replaced with a legislative ban on hunters' use of lead ammunition. In Arizona, the same request was made of hunters, but as soon as the California ban was signed into law, lead-ban proponents started their attack in Arizona. A symposium was held in Boise, Idaho on lead ammunition in June at which almost all speakers supported a ban on lead ammunition, regardless of cost, performance, or availability of substitutes. NRA believes the CAP is a preliminary step that will lead to the promotion of a legislative or regulatory ban on lead ammunition.

Sincerely,

Kenneth Delanoy

----- Original Message -----

From: Davies, Holly (ECY)

To: Kenneth Delaney

Sent: Tuesday, September 23, 2008 9:53 AM

Subject: RE: Lead Chemical Action Plan

Thank you for sending in your comments on the Draft Lead CAP. There is no proposed ban on lead ammunition in the Draft Lead CAP. We would like to work with hunters and shooters to promote non-toxic alternatives to lead without negatively affecting hunting or shooting areas.

Please take a look at the focus sheet we prepared about lead ammunition and the Draft Lead CAP. I've attached the fact sheet to this email or you can access it at:

<http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/>

I will not deny that there are some people who want to use the small amount of lead that has been found in game to ban all lead ammunition. I have met those people, but I am not one of those people and Ecology is not recommending any ban on lead ammunition. Nor are we recommending that anyone avoid eating game.

While there have been no human "poisonings" due to eating game shot by lead ammunition, there is also no known safe level of lead for developing children. I've seen data from Cornatzer and other people that shows some lead in game meat. All sources of lead add up to our total exposure. People should be aware of this and be able to make their own decisions.

Sincerely,

Holly Davies, PhD
Chemical Action Plan Developer
SWFAP/ Industrial
WA Department of Ecology
PO Box 47600
Olympia, WA 98504-7600
Phone: 360.407.7398
Fax: 360.407.6102

From: Kenneth Delanoy [mailto:delkb@msn.com]
Sent: Monday, September 22, 2008 4:58 PM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Dear Holly Davies, Department of Ecology,

Washington state Department of Ecology has a plan if enacted it will affect every gun owner in the state. Washington State has very good firearms policies that support hunting, shooting and general gun ownership. Why then kill these programs that help make Washington State the Evergreen State and very popular as a place to live and raise a family. I oppose this plan that has gun ban written all over it!

The lead ammunition we use for hunting as well as target and competitive shooting is in jeopardy. If the state's Department of Ecology has its way, lead ammunition will be banned from purchase, use and ownership in the state of Washington. Lead ammunition is a target of a series of recommendations in the "Lead Chemical Action Plan" prepared by the Department of Ecology.

There is no adequate substitute for lead ammunition and that any affects on humans and wildlife do not justify a ban as recommended by your Department of Ecology.

California raises California Condors and lab test on dead Condors showed they had high levels of lead. They drafted legislation for a lead free ammunition zones in the state and the governor signed it into law. Another lab study found that the lead was not firearms ammunition lead. A biased study of wild game meat was done in ND to determine the health effects due to lead from the bullet that killed the animal. Hunters were donating portions of their kill to feed the needy at food banks. That state threw out a large portion of the donated meat because of this study which turn out flawed and other states used another lab and their test found the meat was safe for human consumption. I have attached an article on lead ammunition you might find interesting. These animal rights people will stop at nothing to ban hunting.

Sincerely, Kenneth Delanoy

From: Mike Denall
Sent: Tuesday, September 23, 2008 1:30:25 PM
To: Davies, Holly (ECY)
Subject: Lead in bullets

Please,

There is no adequate substitute for lead ammunition and that any affects on humans and wildlife do not justify a ban as recommended by your Department of Ecology.

Do not do this to us.

Mike Denall
Bremerton, Wa
98311

From: Stephanie Develle
Sent: Sunday, October 05, 2008 3:06:26 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

As a pediatrician and mother, I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Stephanie Develle
12815 76th Ave NE
Kirkland, WA 98034-5713

425-814-9873

From: Vermillion, Kathy (ECY)
Sent: Tuesday, October 07, 2008 12:40:28 AM
To: Davies, Holly (ECY)
Subject: FW: Please strengthen Lead Chemical Action Plan

-----Original Message-----

From: Stephanie Develle [mailto:stephanie.develle@gmail.com]
Sent: Saturday, October 04, 2008 11:24 AM
To: Vermillion, Kathy (ECY)
Subject: Please strengthen Lead Chemical Action Plan

As a pediatrician and mother, I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- . Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,
Stephanie Develle, MD, FAAP

From: NED DILLMANN

Sent: Friday, September 19, 2008 1:10:44 AM

To: Davies, Holly (ECY)

Subject: Ecological Restrictions on Lead Ammunition

I feel tjis is just another approach to banning firearms in the state of Washington.I have not seen any viable info that proves that lead in rifle/pistol ammo has had any effect on the enviormen or on any species living in same.Lead shotgun or shot in general yes.Substitute materials do not exist that equal leads perfomance.

NED DILLMANN

From: Marcie Dingerson
Sent: Thursday, October 02, 2008 1:48:08 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

Please, Please, Please, until you have walked in our shoes and find out your son is so full of lead. He's number is so high we were told to call the Department of Health. They said they would not do anything to help until the number reached 20 my son was an 18. To carry and delivery this child and to know I let this happen to him kills me but as I think about it, it's not my fault it's everyone who thought it was ok to put lead in products. Please get out the lead and save our kids.

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely, Marcie

Marcie Dingerson
18416 Melon St sw
Rochester, WA 98579

From: acdodd
Sent: Wednesday, October 01, 2008 5:48:40 AM
To: Davies, Holly (ECY)
Subject: Lead Ammunition

I have read the Lead CAP and I am very concerned.
This appears to be a thinly veiled attempt to ban all lead ammunition in the state of Washington.
There is NO viable alternative to lead ammunition.
Tungsten nyclad ammo is ILLEGAL for us common folk to use as it is Armor Piercing.
Your true goal must be a backdoor gun ban.
No ammunition, no guns.
Hopefully after the next election we will have a new Governor and maybe he will put a stop to this foolish Californification of Washington.
A voting gun owner.
AC Dodd

From: Joe Dodd

Sent: Friday, September 19, 2008 11:56:31 AM

To: Davies, Holly (ECY)

Subject:

Nice try Holly, but you are misinformed as to the ground water contamination danger from lead bullets. There is none, zilch, zero. Where do you think the lead came from before it was made into bullets? The ground. Far more lead still resides beneath the ground than that which lives above.

Appears to me, and other retired engineers like myself, that the sole purpose of this attempt is to ban ammunition. Am I right? Just another power struggle between those who enjoy their 2nd Amendment rights and people like you who just flat out hate guns.....period.

Why can't you at least have the courage to be honest with the public at large concerning your real agenda? Sorry Holly, but YOU and those who believe like you are WRONG!

Have a nice day Holly.....Joe Dodd

From: Jennifer Dold
Sent: Thursday, October 02, 2008 7:10:02 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Jennifer Dold
7048 18th Ave NE
Seattle, WA 98115

526-9003

From: cindy dominguez
Sent: Friday, October 03, 2008 6:45:56 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

cindy dominguez
2031 Maiden Ln.
Wenatchee, WA 98801

From: RICK DONOHUE
Sent: Monday, September 22, 2008 3:21:57 PM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Attention: Holly Davies, Dept Of Ecology

Please let the council know that I am against the ban of lead ammunition as there is no adequate substitute at this time, and I feel the impact to both humans and animals would be small compared to the lead from all types of batteries, printed circuit boards in all types of electronic equipment, etc.; all which are discarded regularly! Thank you for considering all options and consequences before making any decisions.

Rick D. Donohue
rickddonohue@hotmail.com



Stay up to date on your PC, the Web, and your mobile phone with Windows Live. [See Now](#)

From: Gene Dotson
Sent: Friday, September 19, 2008 1:15:45 PM
To: Davies, Holly (ECY)
Subject: comments lead chemical action plan

Ms Davies,

I am writing to comment on the section of the draft plan concerning the recommended ban on ammunition containing lead. I am disappointed that the Department of Ecology would make such a recommendation using the odd variety of data sources listed. Many of the sources were taken from other states. I submit that using data such as Wisconsin's 5 offal piles per sq/km is misleading. Wisconsin has a much deer higher harvest rate per hunter than Washington State. Thus many more offal piles are available for scavenger and raptors to feed on. Where is such data from Washington? You also use the California Condor issue to press your case. As the plan states the last sighting of a condor in Washington was in 1904. Unless there is a plan to reintroduce condors into Washington State then this information should have no influence on the ban in this state. I would expect your department to conduct studies that are current and pertinent to Washington. This plan relies heavily on a single source report from the Washington State Dept of Fish and Wildlife from 2001. This may be a good report but it is still a single source with no other corroborating data. On page 101 Bald Eagles are discussed. It is stated that in 1974-1975 more than 100 bald eagles were poisoned by lead shot. This does not say if these eagles died or not. This is also a nationwide figure and does not indicate how many were in Washington State if any. It also stated that this was before the lead shot ban for migratory bird hunting. What are the current figures since the ban. Your plan then states that in 2008 two bald eagles died at WSU of lead poisoning. This insinuates that it was caused by lead ammunition however you provide no data to back this up. The source of the lead is not identified. Was it really lead ammunition or some other source. Further on pages 101 and 102 the lead poisoning of swans is discussed. This segment leads the reader to believe that the swans were poisoned in Washington but the facts are not clear. The main source of the lead was from Judson Lake which is in both Canada and the US. The time frame of listed is after the lead shot ban in the US so I must assume that the lead came from Canada. Banning lead in Washington State would not have prevented this from happening.

When I reviewed the list of the advisory committee members I see that all concerned groups are represented except for the shooting sports and ammunition group. Under the recreation heading only fishing is represented. Was this an oversight or was it intentional?

I understand that lead is a hazardous substance however the information in this plan does not convince me that the minor exposure from hunting ammunition is a public health hazard. After reviewing this Draft Plan I must urge your Department to reject the section regarding banning lead ammunition due the poor factual data used and lack of representation on the advisory committee. This section of the plan uses misleading data and information from states that are a different make up from Washington State. Because of this I must believe that this section is politically motivated not health or environmentally driven.

Wayne Dotson

From: Paulette Doulatshahi
Sent: Friday, October 03, 2008 12:05:40 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Paulette Doulatshahi
4525 Ferncroft Road
Mercer Island, WA 98040

(206) 232-5184

From: Maurice
Sent: Friday, September 26, 2008 11:36:48 AM
To: Davies, Holly (ECY)
Subject: Draft Lead (CAP)

Miss Davies

After reading the draft in the Chemical Action Plan (CAP) regarding lead in ammunition and the lead used in fishing. Your reaching into areas that is not necessary to control hazardous materials in the environment. The amount that is used every year in hunting and fishing is miniscule as compared to some of the other things out there. Banning the use of lead used in waterfowl hunting I can see as they were eating it in there food. But banning lead in ammunition used for deer, elk, and sport shooting is absolutely uncalled for.

You applied this same back door approach in California and Arizona. Within two years after you succeeded in banning any type of ammunition containing lead.

Your agency needs a independent committee to oversee your actions and revue the things you are doing.

Please reconsider your thinking on this.

Thank You
Maurice L. Drumm

From: Suzanne Duley
Sent: Thursday, October 02, 2008 8:53:26 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Suzanne Duley
811 16th Ave
Seattle, WA 98122

From: suzanne duncan
Sent: Thursday, October 02, 2008 9:33:57 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

suzanne duncan
3056 218th ave se
samammish, WA 98076

From: Michael J Dunn
Sent: Sunday, October 05, 2008 12:13:50 PM
To: Davies, Holly (ECY)
Subject: Opposed to any Lead Bullet Ban

Dear Sirs,

I am submitting comment on the "Lead Chemical Action Plan" available in draft form.

I do not see any compelling reason to apply any bans, voluntary or legislatively mandated, over the use of lead in ammunition. By the Plan's own arguments, most human exposure comes from ingestion, which is not a factor regarding ammunition. At one point, the Plan alleges that there is no "safe" level of lead exposure...yet on page 20, it states "Although currently no threshold for lead's health effects has been clearly identified, it is possible that one exists and that some exposures may cause little or no harm." As a matter of general toxicology, there is every reason to expect that such a threshold exists.

The plan treats all forms of lead as interchangeable and mutually equivalent. Lead occurs as the metal only artificially, but exposure to the environment will convert it to one of several oxides (lead dioxide, lead sesquioxide, lead tetroxide, and lead oxide). These oxides are either poorly soluble or insoluble in water. They are capable of reduction by the hydrochloric acid in digestion, which is why the toxic risk is associated with digestive ingestion. The Plan's discussion of lead toxic risk admits in many places that it is extremely difficult to quantitatively assess the risk level for various modes in which lead may be present in the environment (house paint, soil, water, food, air). Moreover, the data appear to show that levels in blood have been declining for the past 3 decades.

Lead is indispensable to ammunition (projectiles) for reasons of malleability, density, fusibility, availability, and cost. Alternatives are more expensive, by reason of using less convenient materials or involving different and complicated processing. Lead styphnate priming compound is already being phased out. The statement made in the Plan (p. 98) that lead bullets "fragment" inside game is an unwarranted generalization. Slug projectiles not requiring extensive expansion will generally remain intact. The major concern appears to be with respect to hunting fowl, and that has already been addressed by the banning of lead shot, so it is difficult to understand why this question remains to be considered within this Plan.

An entire population within the "groups affected" (p. 99) has been omitted: those who keep or carry firearms for home or personal protection. This population vastly outnumbers law enforcement officers. This population may not be affected by lead exposure to any significant extent, but they would certainly be affected by any lead ban that affects the kind of ammunition they would be able to use for their self-protection.

On p. 105, the Plan presents estimates of lead shot use in the State of Washington that varies over a range from ~ 100 to ~ 2000 metric tons. A 20:1 range in estimate is simply not acceptable as a basis for moving forward with any recommendation.

In short, the Plan seems to veer between alleging the presence of severe toxic threat, and admitting that minimum thresholds of toxicity are not known. It therefore adopts a "zero tolerance" posture, which is not scientifically tenable. Any toxic risk from ammunition is already being dealt with by the banning of lead shot and the disuse of lead styphnate. Problems of contaminated soil at shooting ranges is properly a range cleanup issue, not an ammunition issue. The Plan's estimate of ammunition usage in the State of Washington is not reliable. For all these reasons, as well as the imposition of cost and inconvenience of any lead prohibition in non-shot ammunition, I recommend deleting the consideration of ammunition from this Plan until and unless a stronger scientific case can be made that a risk exists.

Michael J. Dunn
3933 South 326th Place
Federal Way, WA 98001-9639

(253) 838-5820

From: Kevin Eager
Sent: Tuesday, September 23, 2008 2:01:42 PM
To: Davies, Holly (ECY)
Subject: Lead Ban

I do not support any proposed legislation to restrict the use of lead ammunition.

There is no adequate substitute for lead ammunition. Any potential affects on humans and wildlife do not justify any restrictions, much less a ban.

From: Dee Dee Eaton
Sent: Friday, October 03, 2008 5:26:12 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Dee Dee Eaton
912 Wash Ave S, Box 444
Suite 540
Long Beach , WA 98631

3606421166

From: greg eckert
Sent: Friday, September 26, 2008 12:30:03 AM
To: Davies, Holly (ECY)
Subject: lead cap

Holly Davies,

I do not agree with the Lead Chemical Action Plan. There is no adequate substitute for lead ammunition and any affects on humans and wildlife do not justify a ban(phase out) as recommended by the Department of Ecology.

Thanks,

--

Greg Eckert

From: Marianne Edain
Sent: Thursday, October 02, 2008 8:48:05 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Marianne Edain
Box 53
Suite 540
Langley, WA 98260

From: myconanc

Sent: Tuesday, September 23, 2008 2:18:07 AM

To: Davies, Holly (ECY)

Subject: Lead bullets and shot

It is my understanding that the Dept. of Ecology is considering banning lead bullets and shot. Lead shot and bullets Do Not cause pollution in the soil, it remains in the state it has been deposited in. Lead bullets and shot does not degrade unless ingested, and is put into solution by acid. You can go to any civil war battle ground and find bullets fired more than a century ago and they are the same as the day they were fired more than 100 years ago. Those same fields, and the ones in Washington that are indeed contaminated, were infused with lead from fuels used by generations of farmers and their gas powered machinery. Not by hunters and their ammunition. Our shooting ranges recover and recycle lead all the time. To consider lead bullets and shot as a culprit to pollution is wrong. Particularly, when compared to the millions of tons of lead spread by leaded fuel exhaust, which like our bullets does not degrade, and is in a state that can be absorbed so readily. Hunters have addressed the need for lead to be removed from sites where fowl are in jeopardy, with steel shot.

It is my belief that this action against lead use in firearms is a backdoor attempt to fit the needs of anti-gunners/hunters. Sportsmen's use of lead is insignificant compared to any others who use lead that has been put into solution in fuels and plastics, and paints etc.

You may contact me via e-mail
or my street address:

Ed Edmiston
670E Crestview Dr.
Shelton, Wa.
98584

From: John Edwards

Sent: Saturday, September 20, 2008 10:55:34 PM

To: Davies, Holly (ECY)

Subject: Back Door Gun Control...Banning Lead Bullets

Holly Davies, Dept. of Ecology.....Well, it looks like The American Revolution will never be over...There are always going to be tyrants in powerful positions working hard to destroy the freedoms that our Constitution, and many wars against foreign enemies have tried to keep for us...The Supreme Court recently ruled that Americans[the people that is, not the government] have the right to bear arms..just like our Constitution says....Im not by myself..Millions of law-abiding citizens, just like myself are sick, and tired of freedom robbing tyrants in power positions coming up with backdoor schemes for gun control...You cant take our guns away, so you will attempt to take bullets away....You will eventually awaken a sleeping giant with your schemes...Real Americans wont stand for much more!...Sincerely.....JOHN WESLEY EDWARDS...U.S.A. CITIZEN.....

From: Lynn Edwards
Sent: Saturday, October 04, 2008 11:57:07 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Lynn Edwards
531 N 70th St
Seattle, WA 98103

From: Frederick Elkins
Sent: Thursday, October 02, 2008 9:41:29 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

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Sincerely,

Frederick Elkins
3329 35th Ave South
Suite 540
Seattle, WA 98144

From: Carrie ellis
Sent: Friday, October 03, 2008 3:31:25 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

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Sincerely,

Carrie ellis
1620 S 252nd St
Des Moines, WA 98198

From: Sandra Emerson
Sent: Saturday, October 04, 2008 5:16:18 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

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Sincerely,

Sandra Emerson
820 NE 8th St
Suite 540
North Bend, WA 98045

From: William Joseph Emerson
Sent: Tuesday, September 30, 2008 12:05:36 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Dear Mrs. Davies:

Please consider my objection to the Lead Chemical Action Plan. There is no good alternative to lead for shot. As it is used for upland birds and wild game, I see no harm to the environment. Like many other things, used properly when loading or working with it there is no harm to people or its users.

Thank you
Wm Joseph Emerson
1055 University St.
Walla Walla, WA
99362
e-mail wmjsphemerson@gmail.com

From: hvacschool
Sent: Tuesday, October 07, 2008 1:49:57 PM
To: Davies, Holly (ECY)
Subject: CAP Draft review

Holly Davies
CAP Developer
Solid Waste & Financial Assistance Program
Department of Ecology
PO BOX 47600
Olympia, WA 98504-7600

Dear Ms. Davies.

I did receive the CAP draft proposal on September 29 in the post. Thank you for your prompt attention in sending it to my office.

Although the time was short, I did have the opportunity to review most of the draft.

Although the proposal was well written, I have a number of concerns about some of the information in the document.

(p.99) Lower section " Fishing, hunting, shooting release hundred of tons of lead into the environment every year which adds to the lead exposure for people and wildlife."
There appears to be no reference how this number was determined. This should be struck from the draft until it can be substantiated with a higher degree of accuracy.

(p.101) Although swan deaths appear to be attributed to lead poisoning from feeding from a lake bottoms, a conclusion to further restrict lead in non-aquatic situations does not appear to be warranted. Lacking in the discussion on this page was death rate of swans prior to the lead shot ban. Also lacking was an explanation to what had changed in Judson Lake that may have caused this increase mortality.

(p. 102) There appears to be some jumping to conclusions about the deaths of the 10 of the 18 condors that were tested for lead - the condors death that may have resulted from neural degeneration of lead.

The result of this was to ban hunters from using lead based ammunition, but the study of these deaths over looked 2 other viable causes. One was earlier mentioned about the effects of leaded gasoline on the road corridors. Rodents feeding on the plant material and apparent plant material may have ingested small amounts and were consequently were eaten by the condors.
Also, the study did not mention the wide spread dumping of computer and TV monitors in rural areas. This may be a realistic answer to the unknown cause(s) of the elevated lead levels in birds of pray, condors and other wildlife.

In summary, since the amount of lead entering the wildlife areas is not substantiated and other more reasonable factors - dumping computer monitors in these areas was not addressed, any conclusion to further abate or restrict the use of lead based ammunition outside of aquatic areas can not be justified.

I further ask that the comment period be extended on CAP draft for at least 90 days.

Thank you for your consideration of these comments.

Sincerely yours,

Head Master Engelking, P.E.
10.06.08

From: Pamela M. Engeln
Sent: Thursday, October 02, 2008 2:10:22 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Pamela M. M Engeln
7022 - 21st Avenue NE
Seattle, WA 98115

(206) 526-5984

From: WADE ERICKSON
Sent: Friday, October 03, 2008 12:39:14 AM
To: Davies, Holly (ECY)
Subject: Lead Ban

I am opposed to this lead ban. There is no adequate substitute for lead ammunition. The affects on humans & wildlife do not justify a ban. Solid lead that gets covered up by soil stays in solid form even if lying on the ground or in the water exposed to the elements will stay solid for a very very long time! The amount of lead from ammunition & or fisherman is a very minuscule percentage of all the lead that goes into the environment. Why then are you trying to ban the use of these products? Nothing better to do with your life? Come on get real!!! Get after the areas that are really a concern of pollution stop wasting our tax dollars on trying to control us sportsman!

Capt. Wade Erickson
Fish-On! Charter/Guide Services
17107 West Lake Goodwin Rd
Stanwood Wa. 98292
Hm. 360-652-2359 Cell 206-914-3474
www.fishon-gs.com
Good Fishing To All!!!

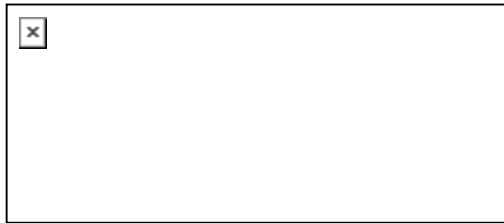
From: Shannon L. Ericsson
Sent: Thursday, September 18, 2008 4:05:48 AM
To: Davies, Holly (ECY)
CC: ILA-CONTACT@NRAHQ.ORG
Subject: Lead ammunition chemical action plan

Dear Ms. Davies,

Please reconsider this invasive and unnecessary plan for Washington state. Myself and many of my friends have hunted in Washington state since the '50s. **There is no conclusive evidence that a systemic statewide contamination that can be traced to lead ammunition exists in our state.** Therefore, it is clear that this chemical action plan is a breach of our lawful rights to pursue hunting in the manner we have for decades. This plan is not justified or necessary. I respectfully appeal to the leadership of the Dept. of Ecology to cease this plan and not further encumber the citizens right to bear arms and enjoy our great state wilderness recreational areas.

Thank You for your Consideration,

Mr. Shannon L. Ericsson
President / Senior Staff Consultant
OMEGA CONSULTANTS, INC.
Ph: 360-75-7205
F: 360-75-7206
shannon@omegacorp.us or shan@inc.com



From: Jennifer Eveskcige
Sent: Thursday, October 02, 2008 12:42:27 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Jennifer Eveskcige
2421 103rd ave. E.
Unit B4
Edgewood, WA 98372

(360) 279-0198

From: Liza Ewell
Sent: Thursday, October 02, 2008 12:03:11 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Liza Ewell
3235 NW 66 Street
Seattle, WA 98117

From: Ewer, Vernon D (Dave)

Sent: Tuesday, September 30, 2008 1:26:34 AM

To: Davies, Holly (ECY)

Subject: Possible lead ban proposal

I work on 10 firearms training ranges operated by the Department of Energy and also shoot on the Rattlesnake Mountain Ranges a short distance from home. I believe in-acting any laws no matter what the intent aimed at banning, Lead, Powder, Primers, Shot, etc., shooting need to be arrested sooner rather than later. thank you.

Captain Vernon "Dave" Ewer
Hanford Patrol

(Vernon D. Ewer)
In God We Trust

From: Jim Fagerlie
Sent: Friday, September 26, 2008 10:59:43 PM
To: Davies, Holly (ECY)
Subject: proposed lead ammo ban

Ms Holly Davies

I urge you to put no further ban on lead ammo in Washington State (currently waterfowl ammo has lead ban-I supported that ban)

Respectfully submitted

Jim Fagerlie
12014 20th st se
Everett, WA 98205

From: Dean Fay
Sent: Saturday, September 20, 2008 4:42:52 AM
To: Davies, Holly (ECY)
Subject: Propsed lead ban

I am writing to express my strong displeasure with the Department of Ecology proposal to ban lead from hunting ammunition. What made sense for waterfowl shot shells does not have a logical fit for big game ammunition. Waterfowl return to the same location each fall and the build up of lead in those areas created a problem. Likewise with the California Condor. They live in a limited area. Washington big game animals cover the entire state and the amount of ammunition is not significant given the vastness of the land mass. What makes sense for California and the Condor is not good for Washington and the big game that live there.

To date there is not a readily available alternative to lead ammunition for rifles. Few companies make a non-lead bullet and those that do have a limited supply of an even further limited selection. The reason is simple. There is no real need. Washington should not ban lead ammunition just because other states or countries are doing so. I would point out that even the Washington Department of Wildlife Biologist to not mandate lead shot shells in all of the state owned hunting areas.

Maybe the Ecology Department staff is unaware that the lead shot at trap and skeet ranges is reclaimed and then reused. It is not left in the ground. Neither do these areas pose a threat to wildlife because the use of facilities deters animals from being there. To stop the use of lead shot at these places would simply cause the lead to stay in the ground. There would be no incentive to reclaim an unmarketable substance.

This proposal is ill-conceived. Neither is the comment period long enough to those effected to adequately respond. Unfortunately, state agencies often make up their collective mind about what they intend to do and really do not consider the effects on the end user or even allow for adequate response to the proposals.

Dean Fay

From: Kellie Fay
Sent: Thursday, October 02, 2008 7:45:22 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am currently working towards my PhD in toxicology. In all of my studies, no other chemical has been highlighted as being so detrimental, even at extremely small exposures, to children's developing brains than lead. This is an exposure we have the power to minimize and I feel have a moral obligation to minimize. Effects on IQ, attention, anger management and even criminal behavior have all been highly associated with lead exposure, even at levels far below the current 'acceptable' level of 10ug/dl blood.

As a mother of two small children, this lead action plan is especially dear to my heart. Please support this lead action plan to help protect our kids and promote healthier, smarter, kinder, and more productive Washingtonians.

Sincerely,
Kellie Fay

Kellie Fay
8518 20th ave NW
Seattle, WA 98117

(206) 297-3185

From: Dan & Sharon Felton

Sent: Friday, September 19, 2008 5:37:50 AM

To: Davies, Holly (ECY)

Subject: lead

Ms. Davies,

I do not believe tha tbanning lead for use in bullets is supported by any real science. I have read the various essays on banning lead and I do not find any real proof that would cause me to believe that lead is responsible for the harm that some attest to. I am a shooter and a hunter and there are not suitable and affordable replacements for lead in bullets. I would like to go on record as opposing any ban on lead for the use in ammunition.

Sincerely,

Daniel B. Felton
dafelton@charter.net

From: Mike&Vicky

Sent: Friday, September 19, 2008 1:28:31 AM

To: Davies, Holly (ECY)

Subject: Lead

Gentlemen

It has come to my attention that once again Government is attempting to fix a problem that does not exist. Self serving individuals and programs are not what has made this country GREAT... it is what is destroying the very freedoms that were paid for in BLOOD.. and certainly not yours.

If baby's were dropping dead by the scores I could understand. If the hospitals were chocked with lead suffering patients I would stand by your side. But there are NONE ! Lead.. a natural mineral has been in the water ,soil, and air since the first volcano erupted, since the first stream began flowing. The problem is not the normal use of lead through all buisness... the problem is certain Popularity seeking, self serving individuals that have more money and time on their hands than the average person trying to make a living.

Thank you.... I Vote !

Michael Fester

From: Eric Fickeisen
Sent: Thursday, September 18, 2008 4:15:29 AM
To: Davies, Holly (ECY)
Subject: lead hunting ban

For heavens sake, I hope the officials in Washington have better things to do than worry about lead hunting ammunition. More ridiculous wasteful use of public funds. I vote and I will vote with my feet. I'm moving my little company of 25 employees to Idaho. I just can not take it anymore, the nanny state saving me from myself. my tax dollars are leaving.

egf.

From: Fieldsyelm@aol.com
Sent: Monday, September 22, 2008 10:15:46 AM
To: Davies, Holly (ECY)
Subject: Leaqd Bullets

I am a 38 yr old female voter who sometimes hunts and often target shoots with my husband and friends. If people were as concerned about chemicals in food as lead in bullets we'd all be okay. As it is, the amount of lead in bullets and how much they are handled should pose no concern to anyone. This appears to be a veiled attempt to make things more difficult for gun owners, and I for one can exercise my right to vote by choosing candidates who don't play around with my 2nd amendment rights in any way, shape or form.
Sincerely, Tanya Fields, Yelm, WA

Looking for simple solutions to your real-life financial challenges? [Check out WalletPop for the latest news and information, tips and calculators.](#)

From: Rubylee Findley
Sent: Thursday, October 02, 2008 9:03:54 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Rubylee Findley
4122 81st Pl NE
Marysville, WA 98270

360-653-1970

From: Howard & Mindi Finke

Sent: Wednesday, October 01, 2008 12:33:32 PM

To: Davies, Holly (ECY)

Subject: lead

Leave our lead alone. Sportsmen vote do you like your job that we provide for you ?

Howard Finke

From: Greg Fiorentino
Sent: Sunday, September 28, 2008 3:07:33 AM
To: Davies, Holly (ECY)
CC: paul@vrpc.us
Subject: Draft Lead CAP Comment

Holly Davies
Dept of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Dear Ms. Davies:

I have been a resident of Washington for the past 10 years, and am a registered voter. I have a university degree and have studied Chemistry at the university level as well as philosophy of science, experimental design and statistics.

I am also a hunter, shooter and handloader. I am a member of the Vancouver Rifle and Pistol Club (VRPC).

Scanning through your draft, I see a couple of major inaccuracies. I am sure there are others I have missed.

1. Your estimate of lead ammunition released into the environment does not take into account the enormous volume of such ammunition expended at indoor ranges such as that operated by the VRPC. Almost all of that ammunition is collected and recycled-not released into the environment.
2. Although I readily agree with you that copper bullets are an acceptable if not superior alternative for lead in big game rifle bullets, many handguns are not so amenable to a change from lead. Revolvers in particular are dependent upon the ability of lead to "upset" as it is fired from the chamber into the barrel. The much lower pressures developed by such handgun ammunition precludes the use of the much less ductile copper alloys. Additionally, harder alloy or even jacketed bullets can damage the backstops used at many ranges.

I applaud the fact that you favor a voluntary, educational approach such as was demonstrated to be effective in Arizona. I am sure that such an approach will also be effective with the hunters and shooters of Washington State.

Sincerely,

Greg Fiorentino
1204 NW 119th. St.
Vancouver, WA 98685

From: wa-ecology@jamfish.e4ward.com
Sent: Thursday, September 18, 2008 4:52:11 PM
To: Davies, Holly (ECY)
Subject: Re: Lead Chemical Action Plan

Holly Davies,

I do hope you understand that this plan/advisement[Lead Chemical Action Plan] is not playing well with the very large community of Washington State citizens who own, enjoy, and value their firearms. In fact, like so many highly-minded/worded reports that have preceded it in the past 20 years, it is coming off like an end-run around our 2nd Amendment rights.

I am also very disappointed that by the time I received notification about this, the time for public input in Western Washington had passed (Sept 16th). This was compounded by the fact I work in downtown Seattle and it would have been very easy for me to attend this week.

Can you please let me know if minutes, audio or video are available from that public meeting. Thank you.

Sincerely,
Eric Fisher
Bothell, WA

From: M1ADLF@aol.com
Sent: Tuesday, October 07, 2008 2:42:32 AM
To: Davies, Holly (ECY)
Subject: Lead ammunition

I strongly disagree with the phase out and eventual ban of Lead Ammunition. Out of all the pollutants that are put on the Ground such as lawn chemicals, oils and fuels from autos and trucks the amount of lead from shooting and fishing must be minimal. This seems to be another way to stop sportsman in the state of WA. Most outdoor people are the best preservers of nature and the land and waters we use for sport and recreation.

Respectfully
David Fleming
124 Newt Estates Rd.
Longview, WA. 98632
M1ADLF@aol.com

New **MapQuest Local** shows what's happening at your destination. Dining, Movies, Events, News & more. [Try it out!](#)

From: Chad F

Sent: Thursday, September 18, 2008 6:25:12 AM

To: Davies, Holly (ECY)

Subject: Strongly opposed to restrictions on lead ammunition

Restrict the USE of lead shot (not solid projectiles) for bird hunting or other use in wetlands all you wish, but do not in any way limit the people's access to lead ammunition. The so called alternatives are in some cases quadruple the price of the typical lead ammunition. Do people of moderate means not have the same rights as the monied few? Lead projectiles too large to be readily ingested by waterfowl quickly develop a coat of oxidization that limits leaching of lead into the ground, thereby limiting it's effect. Much ammunition already starts with a jacket of copper or brass covering much of the projectile, further limiting its effect. I have examined projectiles that were left on civil war battlefields that still weighed almost the same as when they were left there. Obviously, not much lead "came off" those bullets to make its way through our environment. Furthermore, simple protections limit dangers from hobbyists using lead (don't eat or drink or touch your face when handling lead, wash hands when done, and don't allow children in the area). The biggest danger I see where we could make significant improvements is airborne lead released by industries. That should be your focus. We used lead shot for bird hunting for hundreds of years, so it will be a long time before we stop seeing birds affected by the lead shot remaining in the environment, but we have already taken great strides in that area by requiring non-toxic shot for waterfowl. Thank you for your consideration.

Sincerely,
Chad Force

Stay up to date on your PC, the Web, and your mobile phone with Windows Live. [See Now](#)

From: Mary Ann Ford
Sent: Thursday, October 02, 2008 10:32:51 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Mary Ann Ford
24071 Oneida
Oak Park, MI 48237

From: Ted Foshaug
Sent: Monday, October 06, 2008 1:24:06 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Ted Foshaug
6337 glenwood dr sw
olympia, WA 98512

(360) 357-6898

From: Fred Foster
Sent: Wednesday, October 01, 2008 3:47:14 PM
To: Davies, Holly (ECY)
Subject: Ban lead bullets? Bad idea...

First, the total amount of lead used for ammunition is a fraction of a percent of the total lead introduced into the environment. Quit focusing on something as miniscule as lead projectiles. There are existing regulations for the use of lead shot for hunting and do not require duplication. The example of the shooting range near Olympia is misleading, as I have personally been to this quarry and there is naturally occurring elevated level of lead in the rock. That lead has been there for a long time and isn't going anywhere it will be dangerous.

Second, how will the enforcement of this prohibition be funded? In case you didn't notice, the state is in a financial crisis at the moment and there is no extra money for enforcement nor prosecution. Any fine that would be levied would not come close to balancing the cost of this regulation. In the current fiscal environment expenditures will be closely scrutinized and any program that doesn't return more in fines that it costs to maintain will be a prime candidate for elimination in the next budget session.

Third, this is nothing more than a back door attempt of gun control. Gun control is a hot button in politics, and that percent of the population that uses lead ammunition can be extremely vocal in its opposition to this proposed regulation. Any patron the DOE may have in the legislature will wither under the pressure these voting blocks will bring to bear and without that patronage whoever proposed this plan will likely not have a viable career at the DOE much longer.

This CAP is a lot of expensive effort for very little return. Quit wasting your time, my tax dollars and the DOE's resources on a non-issue for a dubious political gain.

Regards,

Fred Foster
Vancouver, WA

From: Wedell
Sent: Sunday, September 21, 2008 3:14:02 PM
To: Davies, Holly (ECY)
Subject: Lead CAP

Ms. Davies:

I would like to comment on the Lead Chemical Action Plan in regards to banning lead bullets.

With all due respect, lead has been used for hundreds of years for bullets because it is the best metal for the purpose intended and there has been no adverse reactions to hunters harvesting and consuming game animals using lead bullets. Surely the amount of lead put into the environment by hunters and shooters is insignificant in the whole scheme of things and in my opinion should not be considered for banning in the CAP. Thank You

Roger M. Foszcz
910 W. 11th St.
Port Angeles , WA 98363
360-457-8330

From: pat fowler

Sent: Thursday, September 18, 2008 12:18:52 PM

To: Davies, Holly (ECY)

Subject: Lead Ammunition

This is an attempt to ban lead ammunition as a gun control tool, plain and simple. There is not one documented case of lead poisoning in humans from consuming game harvested with lead bullets. Bureacracy at it's finest.

From: Shannon Fowler
Sent: Friday, October 03, 2008 1:20:20 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Shannon Fowler
14020 80th Ave Ct East
Puyallup, WA 98373

From: fowlers@theofficenet.com
Sent: Thursday, September 25, 2008 11:24:36 PM
To: Davies, Holly (ECY)
CC: fowlers45@hotmail.com
Subject: Lead and the Shooting Sports

To Whom it May Concern:

I have read much of the Lead Chemical Action Plan regarding outdoor sports such as hunting, fishing and shooting in general. While certainly lead can be dangerous it should be remembered that no activity in life is without some risk. Children walking to school, driving to the grocery store, eating the foods one enjoys all have an element of risk. That being noted, I want it known that I feel the whole point of this plan is to indirectly legislate away yet another of our fundamental rights to the pursuit of happiness as described in the Constitution of the United States. I am not a conspiracy fan, but there are simply too many do-gooders out there who feel they can eliminate everyone's problems according to their own standards as opposed to letting people make informed decisions.

As far as hunting, fishing and the shooting sports are concerned lead in ammunition is not a problem. Most people who engage in these wholesome outdoor activities will die from other causes as they run out the course of their natural lives long before they ingest enough lead to affect them. Let's be practical and realistic here. If there are any specific human or animal populations that are in danger from lead, and I mean real danger that would result in significant life threatening illness, then let's mitigate for that. A shotgun approach(no pun intended)is hardly warranted and will only cause the usual unintended consequences that always ensue when poorly crafted legislation is imposed on citizens.

I object to any attempt to curtail the use of lead in sporting activities as a result of this plan.

Thank you for the opportunity to comment.

Steve Fowler, Colville, Wa.

From: cat fox
Sent: Thursday, October 02, 2008 7:09:37 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

cat fox
642 nw 79th
seattle, WA 98117

(206) 297-6706

From: Chuck Fox
Sent: Sunday, September 28, 2008 4:27:09 AM
To: 'CHRIS KASTELLA'; Davies, Holly (ECY)
CC: 'Bob Kadow'; ramload@Hotmail.com
Subject: RE: Chemical Action Plan-Lead ammunition

Hi Tony,

The State has sent out information that the ban on lead shot and or bullets was supposed to have been deleted from the "Draft" plan. And that it has now been removed.

Therefore, supposedly, it is no longer an issue.

However, I believe that the response that the Governor and the Department of Ecology has received has been so overwhelming that even if it is true that it was "supposed" to have been removed from the original draft plan, that this response serves to put the State on record that the hunters and shooters of the State of Washington will respond to anything that threatens rights as guaranteed by the 2nd Amendment in its original form and intent.

The state of Washington is one of a handful of States that are considering having ammunition manufactures serialize each bullet so that each bullet can be traced back to its purchaser. I think the response to a ban on lead 'projectiles', as I said above, will go a long way in alerting the government that they have a fight on their hands should they propose and or enact laws that are smoke screens for eliminating our rights as guaranteed by the Constitution and the Bill of Rights.

By the way, the plan does eliminate such things as lead wheel weights and lead in many things that you and I as bullet casters depend on for our hobby.

chuck

From: CHRIS KASTELLA [mailto:kastella@msn.com]
Sent: Saturday, September 27, 2008 11:32 AM
To: hdav461@ecy.wa.gov
Cc: chuck fox; Bob Kadow; ramload@Hotmail.com
Subject: Chemical Action Plan-Lead ammunition

Hello, I was not able to access the plan even though I have the tools. My questions stem from the press release web page.

It is very hard to ascertain any information as there seems to be confusion on the language used to describe the lead in the form it is used in firearms. Lead shot is for shotguns and waterfowl and upland game bird shooting on private lands. Lead bullets are used for recreational shooting at shooting ranges. Copper jacketed bullets are used for hunting in most cases big game or small game. The interchange of these terms in the report make it unclear what is being referred to.

It seems education would be preferable to outright ban.

Is there some form of plan to reduce lead for hunting?

Is there a plan to mandate clean up of certified gun ranges?

How will the state of Washington enforce bans on county or state or national forest lands?
Will there be a fund to help with the pollution clean up similar to the federal "Super Fund" clean up money?

I am not against banning lead shot for hunting waterfowl or upland game birds alternatives are there. Banning lead from bullets used in hunting are no more dangerous then drinking alcohol as the number of shots fired in eh entire state can be measured as a health risk to humans or animals as there is no data on this.

Clean up at gun ranges might be a situation that needs to be looked at but then no data is presented to support this on a wide scale in the state of Washington. Several ranges have started this kind of clean up already!

There needs to be a more comprehensive study on the types of ammunition other than lead shot to determine the affects it has on the human and animal population. This should include the many gunranges in the state of Washington and the people exposed to this type of lead contamination before any blanket rules can be placed on lead bullets, bonded bullets, jacketed bullets versus lead shot!

From: Larry Fox
Sent: Thursday, October 02, 2008 9:03:29 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Larry L Fox
5934 Sundown Lane
Freeland, WA 98249

(360) 331-1950

From: Leslie Francis
Sent: Saturday, October 04, 2008 9:01:14 AM
To: Davies, Holly (ECY)
Subject: Lead in the environment

There is no adequate substitute for lead ammunition and that any effects on humans and wildlife by banning lead ammunition would be very minimal and do not justify a ban as recommended by your department of ecology.

Les Francis
31 Brazil rd.
Sequim, Wa 98382

From: DJ Frank

Sent: Friday, September 19, 2008 5:31:54 AM

To: Vermillion, Kathy (ECY)

CC: info@beegc.org; info@tacomasssportsmensclub.com; inwc@wildlifecouncil.org; admin@kittitasfieldandstream.org; richreathafor@attbi.com; mr_walter2@yahoo.com; kcarpenter@bcmlaw.com; tom.quailcreek@gmail.com; mattm@redhawkusa.com; information@skagitssta.com; office@washingtonarmscollectors.org; Ujhammer@aol.com; leeguns@hotmail.com; woodymathews@hotmail.com; rgrwjb@hotmail.com; jim@universalcorporate.com; spindleblaster@msn.com; boyd@seanet.com; protect2ndamd@comcast.net; rickbrooker@msn.com; handgnr@centurytel.net; parabellum9@aol.com; rje@wildblue.net; ron@uplandbirdranch.com; staff@dryhollow.com; info@gryphonranch.com; chris_wd@msn.com; glsheets@gmail.com; ron.bruno@verizon.net; bob@boldman.com; quack1407@msn.com; guitars@tgi.net; dlhargin@msn.com; RanJenJohnson@aol.com; carl@wcwinc.org; r.ripley@wcwinc.org; BSEditor@aol.com; info@vashonsportsmensclub.com; president@wsrpa.org; 44spl@charter.net; membership@rfgc.org; Davies, Holly (ECY)
Subject: Re: draft Lead Chemical Action Plan

I am very disappointed with this Holly. The only attachment you included here is NOT the CAP but rather only a "soothing" cover letter for an roughly 300 page document. You should have included a link to the complete document at the very least, rather than the general overview on the DoE's website. (Included here for those on this distribution list who haven't found it or had the time to look yet.)

<http://www.ecy.wa.gov/pubs/0807009.pdf>

We will review the entire document asap and comment.

I also note that there is no representation from the shooting and hunting community on the advisory panel. Be advised that this can--and no doubt will--raise some red flags with those of us who enjoy these pastimes.

Regards,
Dan Frank
Director
Washington Arms Collectors
Editor
GunNews Magazine

Vermillion, Kathy (ECY) wrote:

Attached is a copy of the draft Chemical Action Plan (CAP). Please send any comments to Holly Davies at hdav461@ecy.wa.gov , or call Holly at 360 407-7398.

From: Louise Franklin
Sent: Thursday, October 02, 2008 10:39:24 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan. It is my belief that there is no acceptable level of lead exposure. Lead in our environment is of particular danger to young children, entering their systems and affecting their development.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Louise Franklin
360 McGraw St.
Seattle, WA 98109

(206) 352-5332

From: Tim Franks

Sent: Tuesday, September 30, 2008 6:48:54 AM

To: Davies, Holly (ECY)

Subject: Lead Chemical Action Plan

I view this as yet another way the government is making decisions based on emotion rather than on economics, facts, and common sense. The only areas where I see a high quantity of lead are in designated shooting areas. I have never found a piece of lead while I was hunting, I have never known an animal to be sick from lead poisoning due to rifle bullets, and I have never known a hunter to be sick from lead. I don't know what the big deal is. I have hunted all my life and I have never experienced a problem of any kind due to lead rifle bullets. Please do not outlaw lead bullets, the alternative brass bullet costs three to four times as much.

Thank you

Tim Franks

From: Amy Fraser
Sent: Friday, October 03, 2008 2:09:26 PM
To: Davies, Holly (ECY)
Subject: Lead: A Potent Neurotoxicant, Especially for Children

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Amy Fraser
1902 Westview Dr.
Port Angeles, WA 98363

3604575144

From: Steve Friend
Sent: Tuesday, September 30, 2008 4:40:00 AM
To: Davies, Holly (ECY)
Subject: Lead Ammunition

I would like to state my opposition to the Lead Chemical Action Plan in as far as it could lead to an outright ban on lead ammunition. . As stated in the memo, lead shot has been banned from use for all waterfowl hunting for several years now and in my opinion, that was a good decision as it was proven that lead was harming waterfowl when ingested. I think banning all other lead ammunition is overkill as I don't see how lead bird shot/bullets is going to harm other species or human except when intentionally ingested. Unless someone or something is eating gravel from a gun range, I don't see how it could possibly be harming wildlife. The amounts of lead in the environment (except at gun ranges) is so small that the risk is minute. One other point is that lead bird shot is affordable compared with the alternatives along with being more effective in the harvesting of legal game. Last I heard is that Washington State does not have any condors and our eagle and hawk populations are growing every year.

From: Rona Frimmer
Sent: Sunday, October 05, 2008 6:16:32 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Rona Frimmer
527 N 70th St
Seattle, WA 98103

2069205102

From: Gordon S Froese
Sent: Friday, September 26, 2008 1:15:26 AM
To: Davies, Holly (ECY)
Subject: CAP on lead

First why is the NRA not on the list of stake holders? Secondly, there are not cost effective alternatives to lead shot, where with many of the other offending sources this is not the case. There are reasonably cost effective alternatives. It is a stretch to translate the exposure of lead from ammunition to child exposure, which has been pointed out that they are the ones at greatest risk. We in dentistry have been very active in the control of lead in our profession and I agree that the exposure to any toxins should be reduced. But we live in a world where risks of many natures abound. Let us focus on the significant ones and ones where we can provide a reasonable alternative that is not cost prohibitive.
Thank you for your consideration,

Gordon S. Froese, DDS
gfroese@nwi.net

From: Scott Fromme
Sent: Friday, September 26, 2008 12:04:12 PM
To: Davies, Holly (ECY)
CC: pease@oakharbor.net
Subject: lead ammunition ban

We are emailing you to voice our opposition to the proposed ban on lead ammunition. We do not see any benefits to the environment from the proposed ban.

Thanks,

Scott and Laura Fromme

From: SEAN FRY

Sent: Friday, September 26, 2008 6:13:06 AM

To: Davies, Holly (ECY)

Subject: lead chemical action plan

I am against banning lead ammunition and fishing tackle in regards to the latest wacky legislation our state has come up with concerning lead.

The State of Washington doesn't need to govern my fishing and hunting.

Sean Fry
6119 NW Garfield Ave
Vancouver Wa, 98663
360-883-3861

From: John Fulkerson
Sent: Saturday, September 27, 2008 1:46:37 PM
To: Davies, Holly (ECY)
Subject: CAP and lead ammunition

Hello Holly,

I am against any further codification of strictures against lead ammunition. The current Chemical Action Plan does not outright ban lead ammunition; however, such wording as "phase out" has little meaning in such a document, except as to suggest an actionable item. I think we would all like to see workable, affordable replacements for lead ammunition, but I am against the active banning of lead ammunition until such a time as a feasible alternative arrives. Sites such as the Sierra Club use words such as "Safe, reliable, and well-performing non-lead bullets" but rightfully omit the adjective "affordable." Besides this, any such stricture should have a preponderance of evidence showing the imminent need for such a ban. The facts presented in the CAP are not conclusive nor particularly cogent in that regard. Let there be open discussion of all sides on any issue of substance, and we can be sure that there will be no dearth of voices; better to keep government regulatory reach away from it if at all possible. The core of law-abiding gun owners are proven to be respectful (based on hunter organizations and such) of the environment for the good of their own pastime, if not their love of wildlife and the outdoors. It is only natural that they would ones most amenable to a better alternative, once a truly feasible one is available.

Sincerely,

John Fulkerson

Get more out of the Web. Learn 10 hidden secrets of Windows Live. [Learn Now](#)

From: Heather Fulmer
Sent: Friday, October 03, 2008 10:40:34 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Heather Fulmer
22004 99th Pl W
Edmonds, WA 98020

From: RayLam@BoisePaper.com [mailto:RayLam@BoisePaper.com]

Sent: Thursday, September 11, 2008 12:21 PM

To: Davies, Holly (ECY)

Subject: Comments on Lead cap

Much of the lead emissions in the pulp and paper industry comes from wood that is processed in the facility. This lead naturally occurs in the soil, and is taken up into the tree, as well as other minerals. The table is misleading because forest fires, and burning of straw stubble and wheat stubble would cause similar releases quantities (or likely even higher) if the TRI reports were required from these activities.

I am also concerned with phasing out the mixing zones? How does this result in less lead being emitted. The mixing zones are an important component of NPDES permits. Mixing zones are required to protect the beneficial uses of water such as drinking water, fish habitat, recreation, and irrigation.

From: David Fyffe
Sent: Wednesday, October 01, 2008 11:26:23 AM
To: Davies, Holly (ECY)
Subject: Ban on lead bullets

I am **against** a ban on lead used in bullets.
This appears to be an end run to restrict or ban the availability of bullets---AS IN GUN CONTROL.
The state of Washington already has a too restrictive control on firearms and related equipment.
A new law controlling lead used in bullets is nonsense.

Thank you

David Fyffe
P.O. Box 14295
Spokane, Wa. 99214
509 290 2884

From: Aileen "Gagney"
Sent: Thursday, October 02, 2008 7:45:22 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Aileen "Gagney"
2625 Third Ave.
Seattle, WA 98121

From: michelle gaither
Sent: Thursday, October 02, 2008 8:55:06 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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Sincerely,

michelle gaither
7226 ledroit ct sw
seattle, WA 98136

(206) 935-4588

From: Chad Gallauher
Sent: Tuesday, September 30, 2008 9:50:17 AM
To: Davies, Holly (ECY)
Subject: lead

Stop this nonsense. This draft lead CAP is just another way to waste money on studies and laws we don't need. Quit trying to justify your jobs by coming up with outrageous claims that require investigation, reports and more beaurocratic rhetoric (i.e. money). ENOUGH ALREADY!!!!

C. Gallauher

From: olaya garcia
Sent: Thursday, October 02, 2008 9:34:01 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

olaya garcia
agatga
gahja, ot 33510

Laurie Davies
Solid Waste and Financial Assistance Program Manager
State of Washington
Department of Ecology 98504-7600

Dear Laurie,

I am commenting on the lead chemical action plan. Enclosed you will find correspondence I wrote when I served as Tom Fitzsimmons Natural Resource Damage Assessment Trustee lead while I was at the Department of Ecology. I still stand behind those comments.

The current issues are also of concern to me and other shooters like myself. If you are a black powder shooter or target shooter or a number of other kinds of shooter other than a hunter, lead substitutes are a big issue. Many of us reload and cast bullets for very specific shooting purposes. The cost of ammunition has almost doubled in the past 5 years. If you are deer hunting once a year and use a box or two of lead substitute bullets this isn't a problem but for shooters like myself, and there are a lot of them, who shoot thousands of bullets a year at targets, it is a problem.

You mentioned Arizona as a State which has a voluntary program in place for hunting. What you didn't say is that California has banned lead or lead containing bullets totally.

The real reason in California is not environmental it is to ban firearms or at a minimum drastically reduce their use. So it is not unreasonable to believe that this could occur here as well. The presence of lead in the environment is not the real issue. Sampling a gravel quarry in Olympia is like sampling the impact area of a rifle range. Of course you are going to have high lead levels especially if what you are picking up is a spent bullet fragment. What is the endpoint of the lead. It can't be just that it is there. It has to affect someone or organism. There has to be a toxicity pathway. How is lead in the gravel at Capitol Forrest a danger to humans or animals. It can't be that by just being there maybe something bad will happen.

There has to be a triage when examining the effects lead causes the environment. Is lead ammunition the major source of contamination and does it cause the most harm? To totally ban it would seem to say yes. This is not the case. It is simply easy to address this issue because we know where the ranges are and who sells bullets. It is much more an effort to prove lead bullets supposedly cause this incredible harm to the environment.

I applaud voluntary efforts but being an ex Ecology employee I know all too well how "guidelines" become the law of the land without going through the rule making process of WACs and RCWs. Thank you for the opportunity to comment and please put me on any mailing list you have or use kjslick@comcast.net to inform me of emerging developments.

Sincerely Fred Gardner 3102 N 28th Tacoma, Wa 98407-6356

From: Sam Garst
Sent: Friday, October 03, 2008 7:42:40 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Sam Garst
6015 Marantha Lane SW
Suite 540
Olympia, WA 98512

From: Blaine Garver
Sent: Friday, September 19, 2008 1:11:23 AM
To: Davies, Holly (ECY)
Subject: Lead Ammo Ban

Ammunition should be exempt from any lead control. There is no suitable or affordable substitute for lead when dealing with sport shooters (targets, hobbyists, etc). Twenty Two Caliber Rimfire would become unavailable or so expensive that target or sport shooting would be eliminated to all but the rich. I would not tolerate this infringement of my Second Amendment Rights. In truth, this ammo ban is not about the lead, but a backdoor approach to gun control. Hunting and shooting is a huge part of what makes up an Outdoorsman's life. Please do not saddle us with this unnecessary block to enjoying our sport. Whatever small affect lead has on the shooter or outdoors doesn't come close to justifying this ridiculous ban. Remember, lead occurs naturally in Mother Nature. As far as consuming the meat of an animal shot with lead, the area of the wound is ALWAYS cut away and only an idiot would eat the bullet☺.

In case it's necessary to say so, these are solely my views and not the opinions of my employer.

Thank you for your consideration.

Blaine C Garver
Cross Connection Specialist
Water Distribution Specialist
blaine@rainierviewwater.com
253-537-6634 Ext. 1239

From: WILLIAMKEN@aol.com
Sent: Monday, September 22, 2008 10:35:24 AM
To: Davies, Holly (ECY)
Subject: Proposed Lead Ammunition Ban In Washington State

To whom it may concern:

I am not a hunter, but I do a lot of shooting at targets and like to plink out in the field occasionally. The proposed lead ban would very seriously affect my ability to do either. I know of no substitute for lead in pistol bullets and most rifle bullets either. I also do not believe that the use of lead bullets has a serious effect on the environment or wildlife in this state. Yes, lead shot has been banned for a long time in the hunting of ducks and other Pacific flyway birds. The reason is that these birds are bottom feeders and would ingest the shot with what ever they were feeding on. Target practice does not present a similar scenario and neither would the occasional bullet fired at a hunted animal or just plinking for fun. Outlawing lead bullets would put the .22 caliber rifle out of commission as they are the only bullets available. Any effort to force the use of copper, tungsten, steel or bismuth bullets would make shooting prohibitively expensive for most hunters, not only because of the cost of the bullets, but because of their highly destructive effect of rifle and pistol barrels, particularly the hard metals like tungsten and steel. Bullet characteristics would also be adversely affected.

Again, I am totally opposed to the proposed ban and I would urge that the ban not be invoked.
Respectfully submitted,
William K. Gaylord
2116 Pine Tree Drive SE
Port Orchard, WA 98366-3457
360-769-8494

Looking for simple solutions to your real-life financial challenges? [Check out WalletPop for the latest news and information, tips and calculators.](#)

From: Jerry Genschorck
Sent: Tuesday, September 30, 2008 3:18:42 AM
To: Davies, Holly (ECY)
Subject: Ban on Lead

Let's get real, It's Gun Control your trying to accomplish, not solve environmental issues. I am a Hunter and really understand lead in the environment and what you describe as lead ban for the conservation of the environment is really your liberal personal agenda on gun control.

Read the Constitution of the United States. Specifically the Second Amendment!

Christine is on her way out. And any one who supports cheap irresponsible legislation like this needs to go too.

.

From: Herb Gerhardt
Sent: Friday, September 26, 2008 1:16:02 AM
To: Davies, Holly (ECY)
CC: Commission, Fish & Wildlife (DFW); Herb wave Gerhardt
Subject: Lead Chemical Action Plan Comments

RE: <http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/>

Holly,

I support reducing the amount of lead generated by our society, however, we must look at this problem in a realistic fashion.

The amount of lead generated into our environment from lead bullets/shot is negligible. Lead bird-shot has already been banned in many of the bird hunting areas and is regulated by the rules of the WDFW. I think their regulations of lead are just and reasonable.

Any attempt to ban the use of lead bullets though is another matter. If lead bullets are banned in Washington State, that would greatly affect our hunting activities. Yes, I am a hunter and hunt with a muzzleloader which by WDFW regulations must useunjacketed lead slugs! The amount of lead bullets/slugs put into the environment is negligible compared to the amount of lead released by gas powered vehicles and the many old batteries just dumped into our woods and landfills.

Reading your report on this topic, states that animals being hunted with lead bullets cause the spread of lead contamination. That is a ludicrous statement. People who shoot animals and then eat the meat, do not eat the lead slugs/bullets. Those are removed during the meat processing cycle. The lead does not migrate into the animals meat tissues eaten by humans, since the animal is killed in short order and then butchered and processed within a week or so. The lead bullet does not have time to infect any of the meat eaten by humans! The same is true for those animals who are wounded and get away. Most die in a few hours to a few days. Other animals eating that meat, would not suffer from any lead poisoning unless they perhaps eat the remaining lead slug and even if that was the case, that lead slug would be rapidly eliminated in their normal daily body waste elimination.

So for general hunting applications, the use of lead bullets is not detrimental to our ecology! Please focus the states resources toward more pertinent issues.

Thanks for allowing me to comment,

Herb Gerhardt, KB7UVC
90 NE Rainbow Pl N
Belfair, WA 98528

360-275-6876

From: Gerth, Allen S
Sent: Thursday, September 18, 2008 3:55:42 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

There is no adequate substitute for lead ammunition. Despite opinions to the contrary, any affects on humans and wildlife do not justify a ban as recommended by the Department of Ecology. Certainly this is not a real issue of public safety where there are any significant concentrations in a localized area. We are not remotely close to creating another "Super Fund" area that we will also not act on.

Al Gerth
11443 SE 164th Street
Renton, WA 98055-5213
253-657-7838
allen.s.gerth@boeing.com

From: rabbit65@comcast.net
Sent: Saturday, October 04, 2008 12:55:51 AM
To: Davies, Holly (ECY)
Subject: Dept. of Ecology Lead Chemical Action Plan

To: Holly Davies, Department of Ecology

Subject: Lead Chemical Action Plan

According to the Lead Chemical Action Plan (CAP) Ecology is not recommending a ban on non-shot ammunition. However, I am concerned that the CAP could lead to a ban on lead ammunition; therefore, I offer the following comments on the Lead CAP:

Any restrictions of lead ammunition should be phased in to allow those affected to seek alternatives, such as, banning lead in certain types of hunting when an alternative is available. This would not mean banning lead ammunition altogether so citizens could still shoot antique, collectable or valuable firearms that would be harmed by the alternative lead substitute.

Ecology would need to work with stakeholders including those from the shooting sports, which do not appear to be part of the external advisory committee, on solutions and alternatives to lead ammunition.

Banning lead ammunition would put an extreme hardship on sportsman and the sporting industry.

Stores, such as, Cabela's and Sportsmans Warehouse would be impacted by banning lead ammunition and could possibly downsize or relocate, which would affect the state economy.

Thank you for your time and the chance to comment on the Lead CAP.

Sincerely,

Harvey Gertson

From: Sara Giammanco
Sent: Thursday, October 02, 2008 8:52:36 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Sara Giammanco
31740 SW Village Crest Ct
Wilsonville, OR 97070

From: Jerry Gibbs

Sent: Friday, October 03, 2008 3:02:09 AM

To: Davies, Holly (ECY)

Subject: NO

I do not support your opinion on lead used in ammo. I am a long time user of steel ammo and have wounded more ducks and geese than have been saved by the use of steel ammo. This is an attempt to take our gun by banning effective ammunition. This is an end run attack by democrats to take our second amendment rights. Enforce your existing laws, don't just write new ones that people won't support or follow.

Industry has not developed a better bullet than lead. Leave us alone and go after the real polluters.

Jerry Gibbs
Gig Harbor

From: Spc Joseph Gilbert

Sent: Friday, September 26, 2008 12:17:50 AM

To: Davies, Holly (ECY)

Subject:

I BELEIVE THAT YOU ARE UNFAIRLY TARGETING LEAD AMMUNITION IN THE LEAD CAP DRAFT THERE IS PLENTY OF OTHER PRODUCTS AND CORPORATIONS THAT USE LEAD PRODUCTS THAT YOU ARNT SPECIFICLY TARGETING SUCH AS TIRE WEIGHTS AND LEAD SPLIT SHOT FISHING WEIGHTS ETC HAVE YOU EVEN CONSIDERED THE COST TO AMMUNITION COMPANYS WHEN THEY HAVE TO CONVERT TO STEEL WICH RUSTS OR ANOTHER TYPE OF METAL AND THE ENVIRONMENTAL EFFECTS THAT THAT METAL MAY CARRY AS WELL PLEASE FIX YOUR DRAFT ITS STILL EXTREMELY FLAWED I PROMIS YOU THIS MUCH NRA MEMBER TX

From: Kathleen Gill
Sent: Thursday, October 02, 2008 8:58:27 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Kathleen Gill
4338 South Bell Street
Suite 540
Tacoma, WA 98418-7728

From: ggipe@brennaninc.com
Sent: Saturday, September 27, 2008 5:18:29 AM
To: Davies, Holly (ECY)
Subject: Lead ammo

I oppose any volunteer or other ban of lead ammo. Greg Gipe Washington native and Voter.

Sent from my Verizon Wireless BlackBerry

From: david gladstone
Sent: Thursday, October 02, 2008 2:32:02 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

My wife and I are writing to express our support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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Sincerely,

david gladstone
p.O. Box 803
snohomish, WA 98291

(360) 387-1495

From: Dennis Glatting
Sent: Saturday, September 20, 2008 12:36:17 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

I am writing in opposition to eliminating lead from fishing weights and ammunition. Simply, there are no suitable alternatives in both performance and cost and removing lead from those product groups have wide ranging cost impacts, all of which are burdened by the consumer and none by government regulators at a time when consumer budgets are near exhaustion and the financial industry is melting down. Additionally, alternatives to hunting ammunition may cause undue suffering to animals due to unsuitable performance characteristics.

Finally, the proposal seems to justify banning lead from fishing weights and ammunition because "California did it." I wish to point out that California teeters on bankruptcy and there is no empirical data to support California's actions as they only recently banned lead. I see no logical or justifiable reason why the state of Washington should pursue a blind lemming course.

--

Dennis Glatting <dg@pki2.com>

From: Michael J. Glaze
Sent: Monday, September 22, 2008 3:09:08 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Miss Davies,

I am sure that you have heard from shooters and hunters on this subject already. I am very concerned about this as I shoot a Flintlock Muzzleloader. That means I have a barrel that is made from a softer steel than a modern Cartridge rifle barrel. At this moment in time, there is NO workable alternative for lead in my rifle. [Well, that is not totally true, we could melt PURE Gold or PURE Silver and have a metal soft enough for our barrels.] Were I to shoot a steel or copper jacketed bullet of any kind in my rifle, in a very short order, the steel rifling's in the barrel would be scraped from the barrel. I shoot a patched round ball ala D. Boone or D. Crockett. These barrels, while new, are soft steel. Not designed for copper jacket or steel jacket bullets. We simply must continue to shoot lead round balls in our rifles.

While I am concerned about lead in the environment, banning or severely restricting lead bullets is a poor way of doing it. There simply must be other ways of doing it. Look at history, when lead pellets proved to be deadly to animals, steel shot could easily replace it. Hunters did support that, because steel would work. Steel balls rolling down a smooth barrel do not scrape rifling's that are not there out.

Michael J. Glaze
14004 Roslyn Place North
Seattle, WA. 98133
Washington State Muzzleloaders Association. 2008
National Muzzle Loading Rifle Association # 129563
National Rifle Association #155825312

From: Jim Gleckler
Sent: Friday, October 03, 2008 4:08:33 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Jim Gleckler
5149 New Sweden Rd
Bainbridge Island, WA 98110

From: marcy Golde
Sent: Thursday, October 02, 2008 7:23:56 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

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- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

marcy Golde
4407 52nd Ave. NE
Seattle, WA 98105

From: jimsvision

Sent: Monday, September 22, 2008 3:55:13 AM

To: Davies, Holly (ECY)

Subject: WA – Lead Chemical Action Plan as it Relates to Lead Ammunition

Dear Ms. Davies,

My name is Jim Goldsmith, I am currently a resident of Arizona; however, my family and I will be moving to Washington state next year. I received a notice today that the Department of Ecology is in the process of developing a Lead Chemical Action Plan and that part of that plan focuses on lead ammunition. This caught my attention immediately because I have been an avid hunter for most of my life. My freezer usually has an ample supply of game meat such as elk, deer, and antelope which my family and friends feel very fortunate to enjoy. I can honestly say that more than half of our meat consumption is made up of wild game. We truly believe that this meat is far healthier for us than the typical "equivalents (i.e. beef) purchased from the grocery store; wild game is very lean and has not been injected with hormones and other man-made injectables, fed "special" diets, cooped up in pens, and has not been genetically altered by man.

I am very concerned about any regulatory focus on lead ammunition as this can potentially have a very negative effect on the hunting activities of the sporting public and me; these hunting activities contribute significantly to feeding me and my family. I do understand the dangers of lead and am very conscientious about the cleaning and processing of our wild game. In fact, my stepdaughter was drawn for her first junior deer hunt on the north rim of the Grand Canyon last year. It was a successful hunt for her as she did harvest a deer. Some of the information we received prior to her hunt informed us of the concerns regarding the California condor and the sensitivity they have to ingesting lead fragments. The Arizona Game and Fish Department offered free non-lead ammunition to all of the junior hunters, for that hunt, through some of the local sporting goods stores. They did not have the caliber we needed, so she used the typical lean ammunition. In lieu of using the non-lead ammunition, we collected the gut pile and turned it in at the Game and Fish check station; there were opportunities for gift certificates and prizes for the junior hunters who participated in this activity. I viewed the Arizona Game and Fish Department's approach as a far more responsible than the all-out ban that occurred in California. The collection of the deer gut pile was quite a unique idea that worked fairly well with deer that may have been harvested with easy access to a road. However, if the same request was made in the case of an elk gut pile; it could be quite a monumental task and most likely would not be done.

It is quite easy for non-hunters to make fast, uninformed, emotional decisions based on limited and/or unfairly biased information. I believe it is also very unfortunate that anti-hunters and anti-gun proponents may be very quick to jump on the "ban lead ammunition" platform. They can appeal to a non-hunter's or non-gun owner's emotional side by creating a panic by presenting information that makes them believe lead ammunition is significantly introducing dangerous amounts of lead into our environment and creating a public health hazard. A point brought up regarding lead ammunition was the lead level present in a gravel pit, in or near the Capital Forest, used for target practice. If a gravel pit has been used for target practice for the last several decades, of course the lead level is going to be high. It can be as high as 100% lead if all that they pick up are the lead bullets. One of the activities I plan on getting involved in, after I move to Washington, will be establishing public shooting ranges in locations that best serve the sporting public.

If lead ammunition continues to become a big issue, and it looks as if a ban is imminent, then please pursue any such activities conservatively. Many sportsmen, such as myself, have several boxes of lead-ammunition for several calibers of firearms. Ammunition is very expensive. Non-lead ammunition can be as much as 4 to 5 times the price of leaded ammunition. An all-out ban

of lead ammunition would be the same as asking every American driver to empty their gas tanks of leaded fuel when leaded gasoline was no longer permitted.

I am asking that you proceed responsibly with your evaluations and possible regulations regarding lead ammunition.

Sincerely,
Jim Goldsmith
27624 N. 42nd Street
Cave Creek, Arizona 85331

480-502-0456

From: kristin gomez
Sent: Thursday, October 02, 2008 8:14:00 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,
Kristin Gomez

kristin gomez
5020 Laura St. SE
Suite 540
Olympia, WA 98501

From: howard goodman
Sent: Thursday, September 18, 2008 3:17:38 PM
To: Davies, Holly (ECY)
Subject: Anti Lead Ammo Commentary

First of all, let's disabuse ourselves of any thought that Obama, the serial liar and rabid antigunner, would not pack the courts with leftist judicial activists who would declare a "green ammo" mandate, lead ammo ban, to be constitutional.

Next, let's look at a few of the obvious consequences and sequelae of such a law: 1) Only the wealthy could afford to be serious recreational shooters. 2) The frangible copper bullets needed to achieve a humane hunting kill will soon come under legislative attack because of their ability to cause devastating wounds in humans. 3) The firearms industry would respond to the degraded ballistic performance of popular existing calibers in metals other than lead, by producing new lines of expensive large caliber firearms with different rifling twists. A consequence of this would be tens of millions of existing firearms coming onto the secondary market at low prices thus facilitating undesirables' access to guns.

We cannot afford to give Obama and his corps of creeps ship of state !

From: Bob & Janet Gore
Sent: Saturday, September 20, 2008 8:31:25 AM
To: Davies, Holly (ECY)
Subject: draft lead chemical action plan

To whom it may concern.

Please consider the impact to all who own guns in this state of Washington.

There is no reasonable substitute for lead in bullets. I can't imagine that the impact on wild life because there are a few jacketed bullets laying around even comes close to being an important impact . I believe that you are looking to start a fight with all gun owners, those who hunt , those who target shoot, those who compete in shooting sports and those who keep a gun for personal protection from wild animals and criminals.

I think this is an effort to ban guns in Washington State. And before you are done you will create thousands of new criminals in Washington State, those who own and shoot guns or even just keep one for personal protection.

Please abandon this idea and do something good for us who live in this state. The Department of Ecology ought to be friends of the citizens of Washington State, not an arrogant bunch of know it all bullies that you always seem to act like.

Robert M. Gore
Kennewick, Washington

From: joan gould
Sent: Thursday, October 02, 2008 7:09:11 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

joan gould
197 st johns pl
brooklyn, NY 11217

From: Shilah Gould
Sent: Thursday, October 02, 2008 7:21:30 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is even on Christmas lights! Of course children are going to touch the tree and the lights... please help get lead out of our homes!

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Shilah Gould
1508 Fir St
Port Townsend, WA 98368

3603852789

From: Joe Granger
Sent: Thursday, September 18, 2008 4:55:12 AM
To: Davies, Holly (ECY)
Subject: Lead Ammunition Ban

Dear Sirs:

Such a ban would constitute a taking of private property without just compensation and would thus be a violation of our state and federal constitutions.

If you are serious about this ban, please fund a depository of enough just compensation so those who have lead ammunition can make a claim, turn in their ammunition, and be paid for it.

Joseph H. Granger

From: Betsy Grant
Sent: Friday, October 03, 2008 1:25:46 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Betsy Grant
16904 SE 136 street
Renton, WA 98059

From: Karen Grant
Sent: Thursday, October 02, 2008 3:27:27 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Karen Grant
3460 77th ave se
Mercer Island, WA 98040

From: William Graves
Sent: Monday, October 06, 2008 4:31:54 AM
To: Davies, Holly (ECY)
Subject: Draft Lead CAP

The following was emailed to Governor Gregoire:

Governor Gregoire,

The Draft Lead Chemical Action Plan (CAP) is of serious concern to us. There is no adequate substitute for lead ammunition. Any affects on humans and wildlife do not justify a ban as recommended by the Department of Ecology. In other states that have started with voluntary restrictions soon end up with mandatory restrictions.

Department of Ecology's response that CAP does not directly ban ammunition is a game of smoke and mirrors. They are trying to avoid a public outcry with the loose wording that is used in their CAP.

Please have this plan revisited and written with honest intent of what the Department of Ecology is planning to do.

Sincerely,

William & Anita Graves

From: David Griffin
Sent: Thursday, October 02, 2008 8:04:27 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

David Griffin
6202 27th Avenue NE
Seattle, WA 98115

(206) 729-9510

From: The Groshells
Sent: Saturday, September 20, 2008 3:33:21 PM
To: Davies, Holly (ECY)
Subject: banning lead

Holly Davies,

I am writing to discuss my concern for the banning of lead. Although I am not a hunter I do enjoy taking my kids fishing and I also enjoy airgun target shooting sports. As things stand right now there are no good substitutes for lead in the use of fishing weights or in the use of airgun target shooting. Also, I can appreciate how detrimental it would be to hunters as well. Before a substance that has been heavily used in these fields for thousands of years is banned there needs to be a viable and affordable alternative.

I am a huge fan of wildlife and obviously very concerned about the health and safety of people as well. I also have a good understanding of the dangers of lead, thanks to a background in Biology. I have a Biology degree from WWU and graduated in the top 5% of my class in 1996. I also have 2 young kids I would never want to be harmed from lead exposure. That being said I am smart enough to know that lead is only harmful when allowed to enter our bodies. It is hard to inhale through lead dust (due to its relative weight) and the only other means of exposure would be through ingestion under normal circumstances.

Please don't ruin hunting, fishing, and target shooting in our state by banning the use of lead. I'm not sure you will save anyone with a working brain from lead poisoning, but you will ruin family entertainment, personal enjoyment, and numerous sporting goods companies. Your time, efforts, and money would be much better spent on making car manufactures meet higher fuel economy standards or controlling growth into undeveloped areas.

Thank you for taking the time to read this, and please realize the relatively low risk that lead presents in fishing gear and ammunition.

Jeff Groshell

From: Barbara Gross
Sent: Thursday, October 02, 2008 7:06:41 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Barbara Gross
6536 44th Avenue NE
Seattle, WA 98115-7542

(206) 524-4592

From: Peter Gross
Sent: Thursday, September 18, 2008 5:48:22 AM
To: Davies, Holly (ECY)
Subject: lead ammunition

As a hunter I will honestly say I don't have a problem with lead ammunition being banned from certain hunting areas, but I do believe an exception should be allowed for established firing ranges. Practice is essential to being able to use a firearm well, and lead ammunition is cheaper than its substitutes. If lead becomes banned even from ranges, the cost of staying in practice with our firearms will go up considerably. It is our obligation to the animals we hunt to kill as cleanly and humanely as possible. If we can't afford to practice, we won't be able to achieve the accuracy necessary to ensure a humane harvest. I'll happily go afield with premium lead free ammunition, I do anyway, but please let me continue to use the cheap stuff at the range.

Sincerely,
Peter L. Gross
bjorncurlybeard@yahoo.com

From: Ravi Grover
Sent: Friday, October 03, 2008 1:20:20 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan.

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Ravi Grover
POB 802103
Chicago, IL 60680

From: Arthur Grunbaum
Sent: Thursday, October 02, 2008 7:08:21 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, the plan must be strengthened significantly. Specifically, the plan must include the following recommendations:

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Arthur Grunbaum
1128 State Route 105
Aberdeen, WA 98520

(360) 648-2254

From: RON GSCHWEND

Sent: Saturday, September 27, 2008 12:15:21 AM

To: Davies, Holly (ECY)

Subject: lead ammunition

Non-lead ammo will destroy the shotgun target shooting sport for all but the very rich who can afford to shoot \$10-\$20 / box alternatives.

I will result in more wounded animals as the non-lead loses accuracy and power.

So more suffering for the middle class and animals!

Seriously - shooting complexes can contain and collect spent lead and the amount of lead put in the environment by rifles and shotguns during the very limited seasons already in place will be negligible.

Ron W. Gschwend
Biologist and Sportsman

From: Charles Guenther

Sent: Saturday, October 04, 2008 5:04:06 PM

To: Davies, Holly (ECY)

Subject: Lead Chemical Action Plan

Please do not ban lead ammo because us target shooters will have no choices for ammo. Steel ammo destroys metal targets, and is not available in very many calibers, and the steel ammo that is available is very expensive.

Thank you, Charles Guenther

From: Susan Gundy
Sent: Thursday, October 02, 2008 5:12:38 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Susan Gundy
6537 Sunnyside Ave N
Seattle, WA 98103

(206) 548-9541

From: Darrin Gunkel
Sent: Thursday, October 02, 2008 8:05:43 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Darrin Gunkel
500 W Mercer St #101
Seattle , WA 98119

From: Dorothy Guth
Sent: Friday, October 03, 2008 8:49:28 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly to keep our state's population safe. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals. I want to live in a state that is a leader in this area.

Sincerely,

Dorothy Guth
716 2nd Street
Suite 540
Kirkland, WA 98033

425-889-4769

From: anne guthrie
Sent: Friday, October 03, 2008 5:11:31 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

As a researcher in the prevention of disabilities, my father , Dr Robert Guthrie, was an early advocate in "getting the lead out" of the environment and worked hard in our home state, as well as nationally and internationally to inform and educate people about the dangers of lead to our health. For this reason I am well aware of that lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

For the sake of children, workers and all of our friends and loved ones, please work to expand my now deceased father's work to "get the lead out" of our environment.

Sincerely,

anne guthrie

1812 N 190th street
Suite 540
shoreline, WA 98133

From: Barbara Guthrie
Sent: Friday, October 03, 2008 4:47:26 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Barbara Guthrie
18531 Ashworth Ave N.
Shoreline, WA 98133

From: Kmhaakensen@aol.com
Sent: Monday, September 22, 2008 12:22:38 PM
To: Davies, Holly (ECY)
Subject: Lead use @ ranges

I'm a retired police officer and have shot in police competition for over 35 years using lead bullets. This type of ammunition doesn't harm the environment in anyway. The ban of lead in ammunition is just another way for the anti-gun people to disarm law-abiding citizens of their rights. I'm totally against this type of action in any form.... Mike Haakensen

Looking for simple solutions to your real-life financial challenges? [Check out WalletPop for the latest news and information, tips and calculators.](#)

From: Phyllis Haaland
Sent: Friday, October 03, 2008 8:22:55 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Phyllis Haaland
325 Ward St
Seattle, WA 98109

From: David Habib
Sent: Thursday, October 02, 2008 11:39:14 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

David Habib
2623 134th Ave NE
Bellevue, WA 98005

(425) 702-8160

From: Dan Hagan
Sent: Saturday, September 20, 2008 11:41:31 AM
To: Davies, Holly (ECY)
Subject: Lead Ban

Not a good idea. Faulty plan with no solution for an avid sport as there is no economical alternative to the use of lead.
Very short-sighted plan.

Terrible Idea.

Sounds like Washington is going the way of Communist Leadership with plans like these.

Dan Hagan

From: Rod Hagel
Sent: Thursday, September 25, 2008 11:13:20 PM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Attachments: Bee UK.jpg

Holly:

Most of us understand the toxicity of lead, but what is the practical risk/threat from lead bullets, in contrast to what it possibly is? I suspect scavengers pass the lead, before it becomes much of a risk to them, but then do I know? Also in the comments on the threat of lead shot to waterfowl, it is stated that large numbers of waterfowl died after ingesting the lead shot. What is "large numbers"? Silent Spring did this kind of thing to DDT and resulted in millions of lives lost to malaria. Working with the Shooting industry may turn up something that is less toxic and better for the hunter/shooter & game. Maybe Ecology can be part of the solution, if there is a problem.

With the price of metals, mining a shooting pit might be a profitable venture.

Sincerely yours,

Rod Hagel

PS: Hope you have a splendid day.

Get more out of the Web. Learn 10 hidden secrets of Windows Live. [Learn Now](#)

From: Margot Haggard
Sent: Thursday, October 02, 2008 9:41:04 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Margot Haggard
1401 5th Ave W. #203
#203
Seattle, WA 98119

(206) 325-5036

From: Hooker Hailstone

Sent: Thursday, September 25, 2008 10:32:48 PM

To: Davies, Holly (ECY)

Subject: Lead ban

I do not think the lead ban will help hunting in this state! You are looking for fix all, that will not help!

A LEAD BAN WILL NOT HELP!

D. Hooker Hailstone
Carnation Washington

From: Chester Hamilton
Sent: Saturday, September 27, 2008 8:45:21 AM
To: Davies, Holly (ECY)
Subject: Lead ban

I am an avid fisherman and hunter and resident of Washington. I am against the ban on lead for ammunition and for lead weights. This legislation will dramatically impact sportmen, and should not be passed.
Chester Hamilton
Moses Lake, Wa. 98837

From: Jeffrey K Hampshire
Sent: Tuesday, September 30, 2008 12:09:49 PM
To: Davies, Holly (ECY)
Subject: lead CAP comment

Attachments: "AVG certification"

To whom it may concern,

I am writing a short comment concerning this proposed rule change and action dealing with lead, in particular lead used in ammunition.

I am not a resident of your state but as a fellow hunter, shooter and reloader am concerned about the depth of this and the potential restriction on personal activities in your state and the potential impact this could have on other states including my own.

I am an EPA certified and licensed lead based paint risk assessor, we are a group of highly trained individuals dealing with the effects of lead on people and in particular young children, this entails doing lead paint inspections, risk assessments and EBL investigations in the case of a child with plumbism. You may ask what lead based paint has to do with this? As a risk assessor and construction rehabilitation specialist for a rural preservation corporation, I am responsible for addressing ANY potential exposure and hazard presented by lead based paint and any other source of lead that could potentially harm human beings. Casting bullets and the use of cast lead or jacketed lead bullets has little to no impact and or risk to normal human activity, there is far more risk from lead bearing dust in a home than in the wild from bullets.

100's of thousands of tons of lead was placed into the atmosphere through the use of leaded gasoline, there is far more lead along our roadsides, in parking lots and junkyards than could be caused by hunting or shooting with lead bullets. Also, a child is far more likely to be poisoned by dust in their home from window wells, window sills and floors by lead bearing dust than from ANY OTHER source, typically from hand to mouth in small children. There can be levels of lead in exposed soil around the perimeter of a home from deteriorated lead based paint but it is not common and easily mitigated by simply planting grass or other ground covers, placing mulch, etc. Lead bearing dust INSIDE the home is the most insidious and common source for plumbism in children, not in the wild.

Lead is a heavy metal, it does not migrate, it does not contaminate water sources and will not move, it is a naturally occurring element and can be found virtually anywhere, a few bullets here and there will have no impact.

Years ago my state as well as others banned the use of lead shot for hunting migratory birds and the use of lead sinkers, there has been no change in the amount of lead present in fish or migratory birds, the bans only effect was to limit the options of law abiding citizens engaged in lawful activity, it had zero environmental impact.

I would suggest that a comprehensive plan be put forth by your state to address lead based paint in pre-1978 housing if not already in place, EPA and HUD rules apply to federal dollars being used for rehabilitation of homes but has no impact beyond that, THE most proven process to impact lead poisoning is the reduction of lead based paint hazards, not what you are proposing. I implore you to abandon this effort so as not infringe unnecessarily on the rights of law abiding

citizens and to address the real problem of older housing stock loaded with lead based paint hazards.

Respectfully

J K Hampshire

From: Jeffrey K Hampshire
Sent: Wednesday, October 01, 2008 3:19:07 AM
To: Davies, Holly (ECY)
Subject: RE: lead CAP comment

Thank you for your timely response, answering public concerns goes a long way towards open and fair government and is much appreciated.

I have to ask though, why in this letter and literature associated with the CAP is lead continually referred to as a chemical rather than an element?
It gives the impression to people that lead is something that will easily migrate and potentially pollute aquifers, wells, etc. when in fact lead does not migrate and naturally occurs throughout the country in varying quantities. Lead can be hazardous, but is easily controlled due in large part to the fact that it is a heavy metal and does and stays put, an object at rest tends to stay at rest.

The only vegetation that can be contaminated by lead is tubers which very, very few wild animals eat so it is highly unlikely that wildlife would be contaminated in the natural course of browsing for food, perhaps feral pigs may be at a moderate risk but certainly not any greater than from naturally occurring galena. Some birds have been effected by ingesting small lead particles but that is rare, lead pellets settle to the bottom of waterways and is not any area where they would seek gravel for processing food in their crops.

All people and wildlife carry a background amount of lead in their long bones, this is inescapable just as we carry many other elements and minerals in our body's, low levels of lead are not an issue, only when they exceed the action level do they become a concern which is most worrisome in children under 6 who's central nervous systems are still developing, adults can be poisoned but are not at danger for lifelong neurological deficits as children are. I do believe that we must take appropriate action concerning hazardous materials, but there are levels where this concern leaves the realm of common sense and becomes an answer looking for a problem to solve and tends to infringe on the rights of individuals and society as a whole. There are far more insidious chemicals being used in the making of building materials, carpet, furniture, plastics, etc. that cause far more harm to children and adults alike from out gassing of toxic fumes, in my opinion these issues are far more important than lead, I have worked in building construction for 30+ years and as a construction specialist for 20+, mitigating lead hazards has had little to no impact in out area with millions of dollars spent, our county health department averages ONE EBL investigation per year, hardly an epidemic of lead poisoned children.

At any rate, it would be much more accurate to describe lead as a naturally occurring element than as a chemical.

Again, thank you for your response and attention to public concerns.

Regards

J K Hampshire

On Tue, Sep 30, 2008 at 12:25 PM, Davies, Holly (ECY) wrote:

Thank you for sending in your comments on the Draft Lead CAP. Ecology is not proposing a ban on lead ammunition in the Draft Lead CAP. We would like to work with hunters and shooters to promote non-toxic alternatives to lead and reduce releases without negatively affecting hunting or shooting areas.

I am happy to hear that your support our priority, which is reducing childrens exposure to lead-based paint. To address this we are recommending several actions, such as accepting delegation of the new EPA rule on renovations in pre-1978 houses and child care centers, testing more children to find more of the children with elevated blood lead levels, requiring landlords to remediate lead paint when it is found to be the source of lead for a child with an elevated blood lead level, and assessing pre-1960 rental homes for lead hazards. One of our state agencies, CTED, has a grant to remediate lead hazards in low income homes and Ecology is supporting them in seeking renewal of this grant. Several agencies are also doing more outreach to tell people that lead based paint is still the largest source of lead to children and what programs are available to help. Many people in Washington think we donft have any lead paint and it is just an East Coast issue. They are surprised to learn almost 60% of our homes were built before 1978.

We are required to consider all the options and include all the options in the CAP (WAC Chapter 173-333). We have to include a no-action option, an option that results in the phase out of uses and releases, an option to manage the chemical to reduce exposures, and other options such as available substitutes. After considering all the options, we decided to recommend working with stakeholders on voluntary steps.

There is an important correction in Ecologyfs draft Lead Chemical Action Plan (CAP). On page 233, Recommendation 9, stated gIn areas where WDFW has required non-toxic shot, other non-regulated activities such as target shooting and shooting ranges should be prohibited from using lead shot.h This language has been deleted. This language was inadvertently left in the draft CAP from a previous draft and is not our recommendation. As we have stated, Ecology does not recommend a ban or regulation of lead in any type of ammunition beyond current law. Our recommendation is to work with WDFW,

hunters and shooters in development of voluntary approaches to reducing harm caused by the use of lead shot. The inclusion of the language above is an oversight, and has been removed from the draft CAP, which is currently out for public comment.

Please take a look at the focus sheet we prepared about lead ammunition and the Draft Lead CAP. I've attached the fact sheet to this email or you can access it at:

<http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/>

Sincerely,

Holly Davies, PhD
Chemical Action Plan Developer
SWFAP/ Industrial
WA Department of Ecology
PO Box 47600
Olympia, WA 98504-7600
Phone: 360.407.7398
Fax: 360.407.6102

From: Jeffrey K Hampshire [mailto:jkhamshire@verizon.net]
Sent: Monday, September 29, 2008 8:10 PM
To: Davies, Holly (ECY)
Subject: lead CAP comment

To whom it may concern,

I am writing a short comment concerning this proposed rule change and action dealing with lead, in particular lead used in ammunition.

I am not a resident of your state but as a fellow hunter, shooter and reloader am concerned about the depth of this and the potential restriction on personal activities in your state and the potential impact this could have on other states including my own.

I am an EPA certified and licensed lead based paint risk assessor, we are a group of highly trained individuals dealing with the effects of lead on people and in particular young children, this entails doing lead paint inspections, risk assessments and EBL investigations in the case of a child with plumbism. You may ask what lead based paint has to do with this? As a risk assessor and construction rehabilitation specialist

for a rural preservation corporation, I am responsible for addressing ANY potential exposure and hazard presented by lead based paint and any other source of lead that could potentially harm human beings. Casting bullets and the use of cast lead or jacketed lead bullets has little to no impact and or risk to normal human activity, there is far more risk from lead bearing dust in a home than in the wild from bullets.

100's of thousands of tons of lead was placed into the atmosphere through the use of leaded gasoline, there is far more lead along our roadsides, in parking lots and junkyards than could be caused by hunting or shooting with lead bullets. Also, a child is far more likely to be poisoned by dust in their home from window wells, window sills and floors by lead bearing dust than from ANY OTHER source, typically from hand to mouth in small children. There can be levels of lead in exposed soil around the perimeter of a home from deteriorated lead based paint but it is not common and easily mitigated by simply planting grass or other ground covers, placing mulch, etc. Lead bearing dust INSIDE the home is the most insidious and common source for plumbism in children, not in the wild.

Lead is a heavy metal, it does not migrate, it does not contaminate water sources and will not move, it is a naturally occurring element and can be found virtually anywhere, a few bullets here and there will have no impact.

Years ago my state as well as others banned the use of lead shot for hunting migratory birds and the use of lead sinkers, there has been no change in the amount of lead present in fish or migratory birds, the bans only effect was to limit the options of law abiding citizens engaged in lawful activity, it had zero environmental impact.

I would suggest that a comprehensive plan be put forth by your state to address lead based paint in pre-1978 housing if not already in place, EPA and HUD rules apply to federal dollars being used for rehabilitation of homes but has no impact beyond that, THE most proven process to impact lead poisoning is the reduction of lead based paint hazards, not what you are proposing. I implore you to abandon this effort so as not infringe unnecessarily on the rights of law abiding citizens and to address the real problem of older housing stock loaded with lead based paint hazards.

Respectfully

J K Hampshire

From: Dave Handa
Sent: Saturday, September 20, 2008 3:19:05 AM
To: Davies, Holly (ECY)
Subject: lead chemical action plan

To whom it may concern,
I am opposed to further regulation of lead as presently used for recreational and hunting use of metallic cartridge ammunition (excluding shotgun shells typically used for bird hunting). While I do presently use some "lead free" and "low toxicity" ammunition presently, I have found the quality, and reliability of this ammunition to be poor. To ban lead ammunition at this time, with no reliable alternatives would be an extreme hardship to my sport and recreation.

I believe that continuing to educate both consumers and manufacturers on the benefits of "lead free" ammunition is the best way to encourage innovation, and improvements in this technology. Bans are rarely the answer, and often have many unintended consequences.

Respectfully,

Dave Handa
Seattle, WA
206.369.4366

From: MARK HANEY

Sent: Friday, September 26, 2008 10:07:11 AM

To: Davies, Holly (ECY)

Subject:

what are you doing trying to restrict lead bullets. each person hunting would have to fire a million bullets to do any damage to the environment. this is just a ploy to restrict ammunition sales and make it too expensive to shoot. these extreme views are causing a lot of problems with shooters who don't believe the b.s. the politicians are trying to shove down our throats. nobody is going to give up their guns or their ammunition and if laws are to be passed that try, the politicians will be voted out of office.

From: Herb Hardin
Sent: Wednesday, September 24, 2008 3:48:54 AM
To: Davies, Holly (ECY)
Subject: Lead ammunition

This is to speak against banning the use of lead in pistol and/or rifle ammunition.

I am unaware of any peer reviewed study showing that lead ammunition is an extant harm to wildlife, with the possible exception of lead shot in shotgun ammunition for bird hunting - and I support the use of steel shot for that use. Steel does not, however, appear to be a viable substitute for pistol or rifle ammo.

Without a viable substitute, your proposed ban on gun ammunition containing lead is tantamount to banning pistols and rifles of all kinds. What about law enforcement? What will you have the WA State Patrol use in their Glock .40 sidearm, bubble gum? It is so impractical as to engender suspicion that the proposal is a stealth attack on our Second Amendment. Shame on you!
I urge you not to proceed with such effort.

Herb H. Hardin

From: John Harding
Sent: Tuesday, September 23, 2008 9:10:12 AM
To: Davies, Holly (ECY)
Subject: Ban on Lead Ammunition

Holly,

I'm writing in regard to the proposed ban on all lead ammunition in the state of WA. I'm curious as to what hard data you have that proves how many animals die of lead poisoning specifically from lead ammunition each year. Can you provide that information? My bet is that you can't.

Personally, I believe this is just a smokescreen for the anti-gun crowd to get around the 2nd Amendment. If they can't ban guns outright, because the Bill of Rights protects our freedom in that area (as evidenced by the latest Supreme Court decision), then the next best thing is to ban ammunition by making it so expensive that no one can afford it. I believe this proposed ban on lead ammunition is a de facto ban on guns and I will not support it, especially if the rationale for it is "junk" science based on estimates with no hard data.

If you can convince me otherwise, I'm listening

John Harding

20311 61st Ave SE
Snohomish, WA 98296
360-668-8576
360-668-5120 - Fax

From: Leah Eister Hargrave
Sent: Thursday, October 02, 2008 7:56:55 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Leah Eister Hargrave
1010 N Allen Pl
Seattle, WA 98103

2066335798

From: THarrin103@aol.com
Sent: Tuesday, September 23, 2008 6:25:47 AM
To: Davies, Holly (ECY)
Subject: (no subject)

To whom it may concern:

It seems there is no scientific evidence that lead use in ammunition and fishing weights are a problem and there is no acceptable alternative available for ammunition. There is no adequate substitute for lead ammunition and it seems that the effects on humans and wildlife do not justify a ban.

Thank You
Thomas R. Harrington

Looking for simple solutions to your real-life financial challenges? [Check out WalletPop for the latest news and information, tips and calculators.](#)

From: Howard Harrison
Sent: Thursday, October 02, 2008 7:14:33 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Howard Harrison
17719 NE 110th Way
Redmond, WA 98052-7252

425-885-9840

From: george hart
Sent: Sunday, September 28, 2008 1:42:41 PM
To: Davies, Holly (ECY)
Subject: Ban of lead shot

Ms. Davies,

I have been a life long hunter and enjoy target practice as well as shooting clays. I am also a wildlife biologist and I am not convinced that a complete ban on lead is the answer at this time. I strongly suggest Ecology invest or share the cost of research on different types of material that can be used in the place of lead.

Hunters have already enjoyed the expense of shifting to lead shot to hunt waterfowl as most of the older guns couldn't handle the steel vice the lead. I fully understand the justification for this because of the water fowl apparently eating the lead shot.

I have performed numerous necropsies and have yet to discover lead as the killer or much less in the digestive system of the wildlife I have worked on, which included both hunted and the non-hunted wildlife. We are continuously fighting for the second amendment and this gives the impression of another attack and process of taking away another of our privileges.

If Ecology can point me to a material that cost either the same or less than lead and has the same or better shooting qualities as lead I will become a very strong supporter for the switch. Until that happens I will strongly oppose your recommendation number 9 about the ban

Thanks for the opportunity to comment.

George Hart, Biologist

From: Candice hartmann
Sent: Saturday, October 04, 2008 1:52:25 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Candice hartmann
1608 highland court
Mukilteo, WA 98275

unavailable

From: Stephen & Kathy Harvey
Sent: Tuesday, September 23, 2008 2:20:33 AM
To: Davies, Holly (ECY)
Subject: Dept. Of Ecology Ammunition Ban

Dear Ms. Davies,

The plan to ban all lead ammunition in WA State, if passed, will prevent ordinary hardworking tax payers from pursuing the shooting sports. There are no affordable alternatives to lead for ammunition. I suspect that is not a revelation to your agency, and that the greater agenda is ensuring that firearms and the shooting sports are nothing but a footnote in History. This backdoor attempt to subvert our constitution is evidence, that your nonpartisan agency is anything but nonpartisan. The irony for me is that for the first time in 32 years, I will vote for a Democrat for President. I will always vote against any political party or individual who attacks our liberties, our Constitution and my common sense. Does your agency truly believe that bullets fired into berms at gun ranges, or used to hunt game are going to lead to an epidemic of lead poisoning? This science you claim to use as your reason for this proposed travesty, is nothing more than manipulation of the facts and the use of scare tactics aimed at the uneducated in these matters. Why won't you people just tell the truth? If you want to live in a nation that effectively bans firearms, I would suggest Canada!

Who exactly are you accountable to? This plan has the look of a George Soros style of shady political maneuvering, without the checks and balances of political accountability. If I sound agitated, it is because I am sick and tired of non elected bureaucrats subverting the legislative process, and pursuing their personal agendas.

Respectfully Yours,

Stephen Harvey

From: Bob Haskins

Sent: Friday, September 19, 2008 6:53:44 AM

To: Davies, Holly (ECY)

Subject: Lead Amunition

Please leave our guns and ammunition alone. Lead comes from the ground. After we shoot it. It goes back into the ground to be recycled or is in small amounts that can't possibly be a problem. 50 to 200 grains typical. I wish that the government would spend our resources on items that are governments business. I guess the only way to let you guys know how we feel is at the voting polls.

Bob C.Haskins 11014 E Connor Rd.
Valleyford Wa. 99036

From: Jeff Hastings
Sent: Thursday, September 18, 2008 1:03:30 PM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan/Focus on Lead Ammunition

Holly Davies
Dept of Ecology
P.O. Box 47600
Olympia, WA 98504-7600
Fax: (360) 407-6102

Holly Davies I am firmly against the Lead chemical action plan as far as it applies to lead ammunition
There is no adequate substitute for lead ammunition and that any affects on humans and wildlife do not justify a ban as recommended by the Department of Ecology. I hope you will not let a few extremist anti hunting environmentalist throw another unneeded regulation on our hunting and shooting sports.

Thank You

Jeff Hastings

810 s pierce

Spokane Wa.

<http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/>

From: Margie hatter
Sent: Thursday, October 02, 2008 7:07:31 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Margie hatter
4833 Woodland
Western Springs, IL 60558

(708) 246-4039

From: Ken Hecker
Sent: Tuesday, September 30, 2008 5:59:12 AM
To: Davies, Holly (ECY)
Subject: Fw: Forwarded Message from the Custer Sportsmen's Club

We have used lead ammunition for centuries with no documented ill effects. As a sportsman, I oppose any constraints on its continued use, and will do my utmost to assure the election defeat of any politician who supports a ban.

Ken Hecker
Blaine, WA

--- On Mon, 9/29/08, Jeff J. Goertz <larissajeff@comcast.net> wrote:

> From: Jeff J. Goertz <larissajeff@comcast.net>
> Subject: Forwarded Message from the Custer Sportsmen's Club
> To: "Holdaway, George" <georgeholdaway@telus.net>, "Holdaas, Peter" <holdape@comcast.net>, "Hiner, John E." <jehcorp@pogozone.net>, "Higgerson, Scott J." <higgesjl@bp.com>, "Hess, John Arthur" <jphoenixy2k@wmconnect.com>, "Herms, Ron" <ronhermspnw@aol.com>, "Hepler, Karl" <karlh556@yahoo.com>, "Henken, Raymond" <mrhenken@juno.com>, "Helm, Larry" <larnsha@earthlink.net>, "Heller, Jerry" <jwheller70@yahoo.com>, "Hecker, Ken" <kehecker@yahoo.com>, "Haymond, Charles" <charles.haymond@verizon.net>, "Hawn, Jere R." <jr2hawn@comcast.net>, "Hartman, Larry" <larryjhartman@comcast.net>, "Hartford, Robert" <nwhartford@juno.com>, "Hart, John F." <pjth@earthlink.net>, "Harris, Kevin" <iaruncugar@yahoo.com>, "Harmer, Terry" <tharmer@clearwire.net>, "Hargrove, Bob" <bobctg1@aol.com>, "Hanson, Dale E." <hans.ode@comcast.net>, "Hamilton, Gordon" <gordeeham@verizon.net>, "Hall, Michael D." <m3339_99@yahoo.com>, "Haggren, Mike" <mhaggren@comcast.net>, "Haber, Matt" <habermatt@hotmail.com>, "Gwinner, William F." <tgwinner@comcast.net>, "Gudmundson, Patrick" <Boatman@fidalgo.net>, "Groves, Jim" <logroves@clearwire.net>, "Gross, Gregory W." <gwgross@galaxynet.com>, "Griffith, William" <griffwh@bp.com>, "Greenough, Paul" <pagreenough_34021@yahoo.com>, "Green, Robert" <simplegreen@comcast.net>, "Graham, Robert" <grahamrk9@gmail.com>, "Gorham, Kim" <king38@msn.com>, "Gordon Sr., Stephen H." <shggmg@aol.com>, "Gooding, Nathan" <koobuh@gmail.com>, "Gooding, James" <jimsuegood@yahoo.com>, "Gooch, Jason" <goochjayce@aol.com>, "Gold, William P." <bginbham@yahoo.com>, "Goertz, Jeff J." <LarissaJeff@comcast.net>, "Gleim, Gerd" <grdglm36@worldnet.att.net>, "Gillig, Ron" <rong@walkerscl.com>, "Gilchrist, Rick" <rsilchrist28@sprintpcs.com>, "Gidberry, John" <jbgrizz@hotmail.com>, "Gervol, Magnus" <bac_limit_08_percent@hotmail.com>, "Gering, Marty" <gering50@msn.com>, "Galvin, Thomas J." <galvinusmaximus@msn.com>, "Galvin, Michael "Red"" <redgalvin@comcast.net>, "Fullen, Gail" <gailfullen@yahoo.com>, "Freeman, Chris" <chrissfreeman@verizon.net>, "Fraser, William J." <frasfraser@hotmail.com>, "Fox, Joseph M." <jmf_tga@yahoo.com>, "Foster, Craig"

<info@cauliflowerear.com>, "Fortmann, Daniel" <efortmann5@aol.com>, "Forslof, Richard Lee" <forslof@comcast.net>, "Flynn, Greg" <robbieandgreg@hotmail.com>, "Fister, Steven" <fistheb@hotmail.com>

> Date: Monday, September 29, 2008, 1:10 PM

> From: "Jay Summerfelt"

> <jay.summerfelt@gmail.com>

> To: jay.summerfelt@gmail.com

> Subject: Potential Lead Ammunition Ban in WA

> Date: Thu, 18 Sep 2008 04:40:42 +0000

>

> Hello all,

>

> The Washington State Department of Ecology is attempting to

> ban lead ammunition from sale, use, and ownership as part of

> its "Lead Chemical Action Plan". This plan is open

> for public comment until Monday, October 6th.

>

> The plan can be found here:

> <http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/>

> You may also find instructions on submitting comments at

> that URL.

>

> Let's act quickly: shooting sports have no

> representation in this plan. We must show our opposition.

> Take time to submit your comments to the Department of

> Ecology and to Governor Christine Gregoire.

>

> Christine Gregoire can be reached:

> Phone: 360-902-4111

> Fax: 360-753-4110

> Web contact form:

> <http://www.governor.wa.gov/contact/default.asp>

> Mail: Governor Chris Gregoire, Office of the Governor, PO

> Box 40002, Olympia WA 98504

>

> Thank you a ll for your help.

>

> Jay Summerfelt

From: Nancy Hecox

Sent: Friday, September 19, 2008 9:30:52 AM

To: Davies, Holly (ECY)

Subject: proposed lead ban

Ms. Davies

Dept of Ecology:

We are writing to strongly oppose the proposed ban on lead for fishing & hunting. At this time, there are no viable alternatives for lead. This ban on lead would in effect do away with these two recreational activities for most of us citizens of Washington due to the high cost of lead alternatives.

Please reconsider this proposed ban.

Thank you for your consideration.

Ray & Nancy Hecox

83 Koda Dr

Selah Wa 98942

1-509-697-5840

From: JHedal@aol.com
Sent: Friday, September 19, 2008 3:34:58 AM
To: Davies, Holly (ECY)
Subject: Lead CAP

That lead shot has already been banned should be the extent of your efforts. That there are areas where target practice takes place using center fire ammunition does in-fact limit the extent of lead slugs in the general environment. Where many animals killed with center fire bullets still have the bullet in them this keeps any lead in the bullet out of the hunting area. The number of times hunters fire at animals and miss is relatively small which completely invalidates the reasoning behind banning bullets with lead in them. Your extrapolation of number of hunting licenses to lead in the general environment has no basis in fact or even logic.

J.Hedal

Psssst...Have you heard the news? [There's a new fashion blog, plus the latest fall trends and hair styles at StyleList.com.](#)

From: Bruce Hedlund
Sent: Monday, September 22, 2008 11:13:14 PM
To: Davies, Holly (ECY)
Subject: Lead Action Plan

I have hunted for 30 years and don't know a single person identified as having been poisoned by lead as the result of harvesting game and then consuming it. Considering our state is in a huge budget deficit as the result of poor management and programs like this don't you think we have better things to spend our limited resources on?

I think this plan is ill conceived and a waste of tax payer resources. Let's find something of importance we can all get behind.

Bruce Hedlund
Northwest Fluid Solutions
11814 NE 116th Street
Kirkland, WA 98034
(425) 821-4515
(425) 650-8511 Fax
(425) 765-1800 Cell

Please visit our website at www.nw-fluid.com!

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From: Heffernan, Sue
Sent: Monday, October 06, 2008 12:23:35 AM
To: Davies, Holly (ECY)
Subject: Proposed Lead CAP Action Plan

Hi Holly

As a nurse at Seattle Children's Hospital for over 30 years and an active member of Washington Physicians for Social Responsibility, I would highly recommend strong action be taken to assess, evaluate, educate and eliminate lead in our state. There are numerous medical reports that state the effects of lead toxicity. Whatever the acceptable level, it is clear that a comprehensive, action oriented plan is needed sooner rather than later. Protection for those who work in hazardous environments is imperative. Better yet is elimination of this hazard where possible. Incorporating toxic exposures assessments in well child/adult health care visits is important, obtaining blood levels when indicated and incorporating simple measures first than more comprehensive measures later can only help us get on track with this very important health care and environmental issue.

Sincerely

Sue Heffernan, RN-BC, MN
CNS Nursing Professional Development
Seattle Children's Hospital

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From: Elaine Heinz
Sent: Sunday, October 05, 2008 10:23:23 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Elaine Heinz
6118 Lakewood Dr W #3
University Place, WA 98467

From: Emil Heinze
Sent: Saturday, September 20, 2008 2:13:44 AM
To: Davies, Holly (ECY)
Subject: Lead Ammunition CAP

Ms. Davies,

It is difficult for me to make an informed comment on the Lead Ammunition CAP since the Draft Lead CAP does not download. I'm not sure why.

My initial response has to be a strong no vote until I have a better understanding of any compelling reason to take the drastic step to eliminate lead ammunition.

Otherwise, this is clearly an attempt to infringe our 2nd amendment rights.

Thank you for listening.

Emil Heinze
Concerned citizen

From: Heller

Sent: Saturday, October 04, 2008 4:23:52 AM

To: Davies, Holly (ECY)

Subject: Lead CAP

Dear Ms. Davies: The proposal regarding lead ammunition in the Chemical Action Plan is fraught with danger to the point of being nearly unsatisfactory! There is no substitute for lead ammunition as it pertains to competitive smooth-bore (shotgun) disciplines involving fast-moving clay targets. Any ban, or any possibilities that could lead to a ban, would destroy the sport. It would be impossible to be competitive in in State or National events if one could not practice in one's own state with lead shot. The deleterious effect of a ban, a partial ban, or any initial steps that could later lead to a ban, would essentially close many sport-shooting clubs including the one to which I am a member. Additionally, having at one time been a federal officer licensed to carry a sidearm, I suspect that many law enforcement agencies would be reluctant to give up the extraordinary stopping power of lead. Please reconsider the dangerous implications of this initiative.

Bruce L. Heller

From: Steven Henigson
Sent: Thursday, September 18, 2008 4:53:55 PM
To: Davies, Holly (ECY)
Subject: Lead CAP and Lead Ammunition: a Comment

Lead CAP and Lead Ammunition: a Comment

While lead can be harmful to human and animal life in the general environment, lead and coated-lead bullets used in normal manners cause the least damage possible of all lead products.

Lead and coated-lead bullets are used in three general ways: to practice shooting skills, to defend against criminal assailants, and to kill game. In all three of these uses, only relatively minute quantities of lead are able to enter the general environment in ways that might possibly become harmful.

When used to kill game, only coated-lead or jacket-covered-lead bullets are commonly used. In most cases, those bullets are recovered during the game-butcher process after the kill is made, and never enter the environment. Such of these bullets which miss their intended targets contribute very little lead to the environment, because their lead is coated with longer-lasting metals that vastly retard lead exposure, and because such stray bullets are very few and quite far between. Hunting is not a meaningful source of environmental lead anyway, since people who hunt legally are well educated about making clean kills with the minimum number of shots fired. Further, relatively speaking, there are extremely few illegal hunters whose illegal actions, and their possible legal or illegal use of lead bullets, cannot be controlled by the laws or regulations they normally ignore anyway.

Lead bullets used against criminal assailants are indeed extremely harmful, but only to the assailant and not to the environment. Bullets which hit their intended targets are normally recovered for use as evidence by police and other county and state agencies, and thus do not enter the general environment. Bullets which miss are, just as in hunting, relatively few and far between, and neither cluster nor amass into profound sources of environmental pollution.

That leaves shooting-skill practice as the only possible source of environmental lead pollution from bullets. Shooting practice takes place in two different environments: formal shooting ranges, and wilderness land open to public use.

Formal shooting ranges are always arranged such that spent bullets land in purpose-made dirt berms and sand-traps. Periodically, these berms and sand traps are mined

for their lead, which has a meaningful resale-and-reuse value. Lead shards and dust that are not removed in these periodic mining operations remain in the purpose-made berms and traps, and do not enter the general environment. Even if these berms and traps should be left intact, rather than being mined or cleaned-up, their adverse environmental effect can be no worse than the same effects of a very small natural vein of lead or galena (lead ore). Since there is no call to remove all the naturally-occurring lead and galena from the environment, there should be no need to agonize over the relatively small amount of lead that may remain in a shooting-range berm or trap.

Informal shooting practice that takes place on wilderness land open to public use could become a significant source of lead pollution in the general environment, if that informal shooting were concentrated in just a few small areas and all of the spent bullets from it were concentrated in a few small areas of safe backstop (usually a section of bare hillside). There are two simple ways to handle this problem. If it is decided that it would be best to concentrate all informal shooting into a few small areas in order to control the exposure of lead, then the backstops of those few small areas could be periodically mined for their useful and revenue-producing lead content, thus keeping the lead in them from entering into the general environment. If informal shooting is to be allowed in a large, general area, then the spent bullets would end up scattered far and wide over that area, and each bullet could occasion very little environmental harm, including the effects of ingestion by random animals.

In sum, we suggest that lead and coated-lead bullets offer a miniscule negative effect to the general environment. That effect is indeed so relatively small that efforts to control or prevent it would cost a great deal more than the cost of remediating any damage (or potential damage) those bullets could possibly do. Thus such control cannot be cost-effective, and would represent a waste of effort and resources better aimed elsewhere.

We further suggest that regulation or prohibition of the use of lead and coated-lead bullets may be more in the realm of "backdoor gun-use prohibition" than it is in the realm of environmental protection. As such, lead-bullet regulation or prohibition should be carefully viewed through a very powerful glass, well before implementation.

Jean and Steve Henigson
18 Golf Estates Road
Raynham, WA 982 5
(360) 376-65 9

From: nwecop
Sent: Sunday, October 05, 2008 1:24:02 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Wanted to voice my objection to the plan.
This is too inclusive and deserves more consideration
before jumping ahead in a knee jerk action.

There are more important areas that need immediate
attention...and the concern is only valid if kept in
context of continued evaluation on the back burner.

If there was a concern of anykind for the preservation
of health and life, which there is not, shown by the
avoidance of major causing factors, but only as feel
good, grant consuming thoretical conclusions of
guess and by gosh, get published so called educated
faculty.

If there was concern, automobiles would not be on the
road, motorcycles would not be on the road..People
get killed in these vehicles, but no one cares...

The State of Washington Would not be in the business
of Alcohol, but oh, we need the money, we need to study
the "wild blue winged fur headed wood crab" it might
be going ex-stink. No one cares about drunk drivers
its all a sham...14 times arrested, 8 times arrested, and
still on the road...

This is a great example of the governmental attitued in
the state, we went after the sticky fise, the owl, the
other dumb action, and now Lead, which from the day
one we knew was bad for some, What take the lead out
of Pencils,,? What pay all who went to school with a
"lead" pencil, sue the teacher/county/state for ignorance.
woops, cant sue the state, they are exempt..

Lets look at things in perspective, and start with the worst
first and then work down the list, not start at the bottom and
work up,,,Like start in Olympia and ban Party politic's
make them responsible for their actions, make them personally
responsible, civilly and criminally and then prosecute them..

Don't Make Laws that are not enforceable, use practable
action. And let the people decide, I am tired of other people
making life decissions for me, Get out of my life...

Vic Henry
nwecop@tgi.net

From: Mark Herke
Sent: Monday, October 06, 2008 11:27:59 PM
To: Davies, Holly (ECY)
Subject: Lead Cap

Ms. Davies,

I am writing in concern to Ecology and Health's recent Lead Cap initiative.

I am opposed to the direction the State has taken with respect to lead.

First right up front: I oppose the use of the term "chemical" when discussing lead. In all but a few of its uses it's not a chemical. Granted in several uses lead is found in an alloy but these forms also do little if anything to making lead more pernicious.

The true character of lead is that of a naturally occurring element and a metal.

The term chemical not only misses the true nature or even the origin of lead BUT also causes one to mistakenly assume both fluidity (and thus great movement of lead) and artificiality of lead.

Lead is anything but mobile and more importantly lead is VERY non-reactive thus it is quite stable. The term alloy is used to describe any metal that's a mixture. By the nature of alloying one must melt all the constituents above their melting points. As the melting point of lead is well above 400 degrees F. That condition would be EVEN more rare in a natural setting. And the resultant alloy would also be stable.

I had an interesting exchange with an EPA certified lead inspector based in New York State recently and his concerns with lead included houses with old lead paint AND window sills of homes that were situated along dusty gravel roads.

He told me that lead ... once used in "leaded" gasoline was prevalent in the dust of older gravel roads with the dust being found on window sills AND that threat was greater even than that of old paint on the house proper (lead paint in the house being the number two cause of lead poisoning in children).

There is NO doubt that lead poisoning is a SERIOUS MATTER. What I object to is the State wanting to ferret out and reduce or ban ALL lead's uses whether the

risks are erroneous or begnine or problematic. Ie. more of a political witch hunt for lead and the active use of it..

An example:

The shooting industry

Every year, millions of rounds are fired by shooters.

Lead is the NUMBER ONE material for bullet construction yes, there are substitutes all copper bullets ... and steel cored armor piercing slugs come to mind. But for cost and flexibility you're talking LEAD.

For the most serious shooters/hunters the price of a non-lead bullet approaching three dollars in some instances this cost is just the cost of hunting. But imagine a target shooter or even one engaged in plinking (informal target shooting) paying that for a practice round

..... Currently a brick of 525 rounds of .22 Lr. costs about 12.00 on sale less than THREE CENTS! Add three bucks to that cost we are talking THREE BUCKS plus three cents

..... \$3.03 vs. \$0.03

The cost difference alone would CRUSH the hobby of hunting.

But there are more downsides to Banning or limiting lead usage in guns.

Detrimental effects to the firearm itself.

Muzzleloaders and older shotguns are UNUSABLE sans lead. In the case of older shotguns, non-lead shot damages the barrels to an unusable condition in a few shots. Muzzle loaders would be turned in a bomb device if one tried to force a standalone non-lead projectile down it's bore.

But even for modern firearms on a physical basis lead gives the firearms bore a much longer life.

The (late) eminent firearms authority Elmer Keith wrote in his book "Sixguns" that a revolver could be expected to barrel life expectancies of about 5,000 rounds with

copper jacketed bullets BUT with lead alloy or lead bullets this was comfortably expanded to 100,000 rounds.

Easily a 20 to 1 advantage for lead.

Keith's book was published in 1955 and steel making and for that matter barrel making technology has since advanced. It would be easy to assume that the copper jacket vs. lead only bullet wear ratio has narrowed but that is not the case. While copper jacket wear has lessened so the gun barrels are giving more life with lead as well. The goal post moved in the positive for any projectile the advantage is still with lead with the ratio of barrel life (copper jacket vs. lead) staying generally the same.

For years, skeet and trap shooting ranges have been recycling post fired lead shot. It is a secondary source of income. With the recent spike in metals costs recycling lead has accelerated even more. Recycling already underway lessens the amount of lead in place in the environment at any given moment.

I can think of MANY other industries that would be similarly affected battery technology electronics even balancing the lowly tire. I read where some employees of Ecology recently went to a tire store with a goodly supply of the new "green" wheel weights (made from Zinc). After much consternation the tire shop GAVE UP trying to balance the new tires for an Ecology dept vehicle because they could not mount enough of those lightweight but "green" wheel weights on the tires to achieve proper balance. Just as shooting ranges have for years and individual shooter more recently, industry has undertaken much recycling thus limiting the amount of lead lose in the environment.

In closing, I object to the term chemical used to describe an element, a naturally occurring metal, one that only in rare situations will combine with other materials and even then, in an alloy that quite literally requires several hundred degrees of temperature..... where on earth can one get a natural alloying of lead? The answer is NO you won't see lead alloy naturally ... the resultant alloy also being stable. Further the guns are best served with lead. Steel shot places undue strains on the shotguns themselves. The shooting industry spent great resources developing wads expressly for steel's abusive nature but any shooter is but one defective wad away from a damaged barrel. Guns such as rifles and handguns (with their associated rifling grooved barrels) lend themselves poorly to this sort of treatment. Equally important, COST of shooting would raise so substantially by banning or restricting usage of lead projectiles that the shooting industry would be CRUSHED! Crushed to such an extent to constitute an affront to the Second Amendment!

The Depts. of Ecology and Health resources would be much better spent addressing those particular instances where the public REALLY intersect with lead such as old gravel roads with those resultant dusty window sills and old paint in old structures rather than a wholesale "ban all" approach as LEAD CAP represents

Mark Herke

From: Dale Herling
Sent: Friday, September 19, 2008 6:20:03 AM
To: Davies, Holly (ECY)
Subject: Draft Lead Chemical Action Plan (CAP)

Dear Holly Davies,

Concerning the proposed Draft Lead Chemical Action Plan, please consider my concerns when contemplating restrictions of lead in some products.

There is no adequate substitute for lead ammunition and that any affects on humans and wildlife do not justify a ban lead in lead based ammunition as recommended by the Department of Ecology.

I have lived in Washington most of my life and just recently retired. One of my favorite activities is .22 target shooting. If lead is banned in ammunition...this will be one more needless legislative measure that limits our rights to pursue hobbies that are meaningful to so many folks.

Please consider the impact to those of us that enjoy target shooting in your deliberations.

I speak not only for myself, but also the majority members of our local shooters association.

Thank you,

Dale Herling

From: Wendy L Hernandez
Sent: Thursday, October 02, 2008 1:05:18 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Wendy L Hernandez
57588 State Route 20 #33
Rockport, WA 98283

360-873-4090

From: Steve

Sent: Thursday, September 18, 2008 7:16:39 AM

To: Davies, Holly (ECY)

Subject: Lead Chemical Action Plan

In specific I would like to comment on the section pertaining to ammunition. All of the speculative damage to birds is related to shotgun ammunition and specifically ammunition that is used to wound or is somehow dropped into the food chain. Despite the speculative nature of this information related to bird deaths I would like to point out that lead used in rifle and pistol ammunition is NOT used to wound nor does it find its way into the food chain as MIGHT be expected from shotgun pellets. There is NO information that would support a ban on lead in rifle and pistol ammunition in this report. Outdoor ranges are not places frequented by birdlife and their dirt backstop is not likely to qualify as bird feeding grounds. This appears to be an unwarranted attack on shooters and hunters that is in effect and "end run" with the aim of making ammunition more scarce and expensive.

Respectfully

Stephen Herron

19880 Mosjon Cir NE

Poulsbo Washington 98370

From: David Heywood
Sent: Thursday, October 02, 2008 12:30:44 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

David Heywood
1208 Arcadia St. NW
Olympia, WA 98502

From: Bobbi Hickox
Sent: Thursday, October 02, 2008 7:30:54 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Bobbi Hickox
7941 Mullen Rd. SE
Olympia, WA 98503

(360) 491-9141

From: bob501w@comcast.net
Sent: Sunday, September 28, 2008 5:53:34 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

I have briefly reviewed the report and agree with findings related to environmental issues in housing. Where limitations on the use of lead ammunition is concerned, however, it is clear from the Sept. '08 publication 08-07-025 that DOE has a negative bias. Lead is found in the majority of rifle and pistol ammunition as well as lead shot for shotgun due to its density. Few other metals offer the benefits of lead in ammunition, especially at a reasonable cost. Most hunters using non-toxic shot for hunting birds use lead shot for practice due to the high cost of the non-toxic hunting loads. Far more ammunition is used for practice and competition than in hunting birds or other animals. Further, other than shotgun shot, no practical non-toxic ammunition has been created for pistols or rifles. And so called non-toxic ammunition created for special applications is generally not available to the public as it is used for military purposes to defeat armor or other hardened targets.

Therefore, outlawing all lead products and then creating a list of exceptions is not a method that any sportsman, target shooter or other non-hunting firearms users would support.

Bob Higbie
501 W 39th St.
Vancouver, WA. 98660

360-606-1279

RECEIVED

OCT 06 2008

September 25, 2008

DEPARTMENT OF ECOLOGY
OFFICE OF DIRECTOR

Washington State Dept of Ecology
300 - Desmond Dr SE
Lacey, Wa. 98503

RE: PUBLIC COMMENT

It has Come to my attention that the Dept of Ecology is considering a BAN of LEAD in Ammunition within the State of Washington.

I believe a ban would be ill conceived and based on Political opinions that include a bias against hunting, and shooting sports, and even firearm ownership itself.

The Federal Government requires non-toxic shot for waterfowl hunting which addressed lead in waterways years ago, HOWEVER NO Adequate substitute for lead ammunition used in rifle, pistol or muzzleloaders exists, and ANY SUPPOSED Affects on Wildlife or Humans does not justify a ban as proposed (now or in the foreseeable future) by the Dept of Ecology.

At the end of the day lets call this proposed Ban of Lead for what it really is - a group of Environmentalists producing an artificial problem moving to stop sportsmen and the shooting sports.

I understand a conference was held in Idaho earlier this year, I cannot help but wonder - were the ammunition manufacturers, sports groups, gun clubs, the National Rifle Association, or the National Muzzleloading Rifle Association included to add commentary.-??? I would bet the attendee's were hand picked, and against lead in anything.

If the Dept of Ecology wished to do something positive, WHY not provide an incentive for gun clubs etc to reclaim and recycle the LEAD.

Sincerely,



Harold P. Hill (retired Bellevue, Wa. Police Officer / ret SFC, US Army)
1306 - W. 3rd St
Grandview, Wa. 98930 Hm Ph 509-882-3835

From: Sandy Hillock
Sent: Thursday, October 02, 2008 11:07:58 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Sandy Hillock
302 Wells Road
Pe Ell, WA 98572

From: KW Hipps
Sent: Monday, October 06, 2008 12:28:59 PM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Please do not implement any changes that would mandate lead free center fire bullets or outlaw lead shot (shotgun pellets) for use on practice ranges.

The often quoted Scheuhammer studies were of lead shot in game birds and did not address rifle bullets in game animals. To the best of my knowledge no reputable study (excluding the infamous dermatologist's report) has shown any connection between significant amounts of lead and meat samples taken away from the wound channel in mammals killed by a single bullet. In fact, the high weight retention of modern hunting rounds makes significant lead contamination highly unlikely.

While shot distributions in the hunting field may be a problem for feeding birds, the situation in a skeet, trap, or sporting clays range is completely different. In these cases all the expended lead remains within a small well defined geographical area. It represents an infinitesimally small danger to birds and can be easily remediated. I am told by members of the Lewiston Pistol Club that their shotgun range actually generates money for them as they have it mined on a periodic basis.

Pistol and rifle clubs are even less threatening. The final location of bullets is much more localized (within well defined berms) and the number of projectiles (bullets) is far less.

Thus, I would argue that there is still a place for lead ammunition, especially for practise purposes and sporting events staged within well defined ranges.

I should note that access to lead bullets for reloading purposes is extremely important for those of us engaged in high volume pistol competition. We routinely fire tens of thousands of bullets a year. Having to purchase these as loaded ammunition, or as significantly more expensive copper bullets, would kill a number of pistol sports such as USPSA and Steel Challenge (headquartered in Washington).

Best wishes, KW Hipps

K.W. Hipps
Chairman, Department of Chemistry & Materials Science Program
Fulmer Hall

PO Box 644630
Washington State University
Pullman, WA 99164-4630
(509) 3353033 (509) 335-4520
hipps@wsu.edu
<http://www.wsu.edu/~hipps/>
<http://www.materials.wsu.edu/>
<http://www.wsu.edu/~nano/>

From: Amie Hirsch
Sent: Thursday, October 02, 2008 8:13:10 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Amie Hirsch
2210 Minor Ave. E., Apt. 7
Suite 540
Seattle, WA 98102

From: Jennifer Hisrich
Sent: Thursday, October 02, 2008 8:53:01 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

I have a 10 year old daughter with many delays. Don't let this happen to more parents.
Sincerely,

Jennifer Hisrich
2816 128th Ave SE
Bellevue, WA 98005

From: Keith Hixson

Sent: Sunday, October 05, 2008 1:29:53 PM

To: Davies, Holly (ECY)

Subject: Lead from Ammunition:

This proposal has nothing to do with exposing people to lead and avoiding lead poisoning. It is a sneaky way to institute gun control.

Its a joke.

The little exposure that lead ammunition does to environment is so very minimal it would be nearly impossible cause any major environmental damage.

You liberals are just a bunch of sneaky lying liberal environmentalists. Your proposal has nothing to do with chemical exposure and danger to public health and everything to do with gun control. Shame, shame on you!

Keith Hixson

Ellensburg, WA 98926

From: Jana Hobbs
Sent: Monday, October 06, 2008 7:34:23 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Jana Hobbs
13506 NE 66th St
Suite 540
Kirkland, WA 98033

From: joel hoffman
Sent: Monday, September 22, 2008 9:48:13 PM
To: Davies, Holly (ECY)
Subject: lead ban

This is a knee jerk reaction. The ban will place undue hardship on sportsman as there is no cheap alternative to lead. This is merely an attempt to try and reduce hunting and shooting.

joel hoffman
jjh137@earthlink.net
EarthLink Revolves Around You.

10-6-08

To Hally Davis

Lead studies have been done on Civil war battle fields & no contamination has been found. I resent the fact that your people will do anything to restrict the rights of honest citizens. If you want to make a name, go after the rail road they are the biggest polluters in the United States.

Greg Hogen

Maintenance Director

Tri Cities Metallic Silhouette Club.



From: Dwight & Gayle

Sent: Saturday, October 04, 2008 12:08:39 PM

To: Davies, Holly (ECY)

Subject: Circular about potential restrict/ban of lead bullets and fishing gear...

Attachments: scan0006.pdf

Holly Davies
Dept of Ecology
PO Box 47600
Olympia, Wa 98504-7600

Holly,

Today while buying ammunition at Sportsman's warehouse I saw the attached flier. I hope this is just a bad joke.....

Lead bullets and lead fishing lures/weights are such a large part of our history and culture. Lead bullets and fishing lures/weights are made of lead for a specific reason - they need the weight. What metal or substance can replace it? The large majority of lead bullets used today is being recycled. Most all outdoor shooting ranges eventually dig up the dirt and recycle the lead. All indoor ranges trap the lead and recycle it. The amount of lead that is remaining in the environment today from bullets is minimal. With the exception of some hunting most shooting is done at shooting ranges as there is little open area to shoot at anymore. There is a very small portion of the lead bullets being recycle by emergency room doctors and coroners. To ban or restrict lead bullets would be very much a knee jerk reaction with environmentalist whacko overtones.

As to lead lures and weights. Again, losing fishing gear is usually the exception to the rule and the amount involved hear is minimal.

A ban or restriction on lead for bullets and lures is a ridiculous, unnecessary and a waste of our tax money - spend your time and money more wisely.

Dwight Holmes
14660 Channel Dr
La Conner, Wa 98257
360-466-1448

Retired law enforcement - 32 yrs.

From: Stephen and Anna
Sent: Tuesday, September 23, 2008 1:51:12 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Ms. Holly Davies,

I have read the Lead Chemical Action Plan and do not believe that the inclusion of Shot and bullets needed nor appropriate for the purpose that it was intended. I noticed that bullets and shoot was last on the list of 9 items that contain lead in our lives, batteries plastics paints weights (?) etc. This is not a matter of real life ecology and there is no proof that there is an on going problem of lead bullets in the environment. When lead shot was banned for hunting water fowl and upland game that had a need and merit. It was welcomed and abided by the hunting community but for bullets to be included this new Lead Chemical Action Plan is does not address any of the same problems. I do not believe that it is an appropriate category on your list of lead contaminates. I also think that there was not enough lead time for the public to know that the public was invited to a public meeting about the Draft CAP. Thank you.

Sincerely,

Stephen Holtz
Vashon, WA. 98070

From: Dave Hood

Sent: Saturday, October 04, 2008 11:47:58 PM

To: Davies, Holly (ECY)

Subject: proposed ban on lead bullets and fishing weights

Dear Ms. Davis

As a sportsman and a Washington State resident, I oppose this proposed ban.
I hope that you will too.

Yours truly,

Dave Hood

North Bend, WA 98045

Never knock on Death's door. Ring the bell and run. He hates that

OCT. 3RD 2008

TO: HOLLY DAVIES
DEPT. OF ECOLOGY
OLYMPIA, WA. 98504

RE- THE WA. ST. LEAD, CHEMICAL ACTION PLAN. DRAFT.
I AM A RETIRED WASH. ST. FISH + WILDLIFE OFFICER
WITH 30 YRS OF WILDLIFE LAW ENFORCEMENT HERE IN WASH.
AND 10 PLUS YRS. IN OHIO.

I AM OUTRAIDED WITH THE BIAS IN THIS DRAFT
ITS ANTI HUNTING,

THERE NO COMPARISON TO HUNTING BIRDS OVER WHEAT
FIELDS AND GRASS LANDS, + ROCK HILLSIDES TO LAKES + MARSH LANDS.

WE NEED TO BAN LEAD SHOT ON THE WET LANDS
WHERE WATER FOWL IN LARGE NUMBERS USE THE WET LANDS
ALSO IN AREAS LIKE THE CALIFORNIA CONDOR RECOVERY AREA
BUT NOT IN THE REST OF THE STATE.

Jim Hood
16444, WHITEHAW RD.E.
WILBUR, WA. 99185

RECEIVED

OCT 07 2008

From: Teresa Hopkins
Sent: Monday, October 06, 2008 4:29:38 AM
To: Davies, Holly (ECY)
Subject: Do More On Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am truly thankful that the Department of Ecology is developing a plan for phasing out the use of lead in our state. But the draft plan is not comprehensive enough.

Please take this opportunity to take bold steps to protect our children. We all now know how dangerous lead exposure is. And the truth is it far too prevalent in our daily environments.

Please put into the plan steps to eliminate lead in consumer products like clothes, cosmetics and vinyl products. I know we can't do it all at the state level, but let's do what we can. Lower the state's blood lead action levels for children, workers and other vulnerable people.

Again, thank-you for taking this initiative but please make it even stronger -- do all you can to protect public health, especially for children, in our state.

Sincerely,

Teresa Hopkins
1826 1st St
Suite 540
Kirkland, WA 98033

(425) 828-4943

From: Janelle Hopper
Sent: Friday, October 03, 2008 1:37:24 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Janelle Hopper
1701 235th Pl SW
Bothell, WA 98021

(425) 908-7755

From: JLnTH@aol.com
Sent: Monday, September 22, 2008 12:13:10 AM
To: Davies, Holly (ECY)
Subject: Draft Lead Chemical Action Plan (CAP).

Holly Davies
Dept of Ecology

This email is to tell you that I strongly oppose this plan. I understand this action in bird hunting but not for other game animals. Copying California on everything is not the best way to help our state. They do not have the elk, deer, moose, grizzly bear and our other forested animals. As a life long hunter in this state I can tell you that the licensing fees that are paid by the hunters help manage our animals very well.

Thank You

Tom Hopper
Anacortes, Wa

Looking for simple solutions to your real-life financial challenges? [Check out WalletPop for the latest news and information, tips and calculators.](#)

From: Lance Howard

Sent: Monday, October 06, 2008 12:45:36 PM

To: Davies, Holly (ECY)

Subject: lead issues

I am not a resident of your state, but I have enjoyed my visits to your state. I am a competition clay target shooter and have some comments about the lead shot issue. I am a past president and range master of a large California clay target shooting club. The Novato Trap club, where we have been controlling the lead content of the shooting range beginning in 1977. No one had ever heard of the idea or need to recycle lead shot or protect the soil from lead shot contamination at that time. We did it because we could use the recycled shot to cut the costs involved in reloading the shotgun shells needed to play the games by a significant amount. I would like to inform you to the fact that almost all clubs that I know of have been recycling the lead shot for years. This does not mean that the lead is not deposited onto the ground, but it is picked up routinely because of the value. In my 38 years involved in the sport I have never heard of a single problem with lead poisoning from either ingestion of lead from the shot fields or water contamination due to high content of lead. The gun clubs have been ahead of the curve for years and we are always the brunt of unreasonable legislation. Your real concerns should be aimed at sloppy manufacturing that consumes lead in a manner that allows unnecessary waste, such as batteries and electronic parts manufacture. I find it hard to believe that even thousands of shooters and hunters could ever put enough lead into the environment to pose a health hazard to the people. If you are walking through the same woods that hunters use, could you honestly imagine that the ground you are walking upon would give you lead poisoning? There just is no science to back up the claims from the extremist groups. The real and sad truth here is usually an attempt to put the gun owner into the second class citizen category. Here in California we have suffered the consequences of the Condor lead bullet ban, which will do nothing for the Condor but has presented a very real problem for farmers and ranchers that cannot allow the shooting of ground squirrels with the only affordable weapon left in this nation which is the 22 rimfire shooting a solid lead bullet. I guarantee you that within 2 years the use of some very nasty poison is going to have to be considered to control the crop loss. That poison kills everything and that means the birds of prey of all species as well as the coyote and fox are going to perish all in the name of banning the lead bullet. The science here was flawed as well and ignored by the special interests pushing the ban. Our Governor caved in. I hope your governor is much more intelligent. Please provide her with the truth and the right information so that this does not become worse than California. I do not know if you have any concern for any traditional American recreation, but clay target shooting qualifies. Consider the damage that will be done to your state's economics concerning the loss of a wonderful sport all in the name of prohibiting a substance that properly handled does no harm to general public. Consider also the very real loss of a tradition in your state. That is the Grand Pacific Trapshooting tournament that has been held in Washington state for many years.

American and Canadian shooters come together in Washington to shoot this tournament every year and it brings considerable money to your economy. I appreciate your concerns about lead in the environment. I am a building contractor as well as a clay target shooter and I deal with lead in old painted wood on a daily basis. Unless you sand or grind the old paint and breathe the dust or put lead paint particles into your mouth you can not suffer harm from the product. Again, it involves common sense when it comes to handling lead products. Considering all the shooters in entire state of Washington and all the other states for that matter, unless you inject the lead from the ground shot into by the hunter you cannot get lead into your system. Please, consider what you are doing here. No one, especially clay target shooters and hunters would wish harm on another, but reason should prevail in this matter. Your state restrictions of lead should be focussed on its use in the workplace and how it is used in products that are in daily contact with humans, such as paint, furniture, air quality (sanding and grinding) thinners, primers and coatings that could be a hazard if uncontrolled. Thank you for your time. Please think about the real issues before acting on the special interests of parties that have an agenda that really is not about lead, it is about another way to control the freedoms of every day folks like me.

From: Laura Huddlestone
Sent: Thursday, October 02, 2008 2:16:09 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Laura Huddlestone
5222 18th Ave SW
Seattle, WA 98106-1549

From: edward hueneker
Sent: Friday, October 03, 2008 2:49:27 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

edward hueneker
po box 834
freeland, WA 98249

(360) 331-5806

From: Michael Huffman

Sent: Thursday, September 18, 2008 4:19:17 AM

To: Davies, Holly (ECY)

Subject: Lead CAP

Holly,

I appreciate your efforts to reduce pollution in our state and keep it nice. Lead, however, is an important part of the core of ammunition; there really is no viable substitute. The idea of banning ammunition containing lead (almost all of it does) reeks of an under the counter attempt to limit availability of ammunition altogether. Will this ban affect the military or police? I doubt it. If it only affects the private citizen it is wrong. I'm sure there are other very significant health risks posed by other offenders that are easier to deal with. Let's take on public transportation for instance. I see buses with only 3 to 5 people riding them all the time. Let's look at fixing that problem.

MICHAEL HUFFMAN

MICHAEL.HUFFMAN@EARTHLINK.NET

PHONE (253) 984-0884

FAX (253) 984-0027

From: Nick

Sent: Monday, October 06, 2008 11:15:05 AM

To: Davies, Holly (ECY)

Subject: Proposed regulatory action involving lead ammunition - COMMENT for the record

Dear Ms. Davies,

The planned action, specified below, to include lead ammunition in the CAP, comes as a surprise. We don't believe sufficient public notice was given to include this specific in any planned regulatory guidelines by DOE at this time. I also don't believe the amount of lead from bullets in the environment is sufficient to make a significant or even minimal impact on our soils and public health in any way. Especially, when taken in context with batteries of all kinds. To ban the use of lead in bullets would, if nothing else, cause extreme danger to police and other armed forces, forcing them to use bullets of inferior knock-down density and weight, and seriously affect accuracy, putting others at risk as well. When applied to hunting, the same affects will cause undue suffering to animals by reducing the killing power of bullets - their primary purpose after all. I also don't believe that for small shooting ranges, lead becomes a serious environmental threat because the lead from the bullets used in target practice is concentrated in a very small area.

the wording below is from the specific section of the proposed draft plan to limit lead in Washington State:

"Lead from ammunition is one of the many sources of this metal covered in the draft Lead Chemical Action Plan (CAP). The CAP is a planning tool to guide statewide efforts to reduce lead exposures in the environment. The goal is to lower the amount of lead people are exposed to. The Washington Department of Ecology is committed to reducing toxic threats. The chemical action plan (CAP) is one of the tools used to carry out this priority work. CAPs deal with substances considered "the worst of the worst" for human health and the environment. Each CAP looks at the sources of exposure from a toxic substance and recommends ways to reduce that threat. Earlier CAPs have dealt with mercury and PBDE flame retardants."

I strongly urge your committee to reconsider this section of the plan and at least allow time for police agencies and sportsmen to comment. The notice I have belatedly seen was for 2 meetings in September, one in Seattle and one in SPokane, not large areas for a concentration of sportmen shooters to attend. More meetings in more accessible locations are needed for public comment as well.

Thank You,
Nick Hughes
Yakima, WA

From: Charles Hurt
Sent: Sunday, October 05, 2008 12:01:54 AM
To: Davies, Holly (ECY)
Subject: lead ammunition

To Whom it may concern,

Please do not adopt any ban on lead ammunition. Most of the ammunition that has lead in it also has a copper covering and the lead is only exposed when the target is hit. I cannot believe the minute amount of "possible" exposure is a danger to the public. Also please keep in mind that those of us who "chose" to use lead ammunition know what we are exposing ourselves to and we do not need the government protecting us from it.

Sincerely,

CW Hurt

See how Windows connects the people, information, and fun that are part of your life. [See Now](#)

From: Don Imhof

Sent: Wednesday, October 01, 2008 12:15:49 AM

To: Davies, Holly (ECY)

Subject: Lead CAP

Holly, If shooting ranges are effected or shut down buy this, I believe it would put more people out shooting in unregulated areas. The potential for accidents and spreading lead will be greater. Hunters and competition shooters practice and hunt/compete with the same ammunition. You change a bullet and you change accuracy.

The cost of ammunition has gone up sharply and going to solid copper bullets would drive it up even more, not to mention the possibility of big game animals being hurt instead of a clean kill. Thank you for your time.

Donald J. Imhof Member Custer Gun Club and Hunter.

From: Garliman@aol.com
Sent: Monday, September 29, 2008 8:38:49 AM
To: Davies, Holly (ECY)
Subject: Ammunition ban

Holly,
There is no adequate substitute for lead ammunition, and the affects on humans and wildlife do not justify a ban.
Thank You

Gary Inman
6304 - 188th St SW
Lynnwood, WA
425-774-8142

Looking for simple solutions to your real-life financial challenges? [Check out WalletPop for the latest news and information, tips and calculators.](#)

From: Isom, Carl A
Sent: Wednesday, October 01, 2008 2:55:53 AM
To: Davies, Holly (ECY)
Subject: CAP

I will be monitoring this socialist attempt at subverting the 2nd amendment and you can bet your last dollar that I WILL vote against anyone who thinks this is a good idea. Likewise I will tell everyone I know who owns a gun and enjoys the basic freedom to shoot that gun to vote against the supporters of this REALLY BAD IDEA!!!

Carl

From: Isom, Carl A
Sent: Saturday, September 27, 2008 3:07:47 AM
To: Davies, Holly (ECY)
Subject: CAP

This is nothing short of a thinnly veiled attempt by liberals to ban lead ammunition and therefore, due to the lack of readily available, reliable alternatives render guns useless over much of Washington State. Rest assured I will be following this proposed action. Should it be implemented I will most assuredly vote against anyone who votes for it when the next election comes around. I will NOT forget and I WILL alert all of my friends and relatives to this willful attempt to subvert the second amendment to the constitution.

Carl Isom

From: Stephen Iszler
Sent: Thursday, September 18, 2008 9:31:30 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Holly Davies
Dept of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Dear Holly Davies,

The "Lead Chemical Action Plan" as proposed by the Department of Ecology is preposterous, and is only one more method anti-gun activists are attacking 2nd Amendment rights.

Despite the rights granted by the 2nd Amendment of the US Constitution and the recent decision by the US Supreme Court upholding the right to keep and bear arms, activists and environmental extremists now try to eliminate the ammunition required to make firearms function.

Opponents of firearms and ammunition know full well there is no adequate substitute for lead ammunition and any effects on humans and wildlife is so minuscule and insignificant as to never to justify a ban as recommended by the Department of Ecology. This is clearly an infringement on 2nd Amendment rights.

Please reconsider this frivolous and ridiculous action plan.

Thank you,

Stephen Iszler
1747 McNeil Cir
Dupont, WA 98327
(253) 912-0438

From: Joy Jaber
Sent: Thursday, October 02, 2008 8:45:34 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate ALL exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Joy Jaber
Hansville, WA

Joy Jaber
37320 Buck Road NE
Suite 540
Hansville, WA 98340

360-638-0090

From: ERIN JACKSON

Sent: Thursday, September 18, 2008 3:49:58 AM

To: Davies, Holly (ECY)

Subject: Lead Chemical Action Plan

There is no adequate substitute for lead ammunition and that any affects on humans and wildlife do not justify a ban as recommended by the Department of Ecology.

Thanks!

Erin Jackson

Get more out of the Web. Learn 10 hidden secrets of Windows Live. [Learn Now](#)

From: Richard Jacobson
Sent: Saturday, October 04, 2008 6:03:08 AM
To: Davies, Holly (ECY)
Subject: Lead ammunition

I am writing to let you know that I strongly oppose any bans, complete or partial, on lead ammunition. Lead ammunition has been used for hundreds of years with no adverse effects. The recent attempts to ban lead ammunition are just ploys started in the state of California as a "back door" effort to control and reduce the usage of firearms. Washington does not have to follow California's lead, like the Pied Piper. Banning lead ammunition will only increase the costs of hunting. What's next, are you going to ban lead from fishing sinkers, too?

Regards,
Richard Jacobson
700 Robertson Rd
Longview, WA 98632
rjacobson@winnebagoind.com

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From: Diana Jain
Sent: Monday, October 06, 2008 4:51:42 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Diana Jain
10413 120th Ave Ct KPN
Suite 540
Gig Harbor, WA 98329

From: Sandi James
Sent: Friday, October 03, 2008 7:56:05 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Sandi James
3949 S. Hudson
Seattle, WA 98118

From: Loretta Jancoski
Sent: Thursday, October 02, 2008 8:58:52 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Loretta Jancoski
14948 256th Ave. S.E.
Issaquah, WA 98027

(206) 392-5087

From: td.jarboe@verizon.net
Sent: Saturday, September 20, 2008 2:35:22 AM
To: Davies, Holly (ECY)
Subject: Lead Ban in Washington State

Hello.

I want to comment on the study to eliminate lead in Washington State. As a hunter and recreational shooter, I am opposed to this ban for several reasons. First, it has not been conclusively proved that lead from ammunition has proven harmful to the general population. Second, 99% of hunting and shooting is done in remote areas or controlled shooting ranges that do not affect the general population. Third, lead has already been banned in waterfowl areas where lead could be hazardous to game but a complete statewide ban is ridiculous and unnecessary.

Thank you for the opportunity to provide comments.

Tim Jarboe

Mukilteo, WA.

From: Phil Jarmer
Sent: Thursday, October 02, 2008 9:42:39 AM
To: Davies, Holly (ECY)
Subject: Re: lead bullet ban

Thank you for your reply. After reading the draft I still think it is a waste of time to consider it. In high use areas such as duck clubs and popular waterfowl area lead maybe a problem and the use of steel has addressed the problem but the odds of a gut pile containing lead are astronomical. Most hunters use rifles with enough energy to penetrate clear through big game. If a proper shot placement is used the lung heart area is the target and the bullet will usually pass through leaving little if no residue of lead behind.

After switching to steel I lost more ducks to crippling than I ever did with lead shot because of the poor ballistics of steel. So did we gain because ducks were not ingesting lead or lose because more ducks were being crippled? The end result was the same a dead duck. I cannot afford the alternatives to steel that supposedly have better ballistics so I stick with steel.

I here complaining from wildlife people about the down turn in hunting license sales. Well no wonder if one can't afford \$2.00 a shot for a bird and some rifle ammo is now \$50 a box no wonder people are giving it up. I see this type of rhetoric just adding to the problem.

----- Original Message -----

From: Davies, Holly (ECY)
To: Phil Jarmer
Sent: Wednesday, October 01, 2008 9:04 AM
Subject: RE: lead bullet ban

Thank you for sending in your comments on the Draft Lead CAP. Ecology is not proposing a ban on lead ammunition in the Draft Lead CAP. We would like to work with hunters and shooters to promote non-toxic alternatives to lead and reduce releases without negatively affecting hunting or shooting areas.

We are required to consider all the options and include all the options in the CAP (WAC Chapter 173-333). We have to include a no-action option, an option that results in the phase out of uses and releases, an option to manage the chemical to reduce exposures, and other options such as available substitutes. After considering all the options, we decided to recommend working with stakeholders on voluntary steps.

There is an important correction in Ecology's draft Lead Chemical Action Plan (CAP). On page 233, Recommendation 9, stated "In areas where WDFW has required non-toxic shot, other non-regulated activities such as target shooting and shooting ranges should be prohibited from using lead shot." This language has been deleted. This language was inadvertently left in the draft CAP from a previous draft and is not our recommendation. As we have stated, Ecology does not recommend a ban or regulation of lead in any type of ammunition beyond current law. Our recommendation is to work with WDFW, hunters and shooters in development of voluntary approaches to reducing harm caused by the use of lead shot. The inclusion of the language above is an oversight, and has been removed from the draft CAP, which is currently out for public comment.

Please take a look at the focus sheet we prepared about lead ammunition and the Draft Lead CAP. I've attached the fact sheet to this email or you can access it at:

<http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/>

Sincerely,

Holly Davies, PhD
Chemical Action Plan Developer

SWFAP/ Industrial
WA Department of Ecology
PO Box 47600
Olympia, WA 98504-7600
Phone: 360.407.7398
Fax: 360.407.6102

From: Phil Jarmer [mailto:pjarmerz1@charter.net]
Sent: Tuesday, September 30, 2008 3:51 PM
To: Davies, Holly (ECY)
Subject: lead bullet ban

This idea is a waste of time there is no proof of what is claimed about lead fragments in game and down the food chain accusations. I am 68 years old and have fed my family a lot of deer and elk as well as bear that have been harvested with a lead projectile with no ill effects. I believe this to be an anti hunting anti gun idea and should not even have time wasted on it. I guess I can't expect much thinking in a state run by a two out of three loser.

No virus found in this incoming message.

Checked by AVG – <http://www.avg.com>

Version: 8.0.173 / Virus Database: 270.7.5/1702 – Release Date: 10/1/2008 9:05 AM

From: Craig P. Jenkins
Sent: Thursday, September 18, 2008 5:01:12 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan (CAP)

Howdy!

I want to express my views regarding the proposed lead chemical action plan (CAP).

I think CAP, as it applies to ammunition, is nothing more than 'feel-good' politics at the very least. And I also think, at the most, CAP is back-door politics for the anti-Second Amendment crowd to disarm our free nation.

When I look back at banning lead from paint, that move is just plain common sense. After all, paint can be found almost anyplace we find children, so it makes perfect sense to clean up common paint. Firearms are an entirely different matter. First of all, children & lead from ammunition, do not come into common contact, like children and household paint do. Also, there is no fair scientific proof to show lead from firearms is reaching the human food chain in sufficient amounts to have any measurable impact. Furthermore, the CDC requires all cases of diagnosed lead poisoning to be reported to them, which, if I recall correctly, is about 50 cases a year – none of which are attributed to lead from firearms. As for saving condors, vultures, or any other vermin that eat carrion and may ingest lead in the process, I ask this, what does it matter? I have lost track of all the studies presented in fish & game publications that show how birds that are hit with lead shot and live, usually live a relatively healthy life, however, similar hits with non-lead shot result in infection and a long slow miserable death. The reason given is the body will encapsulate the lead preventing further toxic shock, but it will not encapsulate steel, stainless steel, copper, bismuth, 'heavy-shot', or any of the other non-lead alternative ammunitions. Animals that eat carrion, and are shown to have a high level of lead in their blood, are just that, animals with a high level of lead in their blood. Nobody knows where the lead came from. The argument is the lead came from a firearm, but this does not stand up to scientific study, as has been shown in many publications. For lead to reach the blood stream, it must be no larger than some minimum

size that can be absorbed through organs and pass into the blood stream, as in the lead that use to be in paint. Bullets and shot are much greater than this minimum size, therefor, when these are ingested, it simply passes on through the digestive tract and out the south end of whatever ate it. The amount of lead residue that may result from a firearms discharge, stay with the ammunition through its trajectory, then transfer to the target upon impact is inconsequential as proven by millions of successful hunters and their families that eat wild game.

Please, do not let petty political agendas guide public policy. Do not impose any further restrictions upon ammunition.

Sincerely,

Craig P. Jenkins
Ione, WA

From: ronald johanson
Sent: Friday, October 03, 2008 12:49:17 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

ronald johanson
202 - 6th Avenue South
Suite 800
Seattle, WA 98122

From: Don Johnson
Sent: Friday, September 19, 2008 3:57:30 AM
To: Davies, Holly (ECY)
Subject: Lead action plan

Hello my Name is Terry Johnson and I am against the proposed ban on lead bullets.

From: Jeff

Sent: Friday, September 19, 2008 12:10:22 PM

To: Davies, Holly (ECY)

CC: Bob Caldwell; Dave Hansen; Dwight Hughes; Gary Abbott; GARY SPERLINE; James Dorwin; Jeff Scriven; Joe Bob; kip wood; lars hansen; matthew mcwherter; Michael Birge; Mitch Farmer; Morgan Johnson; Paul Springer; Rayne Beaudoin; Ryan Gillihan; steve slostad; Thomas Bradfield; Tony Cornwell; unknown user

Subject: Opposition to banning lead based ammunition

Dear Ms. Davies;

I am writing you to voice my opposition to banning lead ammunition. There is no Scientific evidence that lead based ammunition is a the culprit of lead toxicity to the public or anything else. Lead is a natural element. Poisoning is based on constant exposure at high levels over an extended period of time and that source can be scientifically traced. i.e. lead based paints, lead in solder used in plumbing/construction, fumes from smelters, mining operations and inadequate disposal of wastes from industrial sources.

The banning of lead based shot from waterfowl hunting was based on shoddy scientific methodology, documentation and assumptions.

I urge you to stay with the facts not some other hidden agenda.

Sincerely;

Jeff Johnson

Kennewick WA.

From: Vermillion, Kathy (ECY)
Sent: Saturday, October 04, 2008 12:30:21 AM
To: Davies, Holly (ECY)
Subject: FW: Lead

From: KB Johnson [mailto:kbbjohn@comcast.net]
Sent: Thursday, October 02, 2008 9:10 PM
To: Vermillion, Kathy (ECY)
Subject: Lead

Why pick on the little guy... Try the big guys, like car, trucks
company who dump into our lake and streams. These
cars, if they pass the tight control get 50% of the licence
tabs. Reward don't good deeds.

K.B. Johnson

From: Nancy Johnson
Sent: Saturday, October 04, 2008 12:21:43 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Nancy Johnson
3414 42nd Ave W
Seattle, WA 98199

From: Ron Johnson
Sent: Thursday, September 25, 2008 11:47:19 PM
To: Davies, Holly (ECY)
Subject: Use Of Lead Ammunition

Good morning Ms. Davies:

My feeling is that lead ammunition bans are on the minds of many people involved with the CAP project. Page 208 of the CAP states, "Products that do not need lead and directly expose wildlife include wheel weights, small fishing weights, and some ammunition." As an example, in California, hunters were asked to voluntarily use non-lead ammunition in areas occupied by the California condor. Within two years, the request was replaced with a legislative ban on hunters' use of lead ammunition. In Arizona, the same request was made of hunters, but as soon as the California ban was signed into law, lead-ban proponents started their attack in Arizona. A symposium was held in Boise, Idaho on lead ammunition in June at which almost all speakers supported a ban on lead ammunition, regardless of cost, performance, or availability of substitutes. I feel the CAP is a preliminary step that will lead to the promotion of a legislative or regulatory ban on lead ammunition.

Sincerely,

Ron Johnson

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From: samuel johnson
Sent: Friday, September 19, 2008 2:34:38 AM
To: Davies, Holly (ECY)
Subject: Draft Lead CAP

Holly Davies ? Advisory Committe

Lead shot has been banned in waterfowl hunting for many years. But there is no adequate substitute for lead ammunition and the recommended ban is not justified. The affects on humans and wildlife by use of lead in ammunition in our State does not justify this ban.

Thanks for your attention...
Samuel L . Johnson
2346 Lister RD NE
Olympia, Wa. 98506

From: ws johnson
Sent: Saturday, September 20, 2008 3:35:06 AM
To: Davies, Holly (ECY)
Subject: Draft Lead CAP

Dear Holly,

In reading the draft I find some glaring errors. It all sounds nice and supposedly there will be no effect to the hunter or shooter but one thing is missing, cost.

My wife and I do not hunt but try to go to the range and shoot a couple of times a month. During a session we will each shoot 50 rounds each of .38 and .45 pistol rounds and 50 to 100 rounds of .22LR in a pistol and rifle. We are retired (I am 71 she is 66) and we are on a limited income. This bill would effectively make it very difficult to continue what is basically our only outside activity. (Too old to run, bicycle, or climb mountains)

True, there are copper bullets for most calibers but our shooting cost is now \$5.00/100 (I cast and reload to keep our cost affordable). Having to purchase copper bullets will raise the cost to \$82.00/100. (Price is from links in your draft CAP) In other words what we can now do for \$10 to \$15 will go up to \$82 to \$164 per session. This is not acceptable.

Additionally there are NO .22 long rifle all copper bullets even available.

Another thing to consider is that there are hundreds that enjoy "Cowboy shooting" which MANDATE lead bullets.

There is a cost to go "Green" but this is a very poor choice. In the draft CAP it states the environmental lead content has and is fallen dramatically. Why impose draconian laws that will be very costly and achieve little. You do understand that this will create another costly federal/state bureaucracy.

Respectively,

Wilbur Johnson
Anacortes, WA

From: david h jones
Sent: Thursday, October 02, 2008 1:13:09 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

david h H jones
4007 densmore ave n
seattle, WA 98103

(206) 632-2418

From: David Jones
Sent: Thursday, October 02, 2008 12:23:12 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies
Ms. Davies:

Thank you for your leadership as the Department of Ecology considers stronger containment of lead in our environment in Washington State. As a public school administrator every day I see the struggle children with learning disabilities face as they encounter the challenges of school. With the recent linkages between environmental lead and children's learning rates and ceilings, we must take all steps needed to eliminate a child's potential exposure to lead.

I understand that the total elimination of lead from our manufacturing, housing, agricultural and commercial sectors will take strong leadership and commitment, and I thank you for your stewardship of our state's welfare and youth. Every child you protect from the effects of environmental lead is a child better able to benefit from our public school system, and a young adult better prepared to enter our society as a contributing adult. You have in your power the ability to make a significant and lasting positive impact on the future of our state, as well as the opportunity to set an example for the other 49 states in our nation. I assure you that your efforts will be supported by the citizens of Washington.

I encourage you to develop the most effective mix of incentives, scientific monitoring and timelines designed to bring about the rapid and complete elimination of lead in our environment.

I thank you for your leadership and thoughtful consideration of this issue, and for your ethical stewardship for our state's most precious resource, our children.

Sincerely,

David Jones
6311 146th ST SW
Edmonds, WA 98026-3647

(425) 743-2555

From: Don Jones

Sent: Sunday, October 05, 2008 8:23:23 AM

To: Davies, Holly (ECY)

Subject: NO!!! to Department of Ecology Publication No. 08-07-009

Ms Davis,

I find this proposed ban on lead highly objectionable as a hunter. This would create a situation in which effective ammunition for use in big hunting would be non-existent resulting in the senseless wounding and loss of wildlife. The result of this proposal conflicts with sound big game management practices.

Don Jones

Everett, WA

From: Sandra Joos
Sent: Thursday, October 02, 2008 8:22:47 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Sandra Joos
4259 SW patrick Pl
Portland, OR 97239

1 October 2008

Holly Davies
Dept. of Ecology

Dear Holly,

Thank you for the opportunity to comment on the Lead Chemical Action Plan draft document. Overall the content and scope of this effort is excellent. I have divided my comments into two parts, the first being general and the second more specific to error or additions that you need to consider.

1. I strong support Recommendation #9 and the information provided on the use of lead in ammunition and fishing activities. It is a well known fact that lead is toxic to humans and wildlife from these sports. I recently sat at a meeting with an older long-time hunter. He said he has been diagnosed with lead poisoning from his home ammunition reloading including making his own bullets for “cowboy gatherings” using the old west style six shooters. The costs to wildlife are well documented and you have done a good job representing the latest scientific information.

As you know, I support those who want to hunt, shoot and fish. However, I am strongly supporting the use of only non-toxic ammunition and fishing sinkers. Conservation is practiced, not just talked about.

2. The following are specific comments I have about the CAP LAP draft.

Economic Analysis of Lead Exposure
pg 235 Costs to shift to nontoxic ammunition given on

Listed below are some of the errors or additions that you may want to consider in the final draft:

Use words that the average person will know: ductility – great word, but not in general use

pg 20 children exposed via parent/adult activities (watching adult melting lead at home)

pg 48 List swan deaths from lead in WA

pg 49. Lead contaminated fish in Spokane River—what about fish eating birds?

pg 53 lead soil contamination from shooting ranges

pg 56 fix spacing on bullet items

Under Area Wide Soil Contamination: what about casual shooting of target loads over private lands, or public lands where shooting is permitted but unregulated. This issue appears to

not have been addressed, even as a potential problem.

One of the consumer products that appears to have overlooked is the weights for diving where some people cast their own or use large shot, handling it without gloves.

pg 105 Under the discussion of informal or unregulated shooting ranges you need to include private property where someone shoots on their own land. This can be a substantial source of lead that can be hundreds of rounds a year of at least 1 oz/shell. This can be an issue in a flood zone where shells and shot or other ammunition get washed into wetlands and rivers.

pg 106: existing programs

Washington: include that WDFW has a public shooting range at their Vancouver, WA Wildlife Area and it is required to use only non-toxic shot

pg 247 Costs for soil remediation: may include restoration of wetlands or farmlands from lead shot contamination

pg 252 lead shot is not necessarily MUCH cheaper than other metals. Some boxes of steel are nearly the same price. Combined metals are more expensive. Information from Cabella's catalog and other sportsman's outlet pricing has cheaper steel and lead shot more equally matched than people expect.

pg 253 problem with format of page, part of table missing

pg 259 reduce risk measure number of dead swans yearly.
fine if the level of looking remains the same, not likely due to budget cuts

pg 233 (such as use of lead shot for hunting pheasant)

There are states such as Iowa who now have bans or restrictions on lead shot for pheasant hunting because of the harm to other species in the area. WA is now restricting its pheasant release sites, in part because in many cases waterfowl use the dry grain fields for feeding. It is not just about wetlands, but where overlap occurs. This is true in other states as well. Also, mourning doves are now known to be affected by lead.

I sat at a WDFW Waterfowl Advisory Group meeting earlier this year and one of the hunters said that he shoots mourning doves with lead shot—directly over the wetlands near Moses Lake. The fact is, there is science to show that we have problems with use in upland bird hunting. To imply otherwise is extremely misleading.

Please note that lead in hobby: melting own fishing weights or making lead bullets exposes family members to lead

- - - - -

Taking lead out of our lives wherever possible needs to be the focus of all of us. Thank you for your hard work on this document.

Sincerely,

Martha Jordan

From: Jennifer Joseph
Sent: Thursday, October 02, 2008 7:07:56 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

As mother to a 16 month old, I am extremely concerned about the possible presence of lead in common consumer products. I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Jennifer Joseph
6720 34th Pl. S
Seattle , WA 98118

From: sisu suomi

Sent: Sunday, September 21, 2008 5:48:00 AM

To: Davies, Holly (ECY)

Subject: Focus on Lead Ammunition Update on the Lead Chemical Action Plan: Lead Ammunition

Dear Dept. of Ecology,

I'm a biologist and a chemist that taught science and math for 25 years. The lead ban on shot in water fowl areas was a good move by all departments involved but to ban lead from pistols and rifles for target and hunting shooting is totally asinine. The lead shot from a smooth bore gun involves hundreds of small projectiles that can be consumed by fowl where as the lead bullet from a pistol or rifle is too large for consumption and does not disperse through out an extensive area for any animal to consume. This ban is not science it's something else that involves politics and not good science.

Lead is a natural occurring element in the environment that is part of our soil, water etc. tell me how will you control the natural element that abounds in Nature? Go back to science please and leave politics to the politicians.

Thank you,

Scott L. Jouppi

6255 Dayton CT.

Nine Mile Falls, WA 99026

If a nation expects to be ignorant and free, in a state of civilization, it expects what never was and never will be."

--Thomas Jefferson

Invite your mail contacts to join your friends list with Windows Live Spaces. It's easy! [Try it!](#)

From: Fred Jung
Sent: Thursday, September 18, 2008 3:36:43 AM
To: Davies, Holly (ECY)
Subject: Lead Ammunition

To Whom It May Concern,

There is no adequate substitute for lead ammunition and any affects on humans and wildlife do not justify a ban as recommended by the Department of Ecology.

Fred Jung

From: Barbara Jurgens
Sent: Thursday, October 02, 2008 9:13:32 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Barbara Jurgens
13005 NE 71st Street
Kirkland, WA 98033

(425) 827-6229

From: RICHARD JUSTICE

Sent: Sunday, September 28, 2008 9:35:23 AM

To: Davies, Holly (ECY)

Subject:

The banning of lead ammunition in the name of ecology is a blatant discrimination against the hunters and fishermen of this country. Lead has been the projectile of use for more than six hundred years. All of a sudden you and the California media hype have decided it is a dire threat to the country and its wildlife. What a crock. This is a sham! This is a lie. perpetrated by anti hunting associations. It is not supported by any scientific fact what so ever. The giant Condor in California was not proven to be killed specifically by lead poisoning obtained from eating or somehow ingesting lead bullets. Lead is present in old pipes, batteries, and many other products. If you are targeting lead then you need to ban it from every possible thing in this country that might kill a condor. Of course this is not your intention, You only want to target hunters.

From: Jutte, Roger A
Sent: Wednesday, October 01, 2008 11:35:18 PM
To: Davies, Holly (ECY)
Subject: Lead ban

I'm against the proposal to ban lead ammo in Washington state. I don't believe in any poisoning from lead in game animals & the latest study proves this to be true. What I do believe is that this is an attack on lawful hunters & shooters by the anti gun groups.

Thank you.
Roger Jutte
11000 SE 291st ST.
Auburn, WA 98092
253-351-0393

From: Carol Kassner
Sent: Friday, October 03, 2008 5:32:49 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Carol Kassner
506 S.W. 298th Street
Federal Way, WA 98023

From: CHRIS KASTELLA
Sent: Sunday, September 28, 2008 3:31:38 AM
To: Davies, Holly (ECY)
CC: chuck fox; Bob Kadow; ramload@Hotmail.om
Subject: Chemical Action Plan-Lead ammunition

Hello, I was not able to access the plan even though I have the tools. My questions stem from the press release web page.

It is very hard to ascertain any information as there seems to be confusion on the language used to describe the lead in the form it is used in firearms. Lead shot is for shotguns and waterfowl and upland game bird shooting on private lands. Lead bullets are used for recreational shooting at shooting ranges. Copper jacketed bullets are used for hunting in most cases big game or small game. The interchange of these terms in the report make it unclear what is being referred to.

It seems education would be preferable to outright ban.

Is there some form of plan to reduce lead for hunting?

Is there a plan to mandate clean up of certified gun ranges?

How will the state of Washington enforce bans on county or state or national forest lands?

Will there be a fund to help with the pollution clean up similar to the federal "Super Fund" clean up money?

I am not against banning lead shot for hunting waterfowl or upland game birds alternatives are there. Banning lead from bullets used in hunting are no more dangerous then drinking alcohol as the number of shots fired in eh entire state can be measured as a health risk to humans or animals as there is no data on this. Clean up at gun ranges might be a situation that needs to be looked at but then no data is presented to support this on a wide scale in the state of Washington. Several ranges have started this kind of clean up already!

There needs to be a more comprehensive study on the types of ammunition other than lead shot to determine the affects it has on the human and animal population. This should include the many gunranges in the state of Washington and the people exposed to this type of lead contamination before any blanket rules can be placed on lead bullets, bonded bullets, jacketed bullets versus lead shot!

RECEIVED

SEP 26 2008

Sept. 24, 2008

Dept. Of Ecology

Ecology - SWFA - Ind

I just returned from an advisory meeting regarding the Lead Chemical Action Plan being worked on by the Dept. Of Ecology. The meeting seemed to suggest that there is concern of the possible lead poisoning of children in the state of Washington. The latest test was conducted in 1990, which was eighteen years ago. The tests were started in 1970, at which time the acceptable scale was a 10 factor. It was found in 1970 that we were as high as 17, but by 1990 that level had dropped to below 2. Sounds as if the problem has been rectified. The Dept. of Ecology and the Health Dept. want to ban the use of lead in any form. May I remind you that batteries consume Eighty Eight percent of all lead used, leaving Twelve percent for all other purposes, which includes lead for the purpose of shielding for X-rays and medical uses. The idea was to eliminate lead weights and sinkers for fishing and lead bullets for hunting and sport shooting. The main focus was lead bullets, for which there is no adequate substitute at this time, and any affects on humans and wildlife do not justify a ban as proposed by Governor Gregoire's Dept. of Ecology. Think of the impact on the sporting goods industry. It was quite apparent to all of those who attended this meeting, that the real agenda of this study, is to slip in the back door of the gun and arms control and the threat of our second amendment rights. I will be watching you on this issue, and will not continue my support of anyone who wants to ban weapons or ammunition or undermine our constitution. I believe it is sinful to use our children as pons in this political issue. I believe our children are in far greater danger as to drug and substance abuse. What is being done about this ???

Independent Voter
Garry Keevy
2603 S. Monroe
Spokane WA. 99203

From: Cynthia Kelling
Sent: Thursday, October 02, 2008 2:05:42 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Cynthia Kelling
9227 Mary Avenue NW
Seattle, WA 98117

From: Rick Kemman
Sent: Friday, September 19, 2008 9:58:46 PM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

It appears to me that there is no credible information that the public is being exposed to lead at toxic levels. If anything this plan appears to be a way to ban the use of lead ammunition for hunting within the state. Despite what others may say, there is no suitable substitute for lead ammunition and its elimination would severely restrict hunting within the state. Banning lead shot near areas of waterfowl protection is warranted in some cases but an overall ban of lead ammunition is not warranted in the state of Washington. Despite studies that indicate elevated levels of lead in venison and game birds there does not appear to be any evidence that these elevated levels are putting those that ingest the meat of these animals at risk.

In conclusion, banning lead ammunition throughout the state is not warranted and would severely curtail legal hunting by making the cost of ammunition high and the performance of non-lead replacements (especially steel shotshells) poor.

Sincerely,

Rick Kemman

From: conijimk@aol.com
Sent: Monday, October 06, 2008 2:06:18 PM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Dear MS Davies:

I wish you to know that I strongly oppose the Lead Chemical Action Plan. The proposed Lead Chemical Action Plan will violate my Second Amendment rights by prohibiting almost all ammunition. In addition the Lead Chemical Action Plan is a danger to the public safety, as it will stop individuals from being able to practice firing their weapons and stopping them from becoming proficient or from maintaining their proficiency, resulting in a real and present danger to the public safety.

Thank you,

James W. Kennedy
360-826-6912
conijimk@aol.com

McCain or Obama? Stay updated on coverage of the Presidential race while you browse -
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I am totally against the proposed lead ban on hunting in the State of Washington. There is not enough evidence nor proof that lead is having an effect on the animals and humans. However there is proof that the over medication of animals and humans in this State is at an extremely dangerous level. So instead of trying to backdoor gun control, go after doctors for an over medicate approach to good health!

Put me down as one against such stupid ideas.

Sincerely,

Gerald Kern

Maple Falls, Wa 98266

From: Keith Kidwell
Sent: Tuesday, September 23, 2008 11:35:45 PM
To: Davies, Holly (ECY)
Subject: Comments on Lead CAP

To: Advisory Committee, Lead CAP
Washington State Dept of Ecology
From: Keith A. Kidwell
Date: September 23, 2008
RE: Public Comments on Lead CAP

As a dedicated outdoorsman, hunter and fisherman I read with interest the Lead CAP that is in the public comment phase. While I don't dispute that lead is toxic to humans and wildlife, I do take exception to any attempts to completely ban lead shot and bullets in Washington state, because I don't believe that lead shot and bullets and fishing tackle are anywhere near the threat to humans, animals and the environment that other sources of lead are.

The report states that "88% of lead used in the U.S. is for automotive batteries." Would it not be the best use of resources to concentrate lead abatement in automotive batteries than in the comparatively small percentage of lead released by shot, bullets and fishing tackle?

The report also states that "most lead exposure occurs in the workplace." The workplace does not generally include the forests, fields and waterways of the state.

The report says, "our priority is lead exposure in children" which are primarily exposed to lead by most sources _other than_ shot, bullets and fishing tackle.

The report says, "It is difficult to know how important these sources are to overall lead exposure," /these sources/ including fishing tackle, shot and bullets.

Heavy emphasis is placed on studies of lead exposure in the California Condor, which does not range in Washington, and many phrases like "might" or "possibly could" or "perhaps" refer to lead exposure in other birds of prey in Washington. Where is the science to back up these claims?

I would urge careful consideration, further research and detailed study before any recommendations to completely ban lead ammunition and fishing tackle in Washington state are made or any laws or regulations are enacted.

From: Brian Kilroy
Sent: Thursday, October 02, 2008 1:15:14 PM
To: Davies, Holly (ECY)
Subject: Washington State Chemical Action Plan

To Whom It May Concern:

I am against any further attempts to restrict or prohibit the use of lead ammunition. The negative effect due to the use of lead ammo at target ranges is extremely limited while the economic effects are wide ranging.

The potential benefits of a total ban on lead ammunition in the state (in addition to the existing ban on the use of lead ammo for waterfowl hunting) would be very minimal at best due not only to the slow rate of deterioration of solid lead (it takes over a century for lead shot to deteriorate by even 50% because it forms an oxide shield) but also because of the way in which mammals and amphibians metabolize it. The need to prohibit the use of lead ammo for waterfowl hunting has been well documented but this is not true for land based animals.

The use of lead ammunition is already prohibited for use in hunting waterfowl. Virtually every study since 1984 that shows substantial evidence of lead toxicosis is related to the study of waterfowl. Several studies have been conducted in the past 24 years on the effects of lead on the health of small mammals and amphibians as well as one study on raptors (Kestrel hawks) that show little to no ill effects attributable to lead toxicosis. It has been shown repeatedly that in mammals, except in extremely high doses, the toxic effects of lead shot are negated because any lead metabolized is relegated to the long bones of the body (chiefly the femur) and thus biologically inerted. In studies conducted on waterfowl, the negative effects of lead toxicosis were primarily shown to be the result of environmental lead resulting chiefly from smelting and mining not from lead shot.

The amount of land area represented by target ranges state wide is extremely limited, representing approximately 6/100ths of 1% (0.00006) of the land area in Kitsap county alone. The impact on the general environment due to the limited effect of lead toxicosis as described above is insubstantial due to the limited environmental inclusion of solid lead in the food chain (as opposed to mining and smelting influences) and due to the extremely limited geographical exposure.

Brian Kilroy
8030 SE Red Hawk Ln.
Port Orchard, Wa.
1 October 2008

From: Ron Kimmel
Sent: Wednesday, October 01, 2008 4:16:55 AM
To: Davies, Holly (ECY)
Subject: Lead Ammunition Ban

This is a knee jerk reaction to the ban fire arms groups. The amount of ammunition fired during hunting season over the broad expanse of the state of Washington is relatively small. To say that this small amount of lead is dangerous to people and animals is frivolous. How many bullets fired during deer season end up where a bird can ingest them. Very few! Michigan has already done a study on the effects of humans eating meat killed by lead bullets and found the hazard to very low.

I feel strongly that this is an attempt to follow up on the gun ban which was tried and failed.

Ron Kimmel

From: Carl King

Sent: Wednesday, October 01, 2008 7:00:13 PM

To: Davies, Holly (ECY)

Subject: lead ban

Hello,

I just want to say I don't agree with the idea of banning lead. Isn't lead found in the ground? That's sort of like saying you don't like wood, so let's ban trees. Or, you don't like ants, so let's ban them too.

Carl King

From: mathew king
Sent: Thursday, October 02, 2008 10:42:08 AM
To: Davies, Holly (ECY)
Subject: CAP Comment

This proposal is nothing more than a gateway for proponents of lead ammunition bans. Anyone who lives in the same world I do, and pays any degree of attention can see that, political pandering aside, lead ammunition is the only cost effective way for citizens of the United States to exercise their 2nd Amendment rights. If a cheaper, more environmentally friendly solution can be found, than I would be happy to use alternative ammunition; but as a college student who exercises my right to bear arms, it is already too expensive to buy ammunition. If a new material is required by law to replace lead, the price of ammunition will become too great for guns to be practical. This is paramount to a backdoor ban on both guns and ammunition, and I will not stand by and let my rights be taken away.

--

Mathew D. King
Tech Assistant I
Nuclear Radiation Center
Washington State University

"I'm the one that has to die when it's time for me to die, so let me live my life the way I want to" (Jimi Hendrix)

From: Randy King
Sent: Monday, September 29, 2008 2:12:50 PM
To: Davies, Holly (ECY)
Subject: Information about the Lead Chemical Action Plan

Holly,

I would like more information on your proposal to ban lead ammunition. I did read “
The CAP does not include any recommendations to ban or regulate lead in any type of ammunition beyond current law. But that is in effect what this is proposing. Before I start annoying the Governor, legislature, candidates, etc. please provide the following information:

1. “
Scaring animals can be harmed by cutting game that is killed with lead ammunition. Where can I find any information such as ne ropsy reports that support this statement?

2. Non-toxic alternatives to lead ammunition are now available in most places. As a sportsman and competitive shooter, where can I find information on these alternatives? Is the Department of Ecology willing to share expenses arising from the cost of developing, testing and marketing these alternatives? If these alternatives are not effective, must prohibit them not a viable etc. I would expect the game and fish resources to develop them any study on the possible effects that might carry?

3. For example, in 2005 Arizona officials became concerned about the lead poisoning of California condors. Arizona launched a voluntary collaborative education-and-outreach partnership with hunting and shooting groups to reduce the use of lead ammunition in condor areas. Arizona and California only banned lead in Condor areas. Your proposal sounds statewide. Other than the Capital Peak site, where can I find information such as a map that shows ammunition related contaminants and any supporting research?

Thanks
Randy King
Clallam, Washington

From: Susan Kinoshita
Sent: Friday, October 03, 2008 2:46:56 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Susan Kinoshita
1444 NW 197th Street
Shoreline, WA 98177

From: michael kirsch
Sent: Thursday, October 02, 2008 7:10:02 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

michael kirsch
1012 w white rd
spokane, WA 99224

(509) 448-5967

From: Kiser, Rick
Sent: Tuesday, September 23, 2008 2:40:21 AM
To: Davies, Holly (ECY)
Subject: Banning lead in ammunition

I would like to go on record as opposed to banning lead in ammunition. I think the intentions are fine, but since there is no acceptable substitute available, it would rapidly fall victim to the law of unanticipated consequences. I would rather the Department spends its limited funds on a better returns than this. I realize this has more emotional and press visibility than other areas, but you should improve the environment more effectively in less glamorous, but more productive areas. Pardon the pun, but I'd like to see more "bang for the buck" than you will get on this issue.

Respectfully,
Rick Kiser
1745 Hastie Lake Rd
Oak Harbor, WA 98277

From: Jon Klug
Sent: Tuesday, September 30, 2008 10:19:51 AM
To: Davies, Holly (ECY)
Subject: Draft Lead CAP

Dear Ms. Davies:

I was directed to a website, <http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/>, describing the State of Washington's proposal to ban traditional, lead based ammunition used for hunting.

I would like to express my extreme concern for such a law being drafted. Lead consumption from ammunition contributes 1-3% of the reported cases. (<http://www.ila-lead.org/factbook/chapter3.pdf>). Making efforts to eliminate ammunition that contains lead is going to make very little headway in the direction of eliminating lead consumption.

Second, banning lead will increase the cost of producing alternative ammunition. This increase in production cost will be handed down to the consumer. In the economic times we are experiencing, the price of ammunition will play a huge part in whether or not people will hunt in the upcoming seasons. If fewer and fewer people hunt, there will be an increase in game population. With an increase in one particular animal, there will be a decrease of another. With higher population of another animal, the amount of crop damage will increase, as well as *involuntary* human interaction with said animals, car accidents being the first to mind.

Yes, hunting is a sport for people to enjoy, but it is also a means of controlling the population. If there was no relationship between hunting and game population, there would be no lottery each season for licenses. The number of licenses awarded is directly correlated to the population of that particular game the previous year.

I am not a citizen of the great state of Washington, but am concerned about this CAP becoming a law because it could spread quickly throughout our great nation.

Thank you for your time.
Jon Klug

From: raymond I knight
Sent: Thursday, September 18, 2008 7:19:10 AM
To: Davies, Holly (ECY)
Subject: more restrictions

Holly Davies,

I was born in this state 67yrs ago, the last 40 yrs i have watched the steady decline of our state. Washington is now run by Pantheist with more power than the President. If lead is such a problem, why now ? what is the alternative, paint balls !! The Dept of Ecology has more power than congress, why not work on larger problems, like our forest, that will have more effect than lead, oh don't forget Plastics, now there is a problem.!!!!

I invite you to take a drive around Eastern Wa, that will give you a project. Forest Fire will be the next issue.

Government is out of control.

Thanks.

R.L.Knight

From: Mary Koehler
Sent: Thursday, October 02, 2008 7:48:13 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Mary Koehler
2618-221st Avenue NE
Sammamish, WA 98074

From: Stephen Koepp
Sent: Thursday, October 02, 2008 1:04:02 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Stephen Koepp
10621 64th Pl. W.
Mukilteo, WA 98275

From: joyce kormanyos
Sent: Thursday, October 02, 2008 7:13:18 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies
Let's get the lead out!!!!!!!!!!!!!!

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

joyce kormanyos
2048 216th Ave SE
sammamish, WA 98075 7170

(425) 392-4938

From: Stephen Kozar

Sent: Saturday, September 20, 2008 9:39:56 PM

To: Davies, Holly (ECY)

Subject: Lead Proposal

You need to schedule many more public meetings in a wider geographic area across the State
2 is completely insufficient
Thank You

From: B & L Kramer

Sent: Thursday, September 18, 2008 11:24:59 PM

To: Davies, Holly (ECY)

Subject: my comment on your lead ban–Draft Lead Chemical Action Plan

You people are morons. This lead ban is just an attempt at gun control. I know you'll do it anyway. I am just telling you what I think while I still have that right. So put my message in your report. Your idea stinks, go get a real job and quit messing with my ammunition supply. I guess I can always drive up to Metaline Falls and pick it up off the ground if I can't buy it anymore.

Put a check mark in the against box,

Bryant Kramer

Usk, WA

From: Helen Kramer
Sent: Thursday, October 02, 2008 10:37:41 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Helen Kramer
2724 45th Avenue SE
Olympia, WA 98501

(360) 709-9013

From: Ted & Lora Krauss
Sent: Thursday, September 18, 2008 3:13:11 PM
To: Davies, Holly (ECY)
Subject: Proposed Lead Ban

Dear Sirs:

I would like to go on record as opposed to your lead ban proposal. I do not feel that this ban will be useful or helpful for WA residents.

Sincerely,

Theodore M. Krauss
12323 S. Sherman Rd.
Spokane, WA 99224
email: krauss@icehouse.net

From: John
Sent: Wednesday, August 27, 2008 12:10:44 PM
To: Davies, Holly (ECY)
Subject: Lead Action Plan

Mr. Davies

I'm an active shooter and hunter. The lead chemical action plan should not be used to close any shooting range or affect hunting with lead bullets. In 35 years of hunting and shooting I've not seen one case where anyone has been affected or died from using lead bullets. If eating wild game shot with lead projectiles caused lead poisoning I think I would have been affected by now. I hope that the Lead Action Plan will not be used to close shooting ranges or to stop hunting using lead bullets. Thank you for taking the time to read this.

John Kraynak
253-848-5708

From: Elinor Kriegsmann
Sent: Friday, October 03, 2008 1:16:33 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Elinor Kriegsmann
2350 McGilvra Blvd. E
Seattle, WA 98112

(206) 325-7039

From: Melanie Kristoferson
Sent: Thursday, October 02, 2008 1:03:12 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Melanie Kristoferson
4315 SW Oregon St. #203
Suite 540
Seattle, WA 98116

From: Michael Kucher, Ph.D.
Sent: Saturday, October 04, 2008 4:03:53 AM
To: Davies, Holly (ECY)
Subject: Please Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Michael Kucher, Ph.D.
4310 Corliss Ave N
Seattle, WA 98103

(206) 956-4090

From: Prem Kumar
Sent: Thursday, October 02, 2008 11:21:05 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Prem Kumar
1205 Seaton Ct
Suite 540
Montgomery, AL 36116

From: ANIacombe@aol.com
Sent: Sunday, September 21, 2008 3:51:21 PM
To: Davies, Holly (ECY)
Subject: Proposed Lead Ban!

To Whom It May Concern:

I've read the material available regarding the proposed ban on lead based ammunition. I find little that convinces me that the measures proposed are either reasonable or needed.

I will not debate the issue that exposure to lead can be harmful to ones health. But, I'm a Montana miners son. Dad brought the stuff home on his clothes; we kids played in mounds of lead tainted dirt daily; and we sucked surrounding air tainted by the smelter's emissions.

To date, and I'm seventy-one years old, none of my family nor any of my childhood friends have had a medical problem related to lead poisoning.

Further my Uncle provided the opportunity to be an artilleryman. During my nine year experience as a soldier I fired, and played in dirt heavily impacted by divergent ordinance. I am a hunter with almost sixty years experience with firearms. The last thirty years I have hunted exclusively with a muzzle loader. I cast my own bullets.

Given these data you could easily theorize that my demise from lead poisoning is immanent.

But, scientifically speaking, there's nothing in my medical record which indicates that's the case.

Lead is a compound found in some soils throughout the West generally and in Washington specifically. In my opinion, you're not going to successfully remove the element from this state's soil, or for that matter have a major impact on it's appearance in the soil by banning ammunition.

Isn't there more pressing work to be done in the environmental world that to chase the "Lead Goblin?"

Sincerely,

Allen N. LaCombe
E. 11121 18th Av.
Spokane Valley, WA 99206
anlacombe@ aol.com
509-924-6795

Looking for simple solutions to your real-life financial challenges? [Check out WalletPop for the latest news and information, tips and calculators.](#)

Hi Holly,

Congratulations on the draft Lead CAP. It is an excellent document that pulls together a ton of research and represents a lot of good work.

Here are my comments; please note that these do not represent the Thurston County Health Department, only my own views as an Education/Outreach Specialist. These comments have not yet been reviewed by my supervisor or the Health Officer; please do not publish as official comments from the Health Department. I am forwarding them these notes in the hopes they will get a chance to review ASAP.

thanks,
Rachel

Rachel Laderman
Education & Outreach
Thurston County Environmental Health
2000 Lakeridge Dr. SW
Olympia, WA 98502

ladermr@co.thurston.wa.us

(360) 754-4111 ext. 7244

fax (360) 754-2954

Comments on Lead CAP

10-6-08

Rachel Laderman, Education and Outreach Supervisor, Thurston County Public Health and Social Services, Environmental Health Division.

- 1) Building on recommendations #1 and #4: Definitely support the approach of having state (or local) health workers contact people living in the high-risk areas. Suggest designing and evaluating the pilot using social marketing methods, to identify obstacles to voluntary testing – follow up with people who do not take advantage of services to find out why. It could be that approach carries sound of being punitive, too scary, or not concerning them. Lead testing of homes and blood lead levels of course should be free, but state-sponsored remediation may have to be scaled to level of risk and ability to pay. Adults should be tested as well as children because, aside from their own health effects, women pass lead along to children in utero.
- 2) While landlords are supposed to provide information on lead to new tenants, many small landlords do not even know about this rule. Every few months working as a local environmental health educator I get a call from either a renter or a property owner wondering if there is information on lead paint in housing they should know about (I send them the EPA brochure). Somehow using tax records or something we need to figure out a better way to reach small landlords.
- 3) The Children's Safety Act does not protect children as fully as a product ban. After a de minimus amount of lead is determined, ban lead from all items coming into the state, not just in children's products. Follow the Denmark model. For manufacturers still using lead, require product stewardship, and require labeling of products. Items should also be spot-tested at point of production or from store shelves.
- 4) The Okanogan gold mine should not be allowed. Why allow a new source of lead that will pollute groundwater, air and soil when we are scurrying to capture and clean-up the lead already out there?
- 5) Need to revisit the laws around disposal of toys or other household items with lead. Why is it ok for a homeowner with several boxes of lead-contaminated toys to throw these into the local landfill, whereas a small business with the same amount has to bring them to a hazardous waste facility? If HHW even in modern landfills contaminates leachate (p. 8, 73, 77), then HHW should be banned from landfills throughout the state.
- 6) Recommendation #9 – since there are good non-lead alternatives for wheel weights, fishing tackle, and shot, why not ban them, as other states have? Voluntary measures are not likely to succeed, even with lots of free technical assistance, as shown by King County Local Haz Waste Management Program's initially voluntary requirement of dentists to trap mercury from going down the drain – this only became effective when installing traps became mandatory and enforceable. See http://www.newmoa.org/prevention/mercury/conferences/reductions/files/Session2A_AdditionalFiles.pdf

From: brock Laffoon
Sent: Saturday, October 04, 2008 2:33:54 AM
To: Davies, Holly (ECY)
CC: bohannon@sherradlaw.com
Subject:

Concerning the lead ban in fire arms. This ban would make many guns obsolete as older shotguns are unable to use steel shot. This ban would at least double the cost of shooting. I think it might render bullet proof vest obsolete since copper or steel bullets would certinaly pendetrade further lead bullets.

Most gun clubs recycle the lead.

Also we have civil war battlefields that are over 100 years old and the people that live around them have suffered no health problems. This can also be said for military bases.

It seems that the legislature has voted on this matter and decided not to ban lead bullets.

Respectfully

Brock Laffoon

From: tai lahans
Sent: Thursday, October 02, 2008 8:43:34 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead is also a known carcinogen. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and all populations to reflect a goal of zero exposure and help health officials better protect all populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products, using the precautionary principle, and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

tai lahans
1720 1/2 NE 148th St.
Shoreline, WA 98155

(206) 726-0269

From: T. F. Lambert
Sent: Wednesday, September 24, 2008 6:38:14 AM
To: Davies, Holly (ECY)
Subject: Proposed Ban of Lead Ammunition

Dear Ms. Davies,

It is my understanding that the Washington State Department of Ecology is in the process of making lead ammunition a target of a series of recommendations in the "Lead Chemical Action Plan" prepared by the Department of Ecology.

Lead shot is banned for hunting waterfowl by federal law and is banned in many wet land areas as well. That is certainly a good thing.

I am absolutely opposed to the banning of lead ammunition across the state. There are a number of issues involved.

First, lead is the only economically feasible metal for large scale shooting at target ranges, etc. Steel and other metals are far too expensive for an afternoon of shooting.

Second, many older, and sometimes high value firearms are not safe to use with steel and other type of hard metal shot. Other types of shot that are compatible with these firearms is excessively expensive. Tungsten matrix loads for a 12 gauge shotgun are \$4.00 per round....not per box. The average shooter cannot afford this kind of price. The average shooter will have difficulty funding a new shotgun in these financially trying times.

Third, this seems to be more of an assault of 2nd amendment rights than public safety. Members of my family have been eating game birds and animals for several generations and there have been no indications of issues with lead consumption. I personally have eaten game birds and animals for nearly 60 years with no ill effects.

Thank you for the opportunity to make comments on this proposed action.

Thanks and best regards,

T.F. Lambert

From: kevin lampshare
Sent: Thursday, September 18, 2008 1:44:13 PM
To: Davies, Holly (ECY)
Subject: lead ammunition

Did you notice in your links to articles about lead not one of them was about lead ammunition? theorys and hypothesis are not enough to ban items and make government restrictions more of a burden.! Kevin Lampshire

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From: Greg Lane

Sent: Thursday, September 18, 2008 9:49:09 AM

To: Davies, Holly (ECY)

CC: Dan and Teresa Leslie; Gil Hughes; Henry L Hooker; Jim and Hope Jennings; John Casillas; Ken Sorensen; Jeff Lane; Dan Monson; Paul Allen; Tommy and Lynn Parrish; Kayleen Conner; Doc and Judy; Michelle Cota; danointhenw@centurytel.net

Subject: Draft Lead Chemical Action Plan

To Holly Davies,

I want to voice my opinion on the Draft Lead Chemical Action Plan. In reality the affects on the environment are so minimal if there are any at all it is not worth the financial impact on legal businesses or people who have purchased ammo and what's more have already paid a state tax on it when it was purchased. Since there is no suitable replacement for lead ammo, this is just another attack on our 2nd Amendment rights and law abiding gun owners who enjoy hunting or just target shooting. To make the use or even possession of lead ammo a crime is truly an attack on people who already own ammo and enjoy the sport of hunting or target shooting.

I am not a hunter but I enjoy the sport of target shooting with my friends and family. This is part of our heritage and is our *right* to do so. Please do not go forward with this horrible plan that would destroy one of the great freedoms that we enjoy. If we dismiss one of the most important rights given to us by our forefathers, the one that protects our country and family, who is to say what freedom would be next if someone doesn't like something about your religion or even your right to speak what you want. Tampering with *any* of our rights is a slippery slope and once begun is hard to reverse. The underlying motive of anyone who thinks lightly of hurting any of our rights and especially the 2nd Amendment *should* and *will be* examined by free loving people of this state now and future generations.

Regards,

Greg Lane

Duvall, Washington

From: George Lanphere
Sent: Friday, September 26, 2008 12:10:48 AM
To: Davies, Holly (ECY)
Subject: Lead ammunition

Banning lead ammunition is not necessary. The small amount of lead contamination in the "woods" has to be very small as most bullets end up deeply imbedded in an animal or in a tree or other obstruction.

Due to poor management the number of huntable animals has greatly reduced in the last 20 years, as a result the number of hunters and the amount of ammunition being shot has also reduced. So how could there be a problem.

www.grlanphere@msn.com

From: R A Larson
Sent: Thursday, October 02, 2008 9:21:53 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

R A Larson
109 South 27th Street
Mount Vernon, WA 98274

From: JEFF LAYMAN
Sent: Thursday, September 25, 2008 10:29:51 PM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Re; Department of Ecology, State of Washington-Lead Chemical Action Plan

I applaud the Department of Ecology for wanting to remove serious threats of Lead Poisoning from our lives. The key words being "Serious Threats".
Using a Blanket Plan to include lead ammunition along with lead-based paint and toys is not based on "True Threat" but as I see it, just another misguided attempt to ban hunting.

According to an article published in American Hunter (July 2008)-The Iowa State Health Department has tested 500,000 Iowans under 6 years old for lead poisoning since 1992 (that's 70 percent of all Iowans born after 1986). Also, 25,000 adults have been tested, and there's never been a single case of lead poisoning from wild game.
Nearly all the Iowa children who tested positive for lead had come into contact with lead-based paint, which can contain up to 500,000 parts per million of lead.
On the National level, doctors are required to report all cases of lead poisoning to the Center for Disease Control (CDC), and, according to Kimball Credle CDC public health advisor, No cases have ever been traced to wild game.

This would indicate to me, that there is no serious public health threat from wild game harvested with lead ammunition, and according to the Department of Ecology's Publication Summary published Sept 2008-placing lead ammunition on their list of "the worst of the worst" is misleading

According to the Department of Ecology, there is also concern for scavenging animals that may be harmed by eating game that is harvested with lead ammunition. The area of hunting that had a chance for losing shot game, thus leaving it to be consumed by other animals (waterfowl hunting) has already addressed this concern. As for big game hunting with lead ammunition, the number of animals lost by hunters is minimal; the number of scavenging animals harmed by lead would be incredibly scarce. In order to harvest game humanly a bullet must be able to expand, lead is the medium which allows this to happen. I see no data that supports lead ammunition as a health hazard.

The Department of Ecology, states that testing at a gravel quarry showed lead levels of up to 55,500 PPM. An alarming number I agree, however it is also misleading. I don't eat or hunt in a gravel pit. If your concern is to clean up these unauthorized shooting areas, then confine your efforts to them. I doubt you would find lead levels anywhere near the State Standard of 250 PPM by testing the Game Management Units, (GMUs), where hunting takes place.

I urge you to remove "lead ammunition" from the Department of Ecology "CAP" plan.

JEFF LAYMAN

Marysville, Wa.

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From: [shirley koning](#)
To: [Davies, Holly \(ECY\):](#)
Subject: Lead Ammunition Ban
Date: Monday, October 06, 2008 1:14:24 PM

Governor Gregoire,

In regards to the Department of Ecology; there is no adequate substitution for lead ammunition and any affects on humans and wildlife does not justify a ban. Please vote against this bill.

Sincerely,
Bruce and Shirley Koining

unibrow44@msn.com

Stay up to date on your PC, the Web, and your mobile phone with Windows Live.
[See Now](#)

From: Tomgschiel@aol.com
To: [Davies, Holly \(ECY\);](#)
Subject: Lead ammunition
Date: Monday, October 06, 2008 9:59:48 PM

I am against the banning of lead ammunition or the banning of lead in ammo.
Sincerely, Tom

New **MapQuest Local** shows what's happening at your destination. Dining, Movies, Events, News & more. [Try it out!](#)

From: [Leo Beer](#)
To: [Davies, Holly \(ECY\):](#)
Subject: Lead Chemical Action Plan
Date: Monday, October 06, 2008 10:30:32 PM

I see no reason for this action. It's a solution waiting for a problem.

Solid lead isn't a problem. It's actually pretty stable. Problems occur when lead is in a liquid or gas. Tetraethyl lead was a problem. Actually the priming compound (lead stiphnate) is more of a hazard than the bullet, but it dissipates quickly. Modern indoor shooting ranges take great pains to control ventilation and residue. The bullet is less of an issue.

For hunting it's less of a problem. Most meat where the bullet passes is trimmed because the meat is "blood shot". I have occasionally bitten into a lead or copper fragment eating wild game, but it's only rarely and easy to spit out. My blood levels are fine. Modern bullets hold together much better are more likely to be found either under the opposite hide or completely exited. The likelihood of finding lead in gut piles is reduced as well, though solid lead will pass though a digestive system of a carnivore and not harm them.

In short, this plan is not necessary and I don't support it. I feel it unnecessarily scares people into being paranoid about lead. There is no sound reason for this. We should avoid lead vapors for sure, but solid lead is stable and not a health hazard. We have had electronics around for decades with lead solder, yet how many have elevated lead levels in their blood?

Leo J. Beer
20343 Robin Lane NE
Suquamish, WA 98392

From: [Scott Creek \(Corporate\)](#)
To: [Davies, Holly \(ECY\):](#)
Subject: Lead Shot
Date: Monday, October 06, 2008 4:37:15 PM

Dear Holly

I understand the effort to move to a different type of shot other than lead. However, the economic cost of non-toxic shot vs. lead is huge. Currently I pay about \$6.00 per box of 25 lead shot shells. If I want to buy non-toxic it is \$24.00 per box of 10 for comparable shot, ballistic-wise. So comparing that the cost per shell difference is:

$\$6.00/25 = \0.24 per shell

$\$24.00/10 = \2.40 per shell

Given the numbers of shells shot in Washington as estimated by the WDFW about 3,008,000 shells (based on 1oz. per shell) per year. The overall impact to the Washington Licensed Sportsmen would be as follows:

$3,008,000 \times .24 = \$721,920.00$

$3,008,000 \times 2.40 = \$7,219,200.00$

\$6,497,280.00 Difference ! ! !

This is a 1000% increase in the cost per shell ! !

Now, this is my indepenant approach and compared to your numbers, less than half.

I seriously doubt that the total numbers of lead shot shells expended per year as estimated by the WDFW is that much, but, if it is, this is a huge cost for a change to lead shot.

There was a similar national effort that moved to non-toxic for waterfowl and I understand. However, until a shell is manufactured with similar characteristics to lead at an affordable price, local efforts should cease until a more affordable shell is produced. Maybe the State can create a tax incentive to non-toxic shell manufacturers to make a comparable load at a comparable price and allow their industry to convert to the safer metals and retrofit their manufacturng facilities to accomodate the change.

I really think the numbers in the States estimate should be re-evaluated also. The effects that are stated in the CAP as it affects wildlife and or humans does

not justify making this change.

If this effort was allowed to pass in its present form, the hunters in this State would be severely affected. This should be put on hold at this time.

Thank you for your consideration.

Scott Creek

From: [Paul Bergman](#)
To: [Davies, Holly \(ECY\):](#)
Subject: Lead Shot
Date: Monday, October 06, 2008 5:24:21 PM

Hi Holly,

While lead is a continuing problem in our environment, the use for bird hunting could be eliminated; we need to become better shots, anyway! However, the use for big game (not varmint hunting) would be a huge error. Most of these rounds can be totally encased (as many range rounds are now required) and few ever reach the environment because of the small number that are misses in hunting. I'm am not a big game hunter, by the way.

The largest volume of lead rounds, whether rifle or shotgun, are used at ranges. This lead is recoverable, and now often is, as the price of lead and copper continues to rise. Rifle bullets are recoverable from the ground or indoors barriers, as are pistol rounds.

Shotgun bb's are 'harvested' from ranges as well and can easily be contained by perimeter barriers to contain the distance travelled as they lose their energy rather quickly at about 80 yards. A fence or even heavy tarp would stop most of these bb's and make them easily recoverable. Shorter distances are recoverable by stripping the turf (just like the grass/turf producers do for lawn grass), breaking in down, then putting it through a process much like a sluice box for gold mining. This technology is already being used. Also, surface barriers can be used as most is shot into the air with very limited distance accomplished or covered down range.

A study could be done on the ranges by the NRA, ATA or PITA that would show most, if not all the bullets and bb's are recoverable. I'm sure that this could be done without costing the government much other than time reading the reports. Continued use of lead in rounds used for practice or competition on ranges would greatly reduce the cost to these sportsman and also enhance our recycling efforts for all metals.

A bigger threat is the amount of lead being used in products produced abroad for our use. We have seen many toys with lead paint, but also metallic products that are cast and crafted have ratios of lead to make them easily formed. These are handled by our children, as well as adults. When these are no longer used they go into our garbage.

What about the military? Fort Lewis and the Yakima range have to be big on the list of sites contaminated by lead. Do they also have to change if the law changes? If not, why not? What about the law enforcement

agencies?

What about the Native American reservations? Will this also apply to this population or do they circumvent this like everything else?

The preponderance of lead in our environment is from almost 80 years of use in fuel and that deposited in garbage. Do we now go back and dig up those areas and remove the lead and other contaminants? We have seemed to say, just dilute the contaminants with lots of other garbage and now it is no longer in a saturation range that makes it onto the ppm list of contamination. My friend, an environmental engineer in Montana, told me that the government's solution for contaminated waste is dilution. It does not change it as a contaminant, only dilutes it enough to take it off the list since the ppm's get so low per tonage that it is no longer 'contaminated waste'. The same or more contaminants are allowed to enter the environment anyway! That is the real culprit of pollution in the state.

Do I feel that the lead in our shot should be eliminated? NO! It is a very small part of the issue. Clean the big polluters up first and then go after the small ones. We know that bottom feeders, like waterfowl, may ingest some lead, but they also ingest lots of other contaminants with the mud that they take up indiscriminately and that has been there far longer than the lead pellets and continues with our waste run-off and ground water.

In California this is just a political issue and there is no evidence that lead from bullets has caused any problem with condors. Let's not get to where California is with their firearm issues. That is so misguided and reflects on how fanatical there state has become. Part of this issue is that lead bullets can't be marked permanently due to deformation upon firing. "We must be able to identify where the bullets come from for each firearm used in a crime." That is the marking technology put into law in California. Do they really think that criminals are not going to defeat that mechanism in their illegally or legally procured firearms? This is not a real issue here in Washington, or shouldn't be anywhere, but one that is promoted by big political lobbyists.

I am a regular shotgun shooter at ranges, both public and private. I have been a hunter for a few years growing up and now have returned to that recently. I am a professional and could afford more expensive ammunition for hunting, but not for all the target use I do (approx 1000+ rounds per month). The more targets I break make me a better shot for hunting birds, so I can see that is cost effective for me to switch to other shot for hunting.

While target shells are not cheap (reloads at about \$5.00 per 25 shells

or \$7.00 for new retail), the substitute for non-lead can be three to five times more expensive. This is for either target or field use, it is still going to be cost prohibitive for many individuals in one of our great sports.

The pollution and waste of all kinds from hundreds of thousands of fans going to ball games of all kinds in every neighborhood and city in Washington every week far exceeds that which a small amount of lead from hunting big game is going to contribute over hundreds of years. Are we going to change how much garbage is allowed to come out our sports venues?

One of my best friends is the manager of the five county area in NW Washington. There is no abuse of lead in waterfowl hunting, according to his checking of many hunters over the years.

Thank you for your time.

Paul Bergman, DDS
120 West Fairhaven Ave
Burlington, WA 98233
360-391-3016

From: Erik Lease
Sent: Sunday, September 21, 2008 2:55:08 AM
To: Davies, Holly (ECY)
Subject: Draft Lead CAP

Ms. Davis:

I would like to submit my comments on the Draft Lead CAP as it pertains to lead ammunition.

- I believe that the exposure to humans and other animals as a result of spent ammunition is minuscule, if that.
- There is no useable substitute products to replace lead based projectiles. Rimfire ammunition is entirely manufactured from lead. Washington State law requires Muzzleloader hunters to use a lead bullet (Wa DFW 2008 Hunting regs, Page 58 - Section 2, Paragraphs (b & c)).
- If there are any substitutes, to these products I probably could not afford them, they would not work well and are totally unnecessary.
- The existing regulations with regards to shooting ranges are forcing designated clubs to shutdown or new areas not to be built, this causes the public to shoot in areas where it is un-controlled and any lead recovery is certainly not done.
- I believe that that Draft CAP is another example of legislators looking to 'harvest the low hanging fruit' instead of doing something that makes sense. How many MILLIONS of alkaline batteries are sold in this state and are thrown away. If you are going to restrict lead bullets - don't forget about the lead sinker that my 6 year old uses at the trout pond. Maybe we can tie a rock to his fishing line.
- Leave the absurd policies in California - we don't want them here, not to we want Politicians that support them!

Erik C. Lease
Longview, WASHINGTON

From: John H. Lecky, M.D.
Sent: Friday, September 19, 2008 2:40:46 AM
To: Davies, Holly (ECY)
CC: lmlecky@yahoo.com
Subject: RE: Lead Ban (fwd)

Holly,

I believe that we are on the same page. I also sympathize with you as you are often "just the messenger." You do a good job, by the way, and I appreciate it.

Lead, children and other high exposure groups present a problem. I hope that with your current efforts and other country issues we learn to stratify risk. That would go hand-in-hand with fiscal responsibility or not "driving a tack with a three pound hammer".

Regards, John

On Thu, 18 Sep 2008, Davies, Holly (ECY) wrote:

> John,
>
> I will admit that I am very data driven and somewhat dismayed when other
> people are not. One main point of the CAP is that people get lead from
> many different sources. Different sources are more important for some
> people than others, and different sources are easier or harder to
> reduce. Our priority is lead-based paint, since that is the largest
> single source of lead for children and it is such a widespread source.
> Almost 60% of the houses in Washington were built before the federal
> limit on lead paint in 1978. Another source, which is less widespread,
> is traditional remedies. We want to work at lowering all the exposures
> of lead that we can. The new federal law further limiting the amount of
> lead in children's products is a good step. Our original recommendations
> included that, but we took them out after the Washington law was passed
> in the spring (the federal law has preempted the Washington law to an
> unknown degree).
>
> Part of the problem with lead is that we use so much. Most of it stays
> put, but it doesn't take much to harm a child. It is also hard to
> explain environmental health and population comparisons. We are
> fortunate that we don't see as much damage from lead as we used to.
> People don't notice a loss of a few IQ points, but there is a measurable
> loss across a population.
>
> In my personal email I get messages from groups that I basically agree
> with, but their use of flawed data and how they spin things often turns
> me off. I wish legislators were immune to this.

>
 > Regards,
 > Holly
 >
 > -----Original Message-----
 > From: John H. Lecky, M.D. [mailto:lecky@u.washington.edu]
 > Sent: Thursday, September 18, 2008 9:46 AM
 > To: Davies, Holly (ECY)
 > Cc: lmlecky@yahoo.com
 > Subject: RE: Lead Ban (fwd)
 >
 > Holly,
 > Thank you for your reply.
 > Forgive me if I seem critical of CAP kinds of communications. I am a
 > physician, a scientist as well as a shooter.
 >
 > Lead in certain situations and environments is toxic, no argument.
 >
 > Sadly, the vast majority of people reading the lead CAP are not critical
 > of the data (indeed, all the data are not presented)so they conclude
 > that all forms of lead are uniformly deadly and so the thought process
 > goes on and the conclusions are solidified.
 >
 > As we see daily, such flawed conclusions are then easy for special
 > interest groups to rally around and perpetrate. One only has to see the
 > political spins each night by both parties to become somewhat jaded by
 > the use (or misuse of) partial truths, flawed data, etc.
 >
 > We won't get into politics and I'm sure by the sincerity of your
 > responses that you are trying to do the right thing.
 >
 > My concern remains, however, that few public comments on a CAP are data
 > - driven and that multiple emotion - driven comments about an issue
 > like lead will end up justifying some action that is the popular one,
 > not the rational one. Taken to it's extreme, it will be an expensive one
 > also.
 >
 > Kind of like politicians making decisions or statements based on what
 > pollsters report, rather than what they know is right for the country.
 >
 > I hope that my thoughts will be heard.
 >
 > Best regards,
 >
 > John H. Lecky, M.D.
 > Emeritus Professor

> University of Washington
>
>
> On Wed, 17 Sep 2008, Davies, Holly (ECY) wrote:
>
>> John,
>>
>> Thank you for re-sending in your comments. I sent the ammunition fact
>> sheet in my first reply, but I would like to restate that there is no
>> proposed ban on lead ammunition in the Draft Lead CAP. We would like
> to
>> work with hunters and shooters to promote non-toxic alternatives to
> lead
>> without negatively affecting hunting or shooting areas. As you
> mention,
>> good practices at shooting ranges are a good option.
>>
>>
>> Sincerely,
>> Holly
>>
>> Holly Davies, PhD
>> Chemical Action Plan Developer
>> SWFAP/ Industrial
>> WA Department of Ecology
>> PO Box 47600
>> Olympia, WA 98504-7600
>> Phone: 360.407.7398
>> Fax: 360.407.6102
>>
>> -----Original Message-----
>> From: John H. Lecky, M.D. [mailto:lecky@u.washington.edu]
>> Sent: Wednesday, September 17, 2008 1:44 PM
>> To: Davies, Holly (ECY)
>> Cc: lmlecky@yahoo.com
>> Subject: Lead Ban (fwd)
>>
>> Holly, this is the earlier e-mail I sent to you.
>> I hope this one arrives from the vagaries of cyberspace.
>>
>> Regards,
>> John H. Lecky, M.D.
>>
>> ----- Forwarded message -----
>> Date: Wed, 17 Sep 2008 12:21:41 -0700 (PDT)
>> From: "John H. Lecky, M.D." <lecky@u.washington.edu>

>> To: hdav461@ecy.wa.gov
>> Cc: lmlecky@yahoo.com
>> Subject: Lead Ban
>>
>>
>> Dear Holly,
>>
>> The proposed ban on lead bullets is ill conceived. One may make the
> case
>> for
>> the dangers to water wildfowl from ingestion of lead shot.
>>
>> Indoor ranges have ventilation systems that minimize lead exposure to
>> shooters.
>>
>> Outdoor ranges pose little threat of inhalation or ingestion to either
>> humans
>> or wildlife. In fact, an increasing number of ranges "mine" lead
>> projectiles
>> and recycle them to help support the range expenses.
>>
>> Hunting bullets are for the most part copper jacketed, so the lead
> core
>> is not
>> an issue.
>>
>> Absent hard data, it would be inconceivable that such a proposal
> should
>> even
>> see the light of day.
>>
>> I trust that scientific data rather than emotional thinking will guide
>> our path
>> on this matter (as well as many other issues).
>>
>> Thank you,
>>
>> John H. Lecky, M.D.
>>
>>
>>
>>
>>
>>
>>
>>
>>

From: John H. Lecky, M.D.
Sent: Thursday, September 18, 2008 4:21:41 AM
To: Davies, Holly (ECY)
CC: lmlecky@yahoo.com
Subject: Lead Ban

Dear Holly,

The proposed ban on lead bullets is ill conceived. One may make the case for the dangers to water wildfowl from ingestion of lead shot.

Indoor ranges have ventilation systems that minimize lead exposure to shooters.

Outdoor ranges pose little threat of inhalation or ingestion to either humans or wildlife. In fact, an increasing number of ranges "mine" lead projectiles and recycle them to help support the range expenses.

Hunting bullets are for the most part copper jacketed, so the lead core is not an issue.

Absent hard data, it would be inconceivable that such a proposal should even see the light of day.

I trust that scientific data rather than emotional thinking will guide our path on this matter (as well as many other issues).

Thank you,

John H. Lecky, M.D.

From: John H. Lecky, M.D.
Sent: Thursday, September 18, 2008 4:52:54 AM
To: Davies, Holly (ECY)
CC: lmlecky@yahoo.com
Subject: Additional comments on lead ban

Dear Holly,

Upon further reflection, I would like to point out that millions of existing loaded lead rounds would now be unusable. The cost to many taxpayers would be enormous. What are they to do with "unsafe lead" that is now also a HAZMET issue. Are you going to provide proper disposal sites for them. Who is going to pay for them?

Additionally, the cost(or revenue lost) to small businesses that sell lead ammunition would be enormous. They can't return their inventory, the cost would be prohibitive and the manufacturers probably would not accept it.

More importantly, the National Guard, Military , Police and others who are required to practice their skills, often use lead as it is the most cost effective ammunition to use. Do we ask them to lose their skills. Do we require them to spend 2 to three times the money on their practice with non -lead substitute ammunition?

All for a cause which is seriously lacking in support data.

Regards,

John H. Lecky, M.D.

From: Greg Lehman

Sent: Wednesday, October 01, 2008 2:07:29 AM

To: Davies, Holly (ECY)

Subject: lead bullet ban

Dear Sirs;

This bill is totally wrong and needs to be dismissed immediately. The US constitution , 2nd ammendment provides for all citizens the rirht to bear arms. You're trying to make it difficult for the gunowner to have guns. There are no substantiated proof that lead bullets has ever caused harm to youth, and /or adults.

Please throw this bill out for good and protect gun owners and American citizens rights for a change!

Sincerely

Greg Lehman

Chelan county, Wa.

From: Lemieux, Fran
Sent: Friday, September 19, 2008 3:38:40 AM
To: Davies, Holly (ECY); Chadwick Markel; Steve Prentice
CC: victorvjohanson@yahoo.com; Dave Abbott
Subject: RE: Lead Ban in Ammunition

Thank you for your quick response. I will review

Fran Lemieux
Department Manager
Nuclear Engineering
Integration/Compliance
702-295-0737
702-335-9567 Cell

From: Davies, Holly (ECY) [mailto:hdav461@ECY.WA.GOV]
Sent: Thursday, September 18, 2008 11:19 AM
To: Chadwick Markel; Steve Prentice
Cc: victorvjohanson@yahoo.com; Dave Abbott; Lemieux, Fran
Subject: RE: Lead Ban in Ammunition

Thank you for sending in your comments on the Draft Lead CAP. There is no proposed ban on lead ammunition in the Draft Lead CAP. We would like to work with hunters and shooters to promote non-toxic alternatives to lead without negatively affecting hunting or shooting areas.

Please take a look at the focus sheet we prepared about lead ammunition and the Draft Lead CAP. I've attached the fact sheet to this email or you can access it at:

<http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/>

Sincerely,

Holly Davies, PhD
Chemical Action Plan Developer
SWFAP/ Industrial
WA Department of Ecology
PO Box 47600
Olympia, WA 98504-7600
Phone: 360.407.7398
Fax: 360.407.6102

From: Chadwick Markel [mailto:chad_markel@yahoo.com]
Sent: Thursday, September 18, 2008 11:15 AM
To: Steve Prentice; Davies, Holly (ECY)
Cc: victorvjohanson@yahoo.com; Dave Abbott; Lemieux, Fran
Subject: Re: Lead Ban in Ammunition

I concur.

Chadwick G. Markel
8911 W. Grandridge Blvd.
Suite C.
Kennewick, WA 99336
(509) 947-5590 - cell #

----- Original Message -----

From: Steve Prentice <stevep@propertygems.com>

To: hdav461@ecy.wa.gov

Cc: victorvjohanson@yahoo.com; Chadwick Markel <chad_markel@yahoo.com>; Dave Abbott
<shaksper@urx.com>; "Lemieux, Fran" <LEMIEUFH@nv.doe.gov>

Sent: Thursday, September 18, 2008 10:41:52 AM

Subject: Lead Ban in Ammunition

Dear Ms. Davies;

I am writing you to voice my opposition to banning lead ammunition. There is no Scientific evidence that lead based ammunition is a the culprit of lead toxicity to the public or anything else. Lead is a natural element. Poisoning is based on constant exposure at high levels over an extended period of time and that source can be scientifically traced. i.e. lead based paints, lead in solder used in plumbing/construction, fumes from smelters, mining operations and inadequate disposal of wastes from industrial sources

The banning of lead based shot from waterfowl hunting was based on shoddy scientific methodology, documentation and assumptions.

I urge you to stay with the facts not some other hidden agenda.

Sincerely;

Steve Prentice
29707 So. 959. PRSE
Kennewick, WA 99338
509.627.2880 eves
509.948.0266 daytime

From: Larry Leone
Sent: Thursday, October 02, 2008 1:37:57 PM
To: Davies, Holly (ECY)
Subject: Lead CAP

Ms. Holly Davies,

I recently learned of the Lead CAP program currently posted for public review. As a strong proponent of the 2nd ammendment for self defense and sport, I am pleased to see the attention to ammunition. The alternatives to lead bullets presented include two rifle bullets where solid copper or copper jacketed tungsten bullets. Currently both alternatives are very expensive compared to the lead-core bullets. These alternatives also wear rifled barrels more rapidly as the "engraving force" is higher than lead-core bullets.

My fear is that while the CAP does not specifically seek to ban ammunition, it may be a back-door means for our democratic politicians to do just that. A quick check on solid copper handgun bullets (.40 S&W 155 grain) reveals pricing at \$0.85 per bullet. The last time I bought bullets I paid \$0.06 each (.40 S&W 180 grain). A price hike by a factor of 14 would make many shooting sports cost prohibative.

Just a couple of quick notes.

As a competitive shooter and reloader, I've had my lead levels checked and I'm no worse off than someone not involved with shooting. The NRA recently provided a grant for a local club (Custer Sportsmen's Club) to clean up their range by "mining the berms". I don't know any more details than that, but I would imagine they recycled many tons of lead.

I'm a Mining Engineer and my wife is an Environmental Geologist. I understand that lead in soil is highly immobile and minimally soluble. I understand there are many sources of lead in our environment that are more prolific and accessible to children than ammunition.

I appreciate the clean environment here in western Washington. I do not intend to sound hostile. We all have a job to do and I feel like I needed to have my voice heard.

Thank you,
Larry Leone

From: Peggy Leviton
Sent: Thursday, October 02, 2008 12:52:09 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Peggy Leviton
PO Box 2503
Bellingham, WA 98227

(360) 756-1905

From: Ken Lewis
Sent: Tuesday, September 30, 2008 8:06:04 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Dr. Davies,

You will be overloaded in the next few days, so let me begin with some encouragement. Hang in there.

I have only looked at the Executive Summary at this point and it reads redundant to document already produced by ITRC and EPA. I am interested in the report feedback. I am one of many working to keep our firing ranges safe and responsible on every level. I primarily use ITRC and EPA documents for guidance and sourcing. I learned to contain and control leaded areas. If your report actually cite something new, please point it out. Whereas, lead is a naturally occurring element, and we have used lead for about 6,000 years, there are many lessons learned and new applications. I believe it will be difficult to eliminate it; like alcohol and cigarette smoking.

I will continue to review the finding and recommendations. No doubt, the outdoor sports industry will see this as an out right frontal attack. Will there be a move in the future to go after every category cited in the report?

“Lead is released into the environment by such large sources as **industrial facilities** and **sewage treatment plants**, as well as non-point sources, such as some **airplane fuel**, *ammunition*, and **other consumer products**. The largest industrial releases of lead in Washington are from mining, the Hanford Nuclear Reservation, military bases, and large energy users such as pulp and paper mills and concrete manufacturers.”

I look forward to your findings. It is very important I do what I do right. If I may be of service, please let me know.

Thank you,

KEN LEWIS
Range Master / Instructor
Training / Range Consultant
San Antonio, Texas
kenlewis@satx.rr.com
210/256-9627-Phone
210/663-4047-Cell

National Protective Services Training School
NRA Range Development and Operations Conference

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Hi Vickie:

Hope you are having a good morning. We received this email from a constituent regarding DOE's Lead Chemical Action Plan and he disputes some of the findings. Do you have any suggestions on how to respond to Mr. Lewis?

Thank you,
Ann

Ann Seabott
Legislative Assistant to
Rep. Hans Dunshee

44th Legislative District
District: (425) 257-1770

2812 Lombard Suite 303
Everett, WA 98201

-----Original Message-----

From: roper1952@comcast.net [mailto:roper1952@comcast.net]
Sent: Tuesday, September 09, 2008 7:59 AM
To: Dunshee, Rep. Hans
Subject: Dept. of Ecology lead plan

HOUSE INTERNET E-MAIL DELIVERY SERVICE

TO: Representative Hans Dunshee

FROM: Richard Lewis

STREET ADDRESS:
3309 108th St. SE
Everett, WA 98208

E-MAIL: Roper1952@comcast.net

PHONE: (425) 338 - 0910

SUBJECT: Dept. of Ecology lead plan

MESSAGE:

I have just finished reading the Department of Ecology's Lead Chemical Action Plan (<http://www.ecy.wa.gov/pubs/0807009.pdf>). Starting on page 98 it addresses their opinion of the lead issue in Washington. In the plan it states "Most ammunition now comes in non-lead versions..." What they left out is that rifle and handgun ammunition does not have non-lead versions. They also left out that what non-lead choices exist are extremely expensive. Your average lead shot shell cost about 40 cents. Your average non-lead shot shell costs close to 3 dollars! Non-lead shot is just as expensive making reloading no longer and option to keep costs down. Economic impact is totally lacking from the Departments plan.

So if you add this cost to an already stressed economy, one can easily see sport shooting of all types declining if not vanishing all together. Gun ranges will likely close, trap and rifle ranges, gun shops, and fishing stores will be impacted also. Then there is the ripple effect to manufactures and retailers of all types of equipment, clothing, boots, optics, etc. Let's not forget lodges and destination lodging for hunters across the state. And last but not least the revenues from licenses and ammo sales. Jerry's Sporting Goods just began their closing sales a few months ago; they have been in Everett for over 40 years.

Sportsman Warehouse in Mt. Vernon will be impacted, as will Cabela's in Lacey. There are numerous gun shops, Sams, Adventure Sports, and ranges like Marysville Rifle club, Kenmore Range, Granite Falls, and others.

The revenues from these will be gone and little will replace them. So compare that impact to the state against the vague "science" noted in the plan. It speaks of "a potential source of lead exposure..." or data on condors even though we don't have condors. Where is the data on numbers of a species declining directly related to lead? What species has been brought to the brink by lead? If ground lead is such an issue, why hasn't lead from the Civil War leached into the ground and poisoned most of the Eastern Seaboard States? That's because lead bullets do not dissolve into the ground and pollute ground water. This whole plan may be all nice and warm and fuzzy and politically correct, until the economic impact hits home. By then it will be too late and the sport shooting and hunting life will be gone from Washington.

Please consider these issues and take what action is required to preserve our sporting heritage in this state.

NOTE: We are 99% sure that this constituent is in your district

RESPONSE REQUESTED: Richard has requested a response to this message.

From: Sarah Leyrer
Sent: Thursday, October 02, 2008 12:56:15 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Sarah Leyrer
3449 33rd Ave W
Apt A
Seattle, WA 98199

(206) 214-8564

From: Lars Liden
Sent: Thursday, September 18, 2008 11:08:36 PM
To: Davies, Holly (ECY)
Subject: lead ban

I strongly oppose any effort to ban lead ammunition in Washington. I view this as nothing more than a back door attempt to limit my second ammendment rights and infringe upon my hunting heritage. There is no scientific consensus that lead from ammunition poses such a threat that it needs to be banned. The effects upon the economy and the reduced sales of hunting related materials will degrade funds collected by the Pittman Robertson act that provides significant resources for habitat protection.

Lars T. Liden

See how Windows Mobile brings your life together—at home, work, or on the go. [See Now](#)

From: Nancy Lill
Sent: Thursday, October 02, 2008 8:17:21 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Nancy Lill
7910 S Krell Rdg
Spokane, WA 99223

(509) 535-4533

From: Karen Sampson Liu
Sent: Thursday, October 02, 2008 9:42:19 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Karen Sampson Liu
3434 E. Yesler Way
Suite 540
Seattle, WA 98122

From: Emily Livengood
Sent: Friday, October 03, 2008 6:20:17 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Emily Livengood
8532 13th Ave NW
Seattle, WA 98117

206.948.5016

From: Mark & Vinee Lloyd
Sent: Friday, September 19, 2008 2:32:19 PM
To: Davies, Holly (ECY)
Subject: Comments on Draft Lead Cap

Can you please provide specific data supporting serious increases or risk due to lead related exposure. In other words you draft suggest that certain lands and waters or wildlife "may" have increased lead exposure due to activities using lead objects. What data has been taken and developed to support the stated risk.

Additionally, what exposure data on humans or children show that lead exposure is prevalent specifically in Washington.

Finally, the steps outlined in the draft to reduce lead exposure. Compared to the developed data what will be the risk reduction.

I believe that lead reduction is important, however, I believe this far sweeping draft should be reduced to key exposure activities or products that have developed data supporting true risk, and with clear actions that can really reduce the lead exposure to people.

Some of the activities or other products that are being suggested to be eliminated do NOT have suitable replacements and furthermore there was not suitable evidence to suggest that there really is a lead exposure risk.

I look forward to the public hearing.

Thank you,

Mark Lloyd
Ridgefield, Washington

From: austinlong911@aol.com
Sent: Thursday, September 18, 2008 7:37:20 AM
To: Davies, Holly (ECY)
Subject: Lead CAP

Dear Holly Davies,

It is with great concern that I write you this email. It has been brought to my attention that the right to purchase, own, and use lead-based ammunition in the state of Washington is under attack. I find this upsetting. The fact is, lead ammunition has been around since the creation of firearms, and is a necessary component for the firearm itself. Removing the ammunition source from the firearm, is essentially the same as removing any other vital part from the firearm. A trigger is also a vital part of a firearm. The gun won't fire without it. The same could be said for ammunition. Wouldn't you agree?

To me, the passing of such a regulation is an infringement on my second amendment right. To remove a vital part of my firearm is essentially the same as disabling my firearm. And that, to me, seems to be a clear slap in the face of the second amendment.

Unless you can point me towards another viable means of ammunition to keep my firearms fed and functioning (there basically are none), then I see no other way to maintain my firearms that the second amendment so clearly protects.

Sincerely,

Austin L. Long
Second Amendment Supporter

Looking for spoilers and reviews on the new TV season? [Get AOL's ultimate guide to fall TV.](#)

From: Priscilla Long
Sent: Thursday, October 02, 2008 11:49:17 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I strongly agree with the points made below. I support a very strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Priscilla Long
2208 North 40th Street
Seattle, WA 98103

From: Shane & Kristin Loper
Sent: Tuesday, October 07, 2008 7:05:24 AM
To: Davies, Holly (ECY)
Subject: Re: Comments regarding Lead CAP

Subject: Comments regarding Lead CAP
Date: Mon, 6 Oct 2008 14:55:06 -0700

Holly,

The following are my comments regarding the Lead Chemical Action Plan (CAP) as offered by the Washington State Dept. of Ecology. As I have stated in our previous conversations, I am an environmental professional with over 20 years experience directly related to hazardous waste and hazardous material management. I also am an avid hunter, fisherman and shotgun shooter. As a result of this interesting combination, I have a good grasp on both sides of this debate. In hopes of making this short and to the point, I will format this letter in an itemized approach; rather than standard letter format. My apologies if it is not as concise as I hope to make it.

Associated Cost with recommendation 9: The cost of 13 million dollars was given as an estimate for the impacts on shotgun shooters in the State of Washington (should non-lead shot be implemented). I did not see where this figure considered target shooters. It sounded as if the figures were directed at hunters only. If this is the case, I believe the 13 million dollar figure is grossly inaccurate. Most trap, skeet and sporting clay shooters, shoot tens of thousands of shells annually. Shooting alternative shot is much more costly than the estimated 3 times the cost mentioned in the CAP, will impact this figure dramatically. Also, the shooting of non-lead shot is not conducive with most specialty shotguns used for trap, skeet and sporting clays. This would render these very expensive guns useless adding to the already alarming price tag these recommendations are suggesting. Furthermore, as you are already aware, the Pitmann-Roberts Act requires sportsman to pay a specialty tax on associated hunting/fishing supplies which is used for environmental restorations. Other monies brought in to the state in the form of hunting and fishing licenses, food, hotel, Recreational Vehicles, clothing, etc. would all have significant sale impacts to Washington State's already astounding 3.2 Billion dollar shortfall should this recommendation be followed. Although this is not an intended impact of this recommendation, it's certainly a reality that needs to be addressed. **Sportsman are the environment's biggest and longest standing supportersc.the "green movement" must not forget this.**

Sanctioned Gun Clubs: The CAP mentioned environmental and health impacts feared to be created by target shooting. In fact, a particular "gravel pit" was referred too. The CAP did not mention the fact that most sanctioned gun clubs are privately owned, have strict rules, have physical barriers to keep unauthorized personnel out, and have relatively small "foot-prints" which most wildlife choose to not inhabit due to the localized associated noise. Also, the CAP did not mention the fact that it is industry standards to "mine" or "reclaim" the shot that has been used at the facility. This is done not because of an environmental concern, but due to price savings when the shot is re-used time and time again. Also, the where-abouts of these "sanctioned" operating gun clubs are known by the counties in which they are located. This removes future concern of land use changes and exposure to un-aware inhabitants. **There is a significant difference between the littered/contaminated random gravel pit target site and a certified operating shooting range.**

Elemental Lead and Soil Co-efficiency: The CAP its self discusses the fact that elemental lead in most soil types poses little to no migration risk. Lead in almost all soil types tends to bind very tightly on a molecular scale with the soil its self. This renders a lead that is not mobile and leaches only a few millimeters until it is bound up with a soil particle. Due to this phenomenon, lead shot poses very little risk to humans, wildlife and the environment at a gun club. The CAP appears to have "the sky is falling" approach when it comes to the hazards of lead. **Lead shot in water and soil has an extremely low risk factor.**

Risk Assessments: As environmental professionals, you and I were taught that the environment is full of randomness. These randomness impact the effects of certain elements

differently. Therefore "Risk Assessments" are a means to normalize different situations. In fact, when conducting an investigation on a contaminated site of any kind, a "Risk Assessment" is conducted to verify how the contaminant will behave and if any hazards are present. In this particular case, the Washington State Department of Ecology has turned its head to this standard practice and decided that **all Lead, in all places, is always bad**. This is disturbing and confusing to me. It gives sportsman the appearance of a **hidden agenda, conspiracy or bad science** at best.

Stake-holders at previous meetings: By reviewing the names of contributors during the initial CAP meetings, it is obvious that this CAP was produced in a vacuum. No attendees from the National Rifle Association (NRA), Amateur Trap-Shooting Association (ATA), National Skeet Shooting Association (NSSA), National Sporting Clays Association (NSCA), etc. were involved. When non-governmental organizations that who are known to be very liberal grossly outnumber sportsman at the table, it once again gives the overall appearance to sportsman of a hidden agenda or conspiracy. **Sportsman are extremely passionate about their second amendment rights and this CAP's recommendation has certainly raised concern in most who are aware of it.**

Confusion on the CAP's intent: I have seen the Original CAP, the corrected version and the "Lead Ammunition Focus Sheet". I have also had conversations with you personally. There still seems to be a contradiction in what is stated regarding the CAP and the Focus Sheet. The focus sheet and other correspondence from the Department of Ecology states that no ban or "phase out" recommendation is intended for lead shot. But on three separate instances it is referred to or insinuated in the CAP. **These can be found on page 208, 233 and 235.** Again, from the sportsman's stand point, this sends a very bad signal, one of conspiracy.

Toxicity of lead in general: The CAP discusses the toxic effects of lead. In many cases, it mentions the toxicity it poses to humans, wildlife and the environment. References are made to show the relationship between I.Q. and lead exposure. Others simply draw a parallel between lead exposure and blood lead levels. Several times in the document, assumptions are referred to as if they were fact. Other times the CAP discusses suspected symptoms from exposure, that are ambiguous in nature. **almost like an "illness junk drawer", that has no real proof of origin.** If one reviews the supposed effects from the ridiculous low proposed blood lead level (which is 20% of current target), they sound similar to the effects of minor children who have been subjected to a family divorce or that of a child who came from a chemically dependant family. Also, the CAP refers to the one or two cases across America where a child ate lead fishing weights and became ill or died. Or it gives the illusion that that studies are performed on the average children across America..when in fact the graphs shown were actually taken on children found in low income housing or tested on children whom showed a high likelihood of lead poisoning due to living conditions. While these are serious matters which need to be reviewed and dealt with in order to protect our children, these are relatively isolated events and these situations should not be portrayed as national trends and most certainly should not impact sports fisherman, hunters and shooters.

Data available but not used: The CAP is filled with "maybes, mights, coulds, possibles, etc". Why are we using "voodoo -science" or guess work when there is study groups available? Washington state has some of the nations oldest gun clubs in operation. Not only do these facilities offer valid information in soil studies, but the thousands of shooters could be available to perform volunteer blood lead tests on. This would remove all guess work as to the impacts of lead shot use at shooting ranges. In fact, as offered previously, I was involved in the soil study at the Walla Walla Gun Club which was conducted by a third party a few years ago. **The results were exactly as suspected..lead shot migration in soil is almost non-existent, and posed no threat to human health or the environment.** Should elevated blood levels be encountered, engineering controls, better hygiene practices and education should be the first option, not the death of a multi million dollar industry that offers so much enjoyment for so many people.

The hybrid approach of old and new practices: Much data presented was not current. In fact one chart that was intending to demonstrate the relationship between leaded gas and lead found in the environment showed a huge improvement in lead found in the environment..the problem is that the last two decades are not included. Also, it appeared that we are well past the 95

percentile in the removal of lead, but these remaining few which appear to contribute very little exposure are feeling the brunt of past smelters, mining facilities, leaded paint, leaded gas, etc. There needs to be separation and a risk analysis applied to the remaining products.

Regulationsc..enough is enough: The CAP points out that over 57 Federal and State sponsored requirements currently exist pertaining to the regulation of lead. These regulate the use, the manufacturing, the application, the removal, the drinking, air quality, disposal, discharging, clean up levelsc.and the list goes on. Other than "new" exposure levels or blood lead levels being established based on bad science, I see no added benefit to the people of Washington State from this CAP. It appears to be a "feel good" concept with little to no added benefit.

In closing, I truly appreciate the efforts made toward this cause; I just don't think it is accurate. Certainly not accurate enough to be considered good science. All parties should be included up front in venues such as this. I am a fourth generation shooting enthusiast, hunter and fishermanccI intend to keep the options available for my grandchildren and yours should they so choose. I would not suggest continuing a past-time that I believed threatened our environment or the welfare of my familycc.or yours for that matter. This CAP may have began with good intentions, but I think it has lost its way.

I hope I have not offended you in anyway, as that was not and will not be my intentions in future dealings. I am simply wanting to voice my concerns regarding a past time I have so much passion for. I'd hate to see it disappear due to speculation.

Again, thank you for the opportunity to comment.

Shane Loper
500 S. First. St.
Dayton, WA. 99328
509-382-4068

Netscape. Just the Net You Need.

From: Ruth Lorenz
Sent: Thursday, October 02, 2008 1:38:56 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Ruth Lorenz
PO Box 25862
Seattle, WA 98165

(206) 361-1069

From: Randy Loun
Sent: Saturday, October 04, 2008 8:56:19 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

It would appear that someone had their head up their behind with the report on AMMUNITION. What a crock. Wild game is an extremely small part of potential lead ingestion. In the same section you discuss canned food with lead used for seems. This appears to be one more attack via the back door on firearms ownership and shooting. This will significantly raise the cost of ammunition, make it difficult for those who reload to continue to do so and would eliminate bullet casting. Hunting and eating wild game is extremely low on the list of ways to obtain lead poisoning. Please don't become a part of the problem.

As a firearm enthusiast, I see this as a total failure to provide facts. Banning lead ammunition will not reduce lead in imported foods, candy, or chili peppers. Please explain how ammunition is involved in the canning process. What statistics do you have on children eating wild game? The section at page 105, is totally devoid of any fact- Baby food??? How does that relate to ammunition. Cree diet, I thought they used bows and arrows, how does Ontario relate to Washington? Since when did the Associated Press become an approved authority on anything. God help us if you make your decisions on their "scientific testing".

It appears you take information that has absolutely no relation to the topic and use it to justify the outcome. If that is the basis of your information you are seriously lacking the intelligence to hold your position and should be fired. If you are just anti-gun, which this appears to be, then you should be put in jail for violating our constitutional rights. Shame on you. If this is representative of your investigation into the issue throw this piece of garbage in the trash where it belongs.

Before you pass me off as a crackpot, I served in the US Army during Vietnam Era, as a computer repairman for a nuclear missile system, I was a police officer until injured in the line of duty and forced to retire. Currently I am an Attorney. I am a life member of Washington Arms Collectors, A life member of the NRA and I take the right to keep and bear arms seriously.

All I can say is this report is devoid of any meaningful information on the topic it is allegedly addressing.

Randy W. Loun
Attorney at Law
509 4th St. Suite 6
Bremerton, Wa. 98337

(360)377-7678

From: Nancy Lovejoy
Sent: Thursday, October 02, 2008 11:15:57 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- . Reduce the amount of lead used in food-producing-sports, such as fishing weights and ammunition.
- ? Lower the state's blood lead action levels for children and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products, helping manufacturers identify safer alternatives to lead, and sample testing more imported products.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Nancy Lovejoy
12 S. Lincoln St
Kennewick, WA 99336

From: lovett

Sent: Friday, October 03, 2008 3:07:12 AM

To: Davies, Holly (ECY)

Subject: Lead Chemical Action Plan

I will be 70 years old in 3 months. I have been eating birds, small game, and large game including deer, elk, sheep, and moose since I was 12 years old. I have also been active in competition shooting, bullet casting, and was a law enforcement firearms instructor for several years, these activities spanned a period of 40 plus years. I get a yearly physical exam, and I have no problem with lead contamination.

You may be interested to know the question of lead contamination came up in the state of Iowa. The Iowa state dept. of health has tested 500,000 Iowans under 6 years old for lead poisoning since 1992. This is 70 percent of all Iowans born after 1986, also included were 25,000 adults. There has never been a single case of lead poisoning which came from wild game. A lead ban proposal has died in Minnesota because there is a complete lack of proof that lead in ammunition is harming game.

There is no alternative to lead based ammunition especially for large game, the banning of this ammunition will result in the loss of millions of dollars spent in Washington State by the hunting industry.

Bob Lovett
Colville, WA

From: Elise Lufkin
Sent: Thursday, October 02, 2008 8:02:47 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to encourage you to support a strong Lead Chemical Action Plan.

30 years ago we passed legislation banning lead in gasoline and paint, because we recognized that it is extremely dangerous to children, even in small doses. We need to build on this and ensure that we get the lead out of our environment.

While the current draft plan takes some good steps forward, but the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

This will help keep our children safe.

Sincerely,

Elise Lufkin
2944 Fuhrman Ave E
Seattle, WA 98102

From: Lis Lutz
Sent: Saturday, October 04, 2008 7:03:59 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

This issue is very important to me, as I am concerned about the lobbying done by industry with regard to toxic substances in general. Ingredients which have been found to be harmful to humans and the rest of the living organisms on the planet have no place in consumer or other products such as fishing weight or ammunition, which ultimately find their way back to the earth and water.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Please carefully consider this issue from the perspective of the environment, which it is your mission to protect, preserve and enhance.

Sincerely,

Lis Lutz
611 NW 84th Street
Seattle, WA 98117

From: SAMUEL LYNN

Sent: Friday, September 26, 2008 8:44:00 AM

To: Davies, Holly (ECY)

Subject: Washington State Lead Chemical Action Plan

In reading through the Washington State Lead Chemical Action Plan, I find that a fairly comprehensive study has been done to determine the sources of all the lead contaminates in the state. It is apparent that heavy industry seems to be the most pervasive user of lead in their various manufacturing endeavors. My concern at this point is not with the regulations that have been put into place specific to those sources. My concern is with the possibility of harsher restrictions put into place with regard to gun owners. As measures have been enacted to deal with the lead toxicity as it pertains to wild fowl hunting, it appears now that target shooters are now being placed squarely in the bull's eye, so to speak. As your agency is aware, there are many sites in the state that are used for target shooting that are un-managed, ad hoc locations. These locations may or may not drain directly into the watershed and may pose a bonified threat to the ecology of the area and its wildlife. Each of these needs to be addressed individually and with non-draconian measures that put an undue burden on the shooting public. Also I am greatly concerned about the many gun clubs in the state whose operation would be negatively impacted by adverse, draconian, punitive measures. Such measures would also severely impact the shooting public who, by the way are already being pressured by the anti-gun establishment, anti gun organizations and associated lobbyists. I urge your office to measure your recommendations with appropriate consideration to the shooting public and not recommend any measure, which would further interfere with gun ownership and sport shooting wherever it is done safely and legally.

Thank you
Sam Lynn, USAF Retired
NRA Member

From: April Lynskey
Sent: Sunday, October 05, 2008 5:48:31 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

April Lynskey
5620 NE 44th St
Vancouver, WA 98661

From: Don/Toni MacAdam
Sent: Monday, September 22, 2008 8:50:58 AM
To: Davies, Holly (ECY)
Subject: lead ammo

The long and short of it isleave things alone. A ban on lead ammo is not necessary and will be another waste of state money & in this current economy we will not be able to afford it . And there is no danger to the public .

Very sincerely, Don Mac Adam

From: BC Macdonald
Sent: Friday, October 03, 2008 9:36:03 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

BC Macdonald
POB69
Albion, CA 95410

From: Janneth Macellari
Sent: Thursday, October 02, 2008 12:18:15 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Janneth Macellari
23412 9th PL W
Bothell, WA 98021

From: Julie MacGillis
Sent: Thursday, October 02, 2008 8:32:50 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

While the current draft plan contains some encouraging recommendations, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Julie MacGillis
103 NW 62nd Street
Seattle, WA 98107

(206) 706-6067

From: Steve Mack
Sent: Thursday, October 02, 2008 5:39:39 AM
To: Davies, Holly (ECY)
CC: dixon@comcast.net
Subject: Lead CAP

I'm a competitive rifle shooter and hunter who participates in High Power Rifle Matches and does a lot of shooting throughout the year. I also shoot pistols and loan my own ammunition.

At first glance, I'm suspicious about a potential ban on bullets containing some lead. It could easily be thought of as a method to shut down rifle and pistol range. Formally established rifle and pistol ranges always have back-stops that stop the bullets immediately behind the targets. The bullets aren't scattered around and people and kids obviously don't work or play in those impact areas.

The small amount of lead that comes into contact with the ground from bullets is less than environmentally inconsequential compared with other toxic contaminants.

I'm a commercial real estate broker and deal with environmental issues on a daily basis. I think it would be a mis-directed use of valuable human assets and our tax money to devote time to chasing the lead in bullets that so few people and animals come in contact with. There are many other serious environmental issues that warrant the government's time and attention. Steve Mack (503) 225-8488 / Work.

From: Laurence Maddux

Sent: Wednesday, September 24, 2008 8:52:19 AM

To: Davies, Holly (ECY)

Subject: lead ban

This isn't Russia. What a phony way to try to ban guns. As I teach in Social Studies- the government belongs to the people and has only the power we give to it. You people a beyond belief. I say NO! to you and your ilk. Larry Maddux, Ph.D

From: Edward Maher
Sent: Monday, October 06, 2008 6:49:20 AM
To: Davies, Holly (ECY)
CC: HAMRADIOED@MSN.COM
Subject: Lead Ammunition Ban

Ms. Davies,
I am contacting you in regard to the Draft Lead CAP and the potential danger of banning ammunition through the rule making authority of the Dept. of Ecology. I believe that this effort, which has been proposed elsewhere in the U.S., is just another backdoor attempt at gun control. Dry up the source of ammunition or make it prohibitively expensive, you render firearms useless and infringe upon the right to keep and bear arms.

There has been a host of bureaucratic and legislative chicanery in the past and present to control, encumber the use of or ban ammunition in various parts of the country from the state to federal level. For instance:

1. Put under jurisdiction of the U.S. Consumer Product Safety Commission as a hazardous substance and regulated into non-existence.
2. Ammunition microstamping - impractical, expensive and not an effective crime fighting tool.
3. Exorbitant and unconstitutional taxes on ammunition that would drive a lawful and legitimate industry out of business through the unconstrained and oppressive taxing power of government.
4. Banning so called "cop killer bullets", hollow point or other bullets that have a metal alloy other than lead.

The list goes on. I am opposed to the Dept. of Ecology's rule making power on this issue and would like to see ammunition removed from your jurisdiction.

The lead in ammunition is usually an alloy of tin and antimony, which makes it harder. This lead alloy is less a pollution concern in the environment. I don't think that the environment is saturated with lead bullets to give concern over lead pollution or poisoning. Lead is a chemical element (Pb) on the periodic table and is found on or within the earth. Most gun clubs have abatement policies and mine the spent bullets downrange and collect spent cartridge casings to sell to metal recyclers.

Instead of focusing on ammunition, I'd suggest that the Dept. of Ecology use its resources more wisely and undertake a more concerted effort to make sure that all the vast array of discarded electronics equipment: TVs, computers, phones, stereos/entertainment centers, DVD/VCR players, toys/computer games, etc., be completely recycled, especially to remove the heavy metals used in them. Additionally, more effort needs to be done to recycle the vast amount of chargeable and non-rechargeable batteries that have come to the end of their service life. These batteries have lead and other heavy metals in them and can range in size from very small batteries for hearing aids and watches to dry cells, phone batteries and up to the largest and heaviest batteries used in motor vehicles and other transport and heavy equipment, etc. This should be more of an environmental concern with millions if not billions of electronic items and batteries being discarded into our landfills.

Sincerely,

Ed Maher

From: Glenn Maiers

Sent: Monday, October 06, 2008 11:21:52 AM

To: Davies, Holly (ECY)

CC: SAM KOFFLER; BKOKAY@aol.com; james.husted@navy.mil

Subject: PROPOSED LEAD CAP

Dr. Davies,

I read with great interest the Department of Ecology's Lead Chemical Action Plan with an eye towards bullets and shot. I was not surprised at the general conclusions, which struck me as just another way to ban otherwise legal firearms ammunition and thus shut down sport shooting. While your primary focus was supposedly for child health it appears this study wants to ban firearm ammunition even though kids don't eat bullets.

Where to start? The Romans didn't use leaded gas so just how did traces of lead get into that ice? Maybe volcanoes, which your report mentioned only once as a natural source of lead?

No link was mentioned between leaded gas use and lead found in raptors. Many of those raptors hunt rabbits, mice, etc along the roadways. If lead has been found along those same roads in the amounts cited as contamination by leaded gasoline and the small game animals eat the plants growing there, is it not possible that the raptors are ingesting lead from this source? There would have to have been an awful lot of small game shot using lead ammunition in order for that many raptors to ingest as much lead cited in your study, wouldn't it?

On page 99 you mentioned recent reports of lead fragments being found in deer hunted in Wisconsin. What you failed to mention is that even the deer taken there with bow and arrow showed similar lead rates as those taken with firearms. And this was with no visible lead fragments in either category of animal.

Your study often seems to often blur the distinction between shotgun ammunition and handgun/rifle ammunition. And in some cases, it points towards lead shotshells causing avian deaths with no certain proof. Additionally, I saw no representation from either the firearms industry or hunting groups on the LCAP Advisory Committee which makes the study appear more like damnation without representation.

It took my entire Sunday afternoon to read all about how this report and the public servants who wrote it apparently want to educate, price and legislate me out of my pastime using conjecture, innuendo and false science. But, my Sunday is but a small price to pay to refute this report and its' blatant attempt at banning firearms ammunition, pure and simple.

Yours truly,
Glenn Maiers

From: Ann Manly
Sent: Thursday, October 02, 2008 7:15:43 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant; even in the smallest doses, it affects children's brains. No "safe" exposure level has been identified. We need to phase out the use of lead in products we bring home and products children are likely to be exposed to outside the home (playgrounds, community centers, school buildings, etc.)

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Ann Manly
739 34th Ave.
Suite 540
Seattle, WA 98122

From: R. A. Margulies

Sent: Sunday, October 05, 2008 9:58:19 AM

To: Davies, Holly (ECY)

Subject: Draft lead CAP

There is no reasonable, practical substitute for lead ammunition for hunting , self defense and target shooting.

The proposed ban is inappropriate.

R. A. Margulies MD MPH

FACPM FACEP FACFE

From: cathy marinella
Sent: Friday, October 03, 2008 5:22:56 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

cathy marinella
745 N. 195th Street
Shoreline, WA 98133

From: Chadwick Markel
Sent: Friday, September 19, 2008 3:15:13 AM
To: Steve Prentice; Davies, Holly (ECY)
CC: victorvjohanson@yahoo.com; Dave Abbott; Lemieux, Fran
Subject: Re: Lead Ban in Ammunition

I concur.

Chadwick G. Markel
8911 W. Grandridge Blvd.
Suite C.
Kennewick, WA 99336
(509) 947-5590 - cell #

----- Original Message -----

From: Steve Prentice <stevep@propertygems.com>
To: hdav461@ecy.wa.gov
Cc: victorvjohanson@yahoo.com; Chadwick Markel <chad_markel@yahoo.com>; Dave Abbott <shaksper@urx.com>; "Lemieux, Fran" <LEMIEUFH@nv.doe.gov>
Sent: Thursday, September 18, 2008 10:41:52 AM
Subject: Lead Ban in Ammunition

Dear Ms. Davies;

I am writing you to voice my opposition to banning lead ammunition. There is no Scientific evidence that lead based ammunition is a the culprit of lead toxicity to the public or anything else. Lead is a natural element. Poisoning is based on constant exposure at high levels over an extended period of time and that source can be scientifically traced. i.e. lead based paints, lead in solder used in plumbing/construction, fumes from smelters, mining operations and inadequate disposal of wastes from industrial sources

The banning of lead based shot from waterfowl hunting was based on shoddy scientific methodology, documentation and assumptions.

I urge you to stay with the facts not some other hidden agenda.

Sincerely;

Steve Prentice
29707 So. 959. PRSE
Kennewick, WA 99338
509.627.2880 eves
509.948.0266 daytime

RECEIVED

SEP 02 2008

Ecology - SWFA - Ind

KARL E. MARKIN, M.D.

181 REITMEIER LANE
SELAH, WASHINGTON 98942
(509) 697-3919

August 29, 2008

Holly Davies
Department of Ecology
PO Box 47600
Olympia, Washington

Dear Ms Davies,

I understand that the Department of Ecology is proposing to ban the use of lead in ammunition. I wish to strongly object to such a ban for the following reasons:

As a physician, and a hunter, I am keenly aware of the health hazards of lead ingestion; but there is no scientific evidence whatsoever, of any detrimental effect of eating meat from birds or mammals killed with lead ammunition.

There is no ballistically acceptable, affordable substitute for lead ammunition. Steel is notorious for wounding game birds, especially waterfowl, that escape and then die a slow and painful death. Tungsten is an excellent substitute, but costs fifteen times as much money. Restricting the use of ammunition to tungsten would severely limit the population of hunters to only the elite and affluent.

The hunting community provides the major funding for habitat, which is the essential factor in the quantity and quality of the wildlife we all enjoy.

It may seem paradoxical, but it is true that a ban on lead ammunition will, in effect, result in a significant decrease in habitat and wildlife in Washington.

Please do not ban lead in ammunition!!!!

Sincerely,



From: Phil Marshall

Sent: Saturday, September 20, 2008 12:04:47 PM

To: Davies, Holly (ECY)

Subject: Amazing

I learned about these hearings from my son who lives in Iowa! The public hearing have since passed so there is no chance to comment in person. As a recreational shooter and hunter I have a concern about the extent that these proposals could lead . Without the support of the sports community there is little chance for much happening. We all recognize the dangers of lead in the environment but your hearings and decision making process need to be both very public and transparent to gain support from those who are likely to be your most avid detractors. I am educated, active in the shooting sports, well read...and to hear about this from Iowa! What gives?

Sincerely,

Phil Marshall

From: CMJPlayboy@aol.com
Sent: Saturday, September 20, 2008 12:19:36 AM
To: Davies, Holly (ECY)
Subject: Lead Ban

First , JPlayboy refers to an antique auto mfg in Cleveland called a Playboy manufactured by Jordan Motor Company.

The ban on lead will have a huge impact on target rifle as there is no non lead substitute for lead bullets used in competition. Target rifle is an Olympic sport and a NCAA scholarship sport and a way for some students to attend college who might not otherwise have the means to go.

My daughter is one such student who plans to go to college on a scholarship. If she can not shoot in this state because of a lack of ammunition we will have to make the decision to move to a more friendly state so she has the opportunity to attend college

There is basically two manufactures of target ammunition, one in England and one in Germany. As they sell worldwide it would not be economical for them to cater to one state in the US and try and find a competitive non lead substitute for that one state when they can sell their current product around the world. Washington State has a history of producing Olympic medal winners and world champion shooters. It would be a shame to see this heritage come to an end because some one wants to ban lead in Washington

Target use of lead bullets is conducted in a safe manner, does not harm the environment, and usually recycled.

Thank You
Charles Martin

Looking for simple solutions to your real-life financial challenges? [Check out WalletPop for the latest news and information, tips and calculators.](#)

From: Margaret Louise Masar
Sent: Thursday, October 02, 2008 8:01:07 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is still found in many more products than people realize including vinyl which is used in children's lunch boxes, toys and furniture. If we want to keep our children safe, we need to know that we are not unnecessarily exposing them to lead.

Margaret Louise L Masar
18536 Fremont Ave. N
Shoreline, WA 98133

(206) 533-8758

From: Mason, Nicholas B
Sent: Saturday, September 20, 2008 3:09:38 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

I oppose the ban of lead ammunition, especially for target shooting. There is no adequate substitute for lead ammunition especially when cost is taken into account.

Regards,
Nicholas Mason

From: Paul Matheson
Sent: Friday, October 03, 2008 3:43:48 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. My granddaughter tested positive for high lead levels in hair samples, and she suffers from learning disabilities and Attention Deficit Disorder. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Paul Matheson
5822 N. Alameda Blvd.
Suite 540
Spokane, WA 99205

From: herb.maxey@farmersinsurance.com
Sent: Friday, September 19, 2008 7:15:24 AM
To: Davies, Holly (ECY)
Subject: Lean bullets

I have been around guns all my life. This is a thinly veiled attempt at gun control by controlling the ammunition. Most shooting is done at ranges. The lead is recovered and recycled. What little lead that goes into the environment from sport shooting is so small in quantity as not to be a hazard.

Herb Maxey,

***** PLEASE NOTE ***** This E-Mail/telefax message and any documents accompanying this transmission may contain privileged and/or confidential information and is intended solely for the addressee(s) named above. If you are not the intended addressee/recipient, you are hereby notified that any use of, disclosure, copying, distribution, or reliance on the contents of this E-Mail/telefax information is strictly prohibited and may result in legal action against you. Please reply to the sender advising of the error in transmission and immediately delete/destroy the message and any accompanying documents. Thank you.*****

From: Jim May

Sent: Saturday, October 04, 2008 1:11:42 AM

To: Davies, Holly (ECY)

Subject: lead bullets

Helen,

my name is Jim May I am a hunter and I appose having my lead bullets taken away, thank you, and I hope you vote against the bill that would take lead bullets away.

thank you
Jim May

From: McArthur, David S. ET1
Sent: Thursday, September 18, 2008 11:36:33 PM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

To Whom It May Concern:

I would like to voice my concern on restricting lead ammunition in Washington. As a 29 year resident of Washington I have enjoyed many outdoor activities with my family including outdoor shooting. It is my belief that this is a covert way of eliminating the use of firearms in Washington state; a truly despicable act. This in my opinion is purely a ploy by the state legislature and executive branch to once again try to eliminate the Second Amendment. If your intention is to improve our environment then you need to focus your bill on the companies who produce lead products and by products, not shooters. Washington has very few places that are not off limits to shooting, and off road vehicles; two joys of my childhood. I think you all need to take a good hard look at what it is you're trying to do.

V/r

David McArthur

"the right of the people to keep and bear Arms, shall not be infringed."- Second Amendment; The Constitution of the United States of America
Home of Record, Edmonds, WA

From: RAM

Sent: Thursday, September 18, 2008 3:50:42 AM

To: Davies, Holly (ECY)

Subject: LEAD ammo

Sir:

Of all the pollution threats and problems, lead ammo should be at the bottom of your list.

What about law enforcement and the military and home and self defense?

Don't mess with my security.

McCauley 18 Sep 08

From: Jeremy McClanathan
Sent: Thursday, October 02, 2008 7:11:17 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Jeremy McClanathan
22107 66th Ave W.
Unit #D2
Mountlake Terrace, WA 98043

From: Morris, Joan (ECY)

Sent: Tuesday, September 30, 2008 1:04:54 AM

To: 'McDowell, Gregory P '

CC: McGann, Jeanine (ECY); Davis, Kathy L. (ECY); Davies, Holly (ECY)

Subject: FW: Lead Ammo ban proposal

Mr. McDowell, thank you for your comments on this topic, I will forward them to the persons working on this issue. I did find a focus sheet that Ecology has put out giving more information on this topic. The best people to talk to would be Technical Contact: Holly Davies 360-407-7398 hdav461@ecy.wa.gov Media Contact: Kathy Davis 360-407-6149 kada461@ecy.wa.gov . If you are unable to get in touch with either Holly or Kathy please let me know and I will see what other methods I can find to get you the information you are looking for.

Thank you for your input

Joan Morris

Web Coordinator

Hazardous Waste and Toxics Reduction Program – Ecology

360.407.5767 jmor461@ecy.wa.gov



From: McDowell, Gregory P [mailto:Gregory_P_McDowell@RL.gov]
Sent: Monday, September 29, 2008 8:25 AM
To: Morris, Joan (ECY); McGann, Jeanine (ECY)
Subject: Lead Ammo ban proposal

I would like to comment that the proposed ban on lead ammunition is going too far. Lead substitutes can be mandated for certain types of hunting or certain areas. A total ban though is little more than backdoor gun control. Non lead ammo is 2-4 times more expensive than lead ammo. Competition shooters have little impact on the environment and to mandate no lead ammo is going to push the costs for these sportsmen upwards to the point that it will kill the sport. While that may be the intent, it certainly does not make sense that protecting wildlife should drive shooting sports into the ground. Given that several recent "studies" have been shown to be bogus especially when prepared by ecology minded folks, I want to provide input to the public comment section of your proposal.
Where and how do I write to get these comments into the record?
Thanx for your time.
Greg McDowell

From: Jim

Sent: Wednesday, October 01, 2008 4:17:20 PM

To: Davies, Holly (ECY)

CC: Jim Williams; 'Mike Stenger'

Subject: Comments on lead ammunition section of the lead CAP

Holly – please accept these comments on the ammunition section of the lead CAP.

There are several assertions without any correlation to scientific studies documenting harm to the environment due to hunting or sport shooting. For instance, there is an assertion that sport shooting puts lead into the environment. True enough, and the inference in your document is that all lead going into the environment is bad and leads to unhealthy animals and humans. That's true only if it is ingested or breathed. Just because lead bullets or shot are in the environment does not necessarily mean that they will be ingested by animals or will contaminate soils or groundwater to any harmful degree. There is no correlated scientific data connection the assertion regarding lead ammunition to harm to humans or wildlife.

Bad science or worse, no science, leads to bad policy.

I grew up in the Southeast, and have hunted for bullets on several battlefields of the War Between the States. I have found many intact bullets with only surface oxidation, indicating to me that lead dropped on a battlefield over 140 years ago has not found its way into soil or ground water in dissolved form.

Even a push for a voluntary effort to remove lead from ammunition is a solution in search of a problem. Come up with better science to support your assertions, or remove these specious assertions from the CAP.

Many thanks,

Jim McEntire
232 Woodland Dr.
Sequim, WA 98382
360-477-4103

From: VLMCGHAN@aol.com
Sent: Wednesday, September 24, 2008 3:02:35 AM
To: Davies, Holly (ECY)
Subject: CAP

I am opposed to the banning of lead shot. I am a hunter, trap shooter and fisherman. There is no substitute for lead ammunition. This ban would take away a way of life for lots of sportsmen in the State of Washington.

Vern McGhan
1632 Horn Ave
Richland, WA 99354
vlmcghan@aol.com

Looking for simple solutions to your real-life financial challenges? [Check out WalletPop for the latest news and information, tips and calculators.](#)

From: John McGregor
Sent: Thursday, September 25, 2008 11:11:42 PM
To: Davies, Holly (ECY)
Subject: Banning lead bullets

Lead bullets have been used in this country for 388 years with no significant harm to any species either flora or fauna except through the direct and purposeful action of some hunter. I don't believe any human has died from ingesting a bullet, nor any animal. Perhaps California Condors and Chickens, birds with gizzards, may be at hazard. However, we don't have any California Condors in Washington and we can hardly kill chickens fast enough to satisfy KFC customers.

Remember what happened to many in Congress in 1996 after they had voted for the so-called "Assault Weapons Ban" in 1994? They lost their jobs to gun friendly politicians. There are a lot of gun owners in this state that will be very unhappy if lead bullets are banned.

Please think about this and then reject any action that would ban these bullets. The cost to law enforcement and ammunition manufacturers alone would be staggering and what would be used as a substitute for lead? It could be several years until manufacturers could begin to supply LEO with adequate substitutes.

The whole idea is ludicrous to begin with and is just another way for anti-gun proponents to go after our guns.

Thank you for your consideration of this matter,
John McGregor
Edmonds, WA 98026

From: Patricia McHugh
Sent: Friday, October 03, 2008 4:19:05 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

I feel its very important for our future and especially our children's future.

Thank you,

Patricia McHugh
13033 122nd La NE
P304
Kirkland, WA 98034

(425) 821-0242

From: Sean

Sent: Thursday, September 25, 2008 2:32:04 PM

To: Davies, Holly (ECY)

Subject: Lead CAP

Hi Holly,

I have reviewed the new CAP for Washington state and have found a few flaws in the plan. I am currently employed in the tire industry at Discount Tire, the largest independent tire company in the country. We have with our suppliers come up with a plan to phase out lead based wheel weights in the near future as soon as current stock is depleted. I am also concerned about the lead fishing weights which could be equally constructed of a number of different alloys which would yield similar performance to lead at a very small additional cost. The one thing that I can't see being cost effective or even possible would be the phasing out of lead based ammunition. It is short of impossible to create bullets in small calibers ie; 17-.22 caliber in any other material except lead. These calibers are two of the most popular cartridges in the states and possibly the world. I would hate to see something that I grew up with taken away from future generations of young children. The passing on of knowledge and ability to properly care for and handle firearms has become part of our American heritage.

If the act of "phasing out" lead based ammunition were to be enacted I cannot see it possible to carry on one of the most enjoyable sports I have ever known. The sport of shooting has taught many thousands of children the proper use and respect for firearms that will prevent them from using them in a way that could harm society. I received my first firearm when I was 3 years old which I still own today. It fires 22 caliber based lead ammunition which is very inexpensive which makes it ideal for first time or amateur shooters to enjoy. It also makes it possible for many families not able to afford more expensive ammunition to enjoy the shooting sports. I also have much experience in the shotgun area which lead based ammunition is also used. I have on many accounts used non-lead based shot in areas of Washington which are designated "non-toxic only". The non-lead based shot is not nearly as effective in providing a "clean kill" in birds which can lead to injured bird fly off. This is something that can be hard to prevent if the ammunition being used does not provide enough damage to bring the bird down immediately. This is a view shared by many of my family members and close friends.

I would greatly appreciate your sharing of this document with your colleagues. I believe the success of the new CAP would be much greater with the support of all. This cannot be done when including such a "phasing out" of something so close to our hearts and vital to our future.

Thanks,
Sean McIntyre

From: Leah McManus
Sent: Friday, October 03, 2008 2:09:05 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Leah McManus
P.O. Box 65603
University Place, WA 98464

From: matthew mcwherter
Sent: Friday, September 19, 2008 12:44:59 PM
To: Davies, Holly (ECY)
Subject: lead ammunition

Dear Ms. Davies;

I oppose banning lead ammunition. There is no Scientific evidence that lead based ammunition is a the culprit of lead toxicity to the public or anything else. Lead is a natural element. Poisoning is based on constant exposure at high levels over an extended period of time and that source can be scientifically traced. i.e. lead based paints, lead in solder used in plumbing/construction, fumes from smelters, mining operations and inadequate disposal of wastes from industrial sources.

The banning of lead based shot from waterfowl hunting was based on unsupported scientific methodology, documentation and assumptions.

I urge you to stay with the facts not some other hidden agenda.

Yours Truly
Matthew Mcwherter

Richland Washington

From: Martha Means
Sent: Thursday, October 02, 2008 7:59:26 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Martha Means
6852 28th Ave NE
Seattle, WA 98115

From: Tiffany Megargee
Sent: Friday, October 03, 2008 1:24:11 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Tiffany Megargee
101 NW 173rd St
Shoreline, WA 98177

From: Sandi & Art Meikel

Sent: Saturday, September 27, 2008 7:28:48 AM

To: Davies, Holly (ECY)

Subject: lead ban

NO, NO, NO Find something constructive to do with your time and money.
A P Meikel

From: Mikhail Merkurieff
Sent: Friday, September 26, 2008 6:37:08 AM
To: Davies, Holly (ECY)
Subject: RE: Lead Ammo Ban

Thanks for the reply. I've been reading through the PDF. It must be difficult to find a balance in this, especially with all the emails like mine. Sorry about being a bit reactionary. I'm all for non toxic ammo, if only there were practical alternatives, particularly for the highly popular calibers for plinking like the .22 LR. Hunting ammo isn't much of a concern as I generally only buy a box or two for the season. But I have many thousands of rounds for my .22. At \$10 a box of 500 it's easy to stock up and is the economic choice for an afternoon of shooting pop cans. In my opinion, phasing out toxic hunting rounds is doable; the problem is finding a way to accommodate recreational shooting. When hunting I may only fire 1 or 2 rounds if any at all, but a Saturday of plinking can use up to a thousand rounds. That is the big contention among a lot of shooters; there simply are no affordable non-toxic rounds on the market suitable for recreational shooting. I've personally never even heard of a non lead based round for the .22.

Again, please forgive my jumping to conclusions. Legislation that relates to the 2ammendment, even as indirectly as considering the environmental impact of lead ammunition, really strikes a nerve.

Thanks Again,
Mikhail

From: Davies, Holly (ECY) [mailto:hdav461@ECY.WA.GOV]
Sent: Thursday, September 25, 2008 3:16 PM
To: mmerkurieff@sensorsweep.com
Subject: RE: Lead Ammo Ban

Thank you for sending in your comments on the Draft Lead CAP. Ecology is not proposing a ban on lead ammunition in the Draft Lead CAP. We would like to work with hunters and shooters to promote non-toxic alternatives to lead without negatively affecting hunting or shooting areas. I hope you will continue to come back and hunt in Washington.

We are required to consider all the options and include all the options in the CAP (WAC Chapter 173-333). We have to include a no-action option, an option that results in the phase out of uses and releases, an option to manage the chemical to reduce exposures, and other options such as available substitutes. After considering all the options, we decided to recommend working with stakeholders on voluntary steps.

Please take a look at the focus sheet we prepared about lead ammunition and the Draft Lead CAP. I've attached the fact sheet to this email or you can access it at:

<http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/>

Sincerely,

Holly Davies, PhD
Chemical Action Plan Developer
SWFAP/ Industrial
WA Department of Ecology
PO Box 47600

Olympia, WA 98504-7600
Phone: 360.407.7398
Fax: 360.407.6102

From: Mikhail Merkurieff [mailto:mmerkurieff@sensorysweep.com]
Sent: Thursday, September 25, 2008 12:48 PM
To: Davies, Holly (ECY)
Subject: Lead Ammo Ban

I grew up in Washington State. I moved away for school and career but not a day goes by that I don't feel homesick. I've just been made aware of the Lead Chemical Action Plan. I'm an avid outdoorsman, shooter, and hunter. Banning or restricting lead ammunition for target practice and hunting would effectively end that part of my outdoor activities in Washington State as there really are no practical alternatives to lead based ammunition for rifles and pistols. It would also be one less reason for me to move back to that beautiful state. The threat of wildlife ingesting lead from ammunition is greatly exaggerated. I'd be more concerned about the chemical contamination coming from open mines, tailing piles, quarries, and even from auto fluids and exhaust that collects along the sides of our roads, than from ammunition that is encased in copper or brass and has been buried into a dirt backstop. I understand the good intentions of this bill, but I fear the unintended consequences for one of the outdoor activities I cherish the most.

Sincerely,

Mikhail Merkurieff

From: Andy Mesojednik
Sent: Thursday, September 18, 2008 5:35:23 AM
To: Davies, Holly (ECY)
Subject: Lead Cap Program

Hi Holly,

I was just informed of this lead Cap plan, and noticed that there was not one person on the committee who represents the shooting sports. Was this a deliberate attempt to exclude shooters from the process? Also, since this proposal affects hunters, I notice there is not one single person on the committee from the department of fish & wildlife, although one of the advisors is from wdfw. I would like an explanation as to why people from both shooting sports and WDFW are not on the committee.

Thanks in advance for your response.

Andy Mesojednik
360-537-4043

From: Marypat Meuli
Sent: Thursday, October 02, 2008 11:45:31 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

I'm concerned about lead in the environment and have personal experience with it - we had our 1926 house in Seattle tested for lead, and the high numbers are one of the reasons we decided to move to a new home in Kirkland before our son's birth.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Marypat Meuli
489 2nd Ave S
Kirkland, WA 98033

425-223-2854

From: RD Meyers
Sent: Sunday, September 21, 2008 5:33:53 AM
Subject: RE: Lead Ammunition ban

Mrs. Davies

I'm vehemently opposed to your plan to ban lead ammunition from Washington. Your proposal to ban lead ammunition is preposterous. The health risks it poses to humans and wildlife is minimal. Considering how long it's been in use. Instead you should ban fluorescent light bulbs as they contain large amounts of lead and mercury. You know mercury is what made the Mad Hatter mad. Are you also going to ban car batteries? You know they also contain large amounts of lead. I demand you spend my tax dollars wisely. I don't see anything of value in your efforts to ban lead ammunition. But a colossal waste of my tax dollars! Your only goal is to take away my Second Amendment rights through the backdoor. You should consider what you'll kill in this State with your ban You will kill hunting in the State which is a source of revenue through hunting licenses. You'll kill the shooting sports in the State. Revenue again through taxes on ammunition purchases. You'll kill Mom and Pop gun shops throughout the State. Business licenses another source of revenue. A gun without ammunition is like a car without a battery. Useless. So you want to send all the revenue from hunting licenses and ammunition purchases to Oregon and Idaho!? Oh what about enforcement? Do you expect me the tax payer to pay to enforce your ban on ammunition? Again I demand you stop this preposterous waste of my tax dollars, in a backdoor attempt to take away my Second Amendment rights! The Second Amendment is a GOD given right. Thank GOD for the NRA who let me know of your preposterous waste of my tax dollars and threat to my freedom.

Sincerely,
Robert Meyers
Richland, Washington.
Freedom is NOT Free

From: Klaus Meyn
Sent: Saturday, September 20, 2008 8:41:56 AM
To: Davies, Holly (ECY)
Subject: Prohibition of lead in Ammunition

I am registering my opposition of your plan to prohibit lead in ammunition, a fact that is the most drastic move in the USA, not only against lead but also against hunting all together. Lead is already prohibited in the areas of the most concentrated use, namely in the hunting of waterfowl. I consider it an abuse of burocratic power. I am an evironmentally responsible hunter. By copy of this note I am notifying Govenor Gregoire of my sentiment about this illconceived move.

Sinverely,
Klaus Meyn
kmeyn@oz.net
6305-159th Place NE
Redmond, WA 98052
425 885 3306

From: Steven Miale
Sent: Thursday, September 18, 2008 6:09:20 AM
To: Davies, Holly (ECY)
Subject: Comment on the Lead Chemical Action Plan

Hello,

I would like to comment on the Lead Chemical Action Plan.

I am opposed to this, in particular for ammunition.

I would like to say that I am not a hunter. I do shoot, but for recreation, and (hopefully something that I will never need to do) as practice for self-defense.

First, I'd like to focus on bullets for pistols and rifles.

There is little alternative to lead-free ammunition. Steel core ammunition (where the bullet is made from a soft steel) for rifle and pistol rounds is considered "armor piercing", and thus is illegal in many areas, and cannot be imported. This would make it impossible for law-abiding citizens to engage in shooting sports, much less hunting. It also introduces the risk of ricochet, which is why many ranges and classes prohibit the use of even steel-jacketed ammunition on metal targets.

There are alternatives, such as copper; however, as you may know, copper prices have skyrocketed, and it is difficult to find these; also, they are very expensive relative to current lead-based ammunition. My concern is not just on the shooting sports, but on self-defense.

A typical class on self-defense uses at least 600 rounds of ammunition, and sometimes in the thousands. This does not include future practice, which I think we can both agree is extremely important. Doubling or tripling the cost of ammunition would severely impact the ability to practice (and mandating the use of lead-free bullets would increase demand for them, thus further increasing cost.) This would especially effect those on limited income, who may live in neighborhoods where they would feel the additional need for self-defense; in effect, this would be a regressive tax.

Also, you note the Barnes Bullet on the bottom of page 98; however, this is just the bullet itself, not loaded ammunition. Unless one is making their own ammunition, finding commercially produced ammunition

using said bullet is difficult. Also - as claimed on the Barnes pages on these bullets (see <http://www.barnesbullets.com/products/rifle/tsx-bullet/>), these are considered very deadly. While this may be fine for hunting, it is definitely NOT fine for self-defense; speaking as someone who has taken several classes in self-defense, it is always emphasized that our goal is NOT to kill, but to stop the attack, and I completely agree with that. (It would also mean that criminals would be using deadlier bullets as well. I don't want that either.)

Lead-free bullets also do not typically fragment (this is noted in the report, bottom of page 98.) This is actually very bad; fragmenting ammunition is used for self-defense because it is more likely to break up once it impacts; if the bullet does not fragment, it would continue through the target, thus having the potential to hurt those behind the target.

Second, I'd like to talk about the primer. The primer is used to ignite the gunpowder; primers contain lead. It is unclear whether the replacements are any better. For instance, one patent on lead-free primers (<http://www.freepatentsonline.com/5684268.html>) indicates the presence of barium (which is toxic according to the CDC; see <http://www.atsdr.cdc.gov/tfacts24.html>) and antimony (which is classified as a carcinogen by the EPA, and has been linked with other health problems as well; see http://www.epa.gov/ogwdw/contaminants/dw_contamfs/antimony.html.) I'm not aware of any long-term studies to determine the impact of these when used in ammunition; however, considering that government agencies already consider these chemicals toxic, it's not clear whether lead-free primers will be any less-toxic than the current lead-based ones.

Third, I'd like to focus on ammunition in general, in particular availability and cost.

I'd invite you to examine Internet sites that sell a wide variety of ammunition, as they have more selection than a typical store (be it Walmart, Cabelas, or a family operation.)

One very popular site is Ammoman.com. They do not carry *any* lead-free ammunition for the three most common pistol rounds (9mm, .40S&W, and .45ACP.) For the most common rifle rounds (such as .30-06, .308, 7.62x39, and .223/5.56), only the latter is available

lead-free. There are several problems. First, .223 is not a common round used for hunting (for reference, this is the round that AR-15s use.) Second, the ammunition is 2-3x more expensive than alternatives.

However, perhaps the biggest problem is that this is US Military ammunition. It is not common to find military ammunition for sale, for obvious reasons (such as the wars that the US is currently involved in.) Also, there are now Federal regulations prohibiting the sale of military surplus ammunition to civilians. This makes this ammunition both rare and expensive. (As an aside, the most common rounds that the military uses, both in training and in combat - M193 and M855 - are not lead-free.)

You may also wish to visit AmmunitionToGo.com. Here, the most popular hunting rifle round of all - .30-30 - is completely unavailable lead-free.

Finally, impact on the law enforcement. Using more lethal rounds would impact both the police (as they also do not "shoot to kill") but also law-abiding citizens who may find themselves shot and have a lower likelihood of survival. It would increase costs for police training. Also, current gunshot residue tests would need to change.

In short, I do not support this proposal. It would severely impact the shooting sports and training for those who are interested in self-defense; it would be a regressive tax; and it isn't clear that the health impacts of the change in primer would be any better for the person shooting the weapon.

Thank you for your time reading this rather long email :)

Respectfully,

Steven Miale
Bothell, WA
425-891-2840

From: mielkemouse
Sent: Monday, October 06, 2008 2:37:16 PM
To: Davies, Holly (ECY)
Subject: Re: Lead Chemical Action Plan

I do not support the this plan.

Thank you
Doug Mielke
Member of Spokane Rifle Club

From: Richard Mikita

Sent: Saturday, October 04, 2008 2:11:34 PM

To: Davies, Holly (ECY)

Subject: Draft Lead CAP

Dear Ms. Davies,

I would like to give you my opinion on the idea of banning of lead ammunition and fishing sinkers.

There is no REASONABLE substitute for lead ammunition. For bird hunting , with a shotgun, there are some alternatives, but they are extremely expensive. Many hunters cannot afford such ammo. For big game hunting there are very few alternatives, and none that are satisfactory according to many experienced hunters. The same applies to fishing lures and sinkers.

Please concentrate on the really dangerous polluters, like Hanford, and leave the fisherman and hunters alone.

Thank you.

Respectfully,
Richard Mikita

From: charles milender
Sent: Thursday, September 18, 2008 12:08:58 PM
To: Davies, Holly (ECY)
Subject: lead ammo banned

What a waste of tax payers money. this will end up in litigation. I an sick and tiered of the the gov. trying to tell me what i can and cannot do. I just heard about this and will do some research. you will hear from me again.

Stay up to date on your PC, the Web, and your mobile phone with Windows Live. [See Now](#)

From: Jerry Miler
Sent: Friday, October 03, 2008 1:16:42 AM
To: Davies, Holly (ECY)
Subject: Lead Ammunition Ban

Dear Holly Davies,

I do not want to see a ban on lead ammunition. As a shooter and member of Clark Rifles I do not see an alternative to lead ammunition. What this would be is a ban on guns.

Thank You,

Jerry J. Miller
14720 NE 18th St
Vancouver, WA 98684

From: THEFAITHWK@aol.com
Sent: Tuesday, September 30, 2008 9:05:42 PM
To: Davies, Holly (ECY)
Subject: Lead Ban

Please don't outlaw my bullets, there is so much more on all of our tire weights. Ammunition is really expensive these days so shooting is already down. Please don't try to regulate my freedom on this issue.

Thankyou, Harry Miller

Looking for simple solutions to your real-life financial challenges? [Check out WalletPop for the latest news and information, tips and calculators.](#)

From: Ken Miller
Sent: Tuesday, September 30, 2008 1:35:42 AM
To: Davies, Holly (ECY)
Subject: Lead ban

Holly,

I am completely opposed to an outright ban of the use of lead, especially in regard to sporting uses. The examples used to justify the ban in the case of lead shot for hunting are cases of localized problems and those have been addressed and are solvable without a ban of lead. I volunteered during the swan program searching for the source of lead that was killing them and it is pinned down to an area that will have to be cleansed, but the ban of lead shot would have no effect on this in any way; the lead is from years ago and is a unique situation. Those opposed to hunting are using this lead issue to further their cause and will not help wildlife in the least. As you are most likely aware, the use of lead in hunting waterfowl has been banned since 1991. The idea that "upland birds and other must be dying of lead poisoning" is not proven, but is only speculation which is accepted as truth.

Please don't cause a lead ban as a feel good measure and force the sportsman to forgo his pastime, one which generates the very revenue that is the basis for wildlife conservation. Rising cost for alternate ammunition materials if not really feasible could seriously curtail the numbers of hunters in the field.

Respectfully,

Ken Miller
Lynden WA

From: Kip Miller
Sent: Thursday, October 02, 2008 12:01:31 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Kip Miller
P.O. Box 424
North Bend, WA 98045

(425) 831-6054

From: millerles@charter.net
Sent: Thursday, September 25, 2008 1:24:46 PM
To: Davies, Holly (ECY)
Subject: Lead chemical action plan

After having read the executive summary, I must comment on your proposal. The adverse affects of lead are as is pointed out very well known. However, the use of lead for bullets for muzzleloading firearms really needs to be exempt from any bans, there is simply no suitable substitute. The level of exposure from this source especially as compared to other sources listed in the report have got to be pretty insignificant. I would like to see lead ammunition used for muzzleloading arms, modern pistols, and rifles excluded from any future bans.

Thank you for your consideration.
Les Miller

From: Mike Moehnke
Sent: Monday, September 29, 2008 11:33:42 PM
To: Davies, Holly (ECY)
Subject: Lead Bullet Ban Proposal

Ms. Davies,

I would like to let you know that I am against the proposed lead bullet ban. There is no good substitute for lead bullets, and the impacts on wildlife and/or humans do not justify the removal of these bullets. We must be very careful not to allow ourselves to have kneejerk reactions. Just because California does something does not mean it was correct or even beneficial.

Regards,

Mike Moehnke
4497C Luther Rd
Springdale, WA 99173
509-258-8819

From: Charles Mohseni
Sent: Friday, September 19, 2008 3:29:00 AM
To: Davies, Holly (ECY)
Subject: Very much against

I am very much against this proposed ban on Lead bullets.

Charles Mohseni
Seattle, WA

From: Heather Moore
Sent: Wednesday, October 01, 2008 1:48:15 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Chemical Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Heather Moore
530 Ensley Ln. SE
Tumwater , WA 98501

(360) 352-0904

From: jeffcmor@aol.com
Sent: Thursday, September 18, 2008 6:04:59 AM
To: Davies, Holly (ECY)
Subject: Lead Ammunition

Ammunition

Can you please explain to me just how much lead poisoning you expect to prevent by the banning of lead ammunition for hunting and target shooting? It seems to me it would be a non factor in your search due to the minute amount that enters the environment. Just because the ammunition is made of small amounts of lead is reason to ban it? If I were you, I would go after the computers and car batteries before I worried about the tiny bit from ammunition. You people have already banned lead shot gun shells for waterfowl. How much difference did that make in the lead content in the state? I bet it did not register!

I grew up around things with lead paint and have been in contact with lead ammunition for the last 48 years of my life. I am 58 years old and healthy. I would say that the chance of getting lead poisoning from ammunition, in the State of Washington, is 0!!

If you people are looking for a way to justify your jobs, why not go after the batteries and computers! This state is always one of the first to enact laws and regulations that strip the rights of the taxpayer. I have noticed that whatever California does with some of their ridiculous laws, Washington State seems to follow suit. Monkey see-Monkey do!!

Why don't you hold more discussions in smaller areas of the state and get the input of the people that really use the ammunition. You are currently holding the hearings in Seattle and Spokane. Why would you hold a hearing on this subject in Seattle, a city full of tree huggers and liberal anti-gun advocates?? Gee, I guess I can figure that one out!!

Bottom line is:

The Washington State Government has MUCH too much power and has been the main culprit for stripping the Taxpayer of their Rights. The Washington State Government Caters the people and Politicians in Seattle!

Thats my two cents worth!!
Thanks for your time,
Jeff Moore

131 W Dinning Rd
Shelton, Wa. 98584

From: Rita Moore
Sent: Thursday, October 02, 2008 2:07:22 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Rita Moore
6 Fern Hollow
MERCER ISLAND, WA 98040

(206) 275-3883

From: Dave Morel
Sent: Friday, September 19, 2008 11:10:31 PM
To: Davies, Holly (ECY)
Subject: Banning the use of lead ammunition.

I would like to voice my opinion on lead CAP as it pertains to firearms ammunition. I am not against the banning of any toxic substance if a VIABLE substitute has been developed. There is currently no VIABLE substitute for the use of lead in rifle and handgun ammunition. History shows that governments, whether Federal or local, have an extremely poor record when it comes to banning substances without thinking through the consequences of their actions. I believe that banning the use of lead in ammunition, at this time, will create far more harmful situation for both humans and wildlife than the lead itself ever will.

cerely,

Sin

vid Morel, President

Da

rel Farms Inc.

Mo

71 Guy Fine Rd.

15

Ila Walla, WA 99362

Wa

relfarm@hughes.net

mo

From: JoeMoreland

Sent: Wednesday, October 01, 2008 6:19:23 AM

To: Davies, Holly (ECY)

Subject: Lead in bullets

When you say that lead needs to be removed from bullets you are actually wanting to restrict, if not stop altogether, the use of personal fire arms. We hunt to put food on the table. It is not an option, especially with the cost of everything going up. When we go hunting it is not for trophies to mount on our walls, it is for food to put on the table.

Lead has already been removed from paint for houses and paint for some types of art. Plumbers don't use lead pipes anymore. We will not give up hunting until we become too feeble to go hunting. At which point, our children will still be hunting. Lead needs to stay in our bullets.

Joe and Sena Moreland and family
193 E. Sleeper Rd.
Oak Harbor, WA 98277

From: Morgan, Andrew R
Sent: Friday, September 19, 2008 5:00:37 AM
To: Davies, Holly (ECY)
CC: morgana918@msn.com
Subject: LEAD CAP

Ms. Davies

I would like to make a few points regarding the CAP of Lead and I apologize if the ideas here are a bit disjointed as I am being distracted at work off and on. Please bear with me while I write the following and I hope it makes sense as myself and friends feel quite strongly on the following.

As an avid hunter and fisherman I speak on behalf of myself as well as my immediate cohorts that I engage in these activities with, when I say that we use as little lead shot as possible when hunting game birds because we know it is bad. Our difficulty with the ban of lead ammunition is that viable alternatives are not available in all cases where hunting certain species necessitates small shot size, particularly dove hunting. I don't know of an alternative to lead shot that comes in #8 or smaller shot that isn't outrageously priced if available at all. Not to mention that when shooting trap or skeet #7 ½ or smaller is the best size shot to use and at many ranges that size is required but lead alternatives are horribly expensive and make this activity prohibitive. Less practice at the range means "rusty" shooting skills hunting which will lead to increased crippled birds.

Lead shot alternatives for shotgun methods of hunting big game, buck shot and slugs, to my knowledge aren't available. The manufacturers need to be on the side of your department to promote the "safe" alternatives to lead and to also make them comparably priced and provide adequate field testing to ensure function.

To the point of lead in rifle bullets, the hunting conditions in Arizona are not comparable to Washington, in my opinion. We need the hitting power of lead or something of its equivalency as our weather and environmental factors would, again in my opinion, not be well suited to solid copper bullets regardless of trajectory and ballistics. Obviously more situational results need to be reported to sway skeptics like myself and again manufacturers need better publicity on alternatives.

Also, muzzleloading is quite popular and is on the increase in use in WA state for the purposes of hunting big game. As the equipment and regulations allow, lead is the only option. This whole group of people would be totally disaffected by not being able to use lead. I don't know of a viable alternative to lead shot in this instance. How would this group fall into the proposed banning of lead?

Don't forget that some firearms can not safely shoot anything but lead based on the manufacturing practices when they were built, case in point antique firearms. These will then become wholly obsolete. What will become of these "tools"?

To the point of law enforcement and private person defense, lead is a hitting power component to bullets used in handguns. We must practice with what we intend to use in the field or home for personal defense. Please do not compromise the safety of our officers or my family by making it illegal to use lead containing ammunition in the use of self defense unless a viable alternative is available and priced the same as lead bullet rounds.

I suppose my above comments are best summarized in the following sentences.

While I, and my cohorts, support the idea that lead is bad for the circle of life, it is a necessary component until something better and similarly priced comes along. We REQUIRE the same performance of lead in fishing tackle, bullets, shot pellets, and so on in order to maintain clean kills and efficient use of our sporting equipment (fishing gear, etc.). If alternatives are available, please push for them to be priced and sold in the same measure (25 rounds per box in the case of shotgun shells, etc.) as steel or lead and help to promote the use of these products in the interest of eliminating lead use. Things are already very expensive and activities such as these are a national heritage and should not be cost prohibitive based on the price of ammunition. I firmly believe that if the money holding politicians are serious about changing this lead use that sportsman will gladly comply once the COST of the items is not prohibitive.

Furthermore, personal security, whether law enforcement or other, should not be compromised by the passing of this CAP. If alternatives are available that can perform as good as or better than lead containing rounds, great. Promote their uses.

Thank you for taking the time to read this and believe me when I say that I do support the phasing out of lead in most situations provided that there is a similarly effective viable alternative that is priced the same or better than lead. I will and do use as little lead containing ammunition but until the manufacturers "get the lead out" it is difficult for shooters and fishermen to say no when it is cheap and is known to work well.

Regards and good luck with the Lead CAP.

Andrew R. Morgan
Research Technician
Fred Hutchinson Cancer Research Center
1100 Fairview Ave N, D4-100
Seattle, WA 98109
armorgan@fhcrc.org

From: Bob Morris

Sent: Thursday, September 18, 2008 11:27:31 AM

To: Davies, Holly (ECY)

Subject: Chemical Action Plan (CAP).

I am against this plan. I see little or no benefit to removing lead bullets from hunting ammuniton and other ammuniton. Please defeat this plan. There should never be a law banning posession of lead by the free people of America.

Robert J. Morris
Eatonville, Wa. 98328

From: fclabs@foxinternet.com on behalf of fclabs
Sent: Friday, September 19, 2008 1:42:19 AM
To: Davies, Holly (ECY)
Subject: RE: Chemical Action Plan (CAP).

Thank you for the reply. I have ready the focus sheet. I disagree that lead from bullets is a significant hazard to animals and humans, unless they are shot. The high level of lead in a target range is a known factor to humans and I do not believe it is a problem we need to deal with. I vote to table any campaign to promote non-toxic alternatives to lead, which would always be the first step to more control.

Robert Morris
Eatonville, Wa.

----- Original Message Follows -----

From: "Davies, Holly (ECY)" <hdav461@ECY.WA.GOV>
To: "Bob Morris" <fclabs@foxinternet.net>
Subject: RE: Chemical Action Plan (CAP).
Date: Thu, 18 Sep 2008 09:03:24 -0700

>Thank you for sending in your comments on the Draft Lead
>CAP. There is no proposed ban on lead ammunition in the
>Draft Lead CAP. We would like to work with hunters and
>shooters to promote non-toxic alternatives to lead without
>negatively affecting hunting or shooting areas.
>
>Please take a look at the focus sheet we prepared about
>lead ammunition and the Draft Lead CAP. I've attached the
>fact sheet to this email or you can access it at:
>
><http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/>
><[https://owa.wa.gov/exchweb/bin/redir.asp?URL=https://owa.wa.gov/exchweb](https://owa.wa.gov/exchweb/bin/redir.asp?URL=https://owa.wa.gov/exchweb/bin/redir.asp?URL=http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/)
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>[leadcap/](https://owa.wa.gov/exchweb/bin/redir.asp?URL=http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/)>
>
>Sincerely,
>
>Holly Davies, PhD
>
>Chemical Action Plan Developer
>

>SWFAP/ Industrial
>
>WA Department of Ecology
>
>PO Box 47600
>
>Olympia, WA 98504-7600
>
>Phone: 360.407.7398
>
>Fax: 360.407.6102
>
>
>
>
>
>From: Bob Morris [mailto:fclabs@foxinternet.net]
>Sent: Wednesday, September 17, 2008 7:28 PM
>To: Davies, Holly (ECY)
>Subject: Chemical Action Plan (CAP).
>
>
>
>I am against this plan. I see little or no benefit to
>removing lead bullets from hunting ammuniton and other
>ammuniton. Please defeat this plan. There should never be
>a law banning posession of lead by the free people of
>America.
>
>
>
>Robert J. Morris
>
>Eatonville, Wa. 98328
>
>
>
>[Attachment: AmmunitionFocusSheet.pdf]

From: Stacy Morse
Sent: Saturday, September 27, 2008 1:06:16 AM
To: Davies, Holly (ECY)
Subject: Lead ammunition

Holly,
There is no adequate substitute for lead ammunition and that any affects on humans and wildlife do not justify a ban as recommended by the Department of Ecology. Please pass my opinion on and stop this unnecessary Draft Lead Chemical Action Plan.

Thank You,
Stacy Morse

From: John Moulton

Sent: Friday, September 19, 2008 9:36:28 PM

To: Davies, Holly (ECY)

Subject: Lead

Lead is a natural occurring mineral present in the ground. Hunters have eaten meat shot with lead for centuries, though I have for only 54 years. My lead level is at 6. This is not a real solution to a problem, California science should require adequate proof not knee jerk reactions.

From: Joe Muller
Sent: Monday, September 22, 2008 3:15:26 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

I am opposed to the Ecology Lead Chemical Action Plan particularly as it relates to banning the use of lead ammunition in the State of Washington.

There is no adequate substitute for lead ammunition. Also, the impact of lead ammunition to humans and wildlife is not significant enough to justify such a ban.

Thank you

Joseph Muller

From: Jim Mulligan
Sent: Thursday, October 02, 2008 11:10:12 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Jim Mulligan
101 NW 58th St.
#10
Seattle, WA 98107

From: Jerry Mullin
Sent: Monday, October 06, 2008 8:41:20 AM
To: Davies, Holly (ECY)
Subject: CAP

Dear Ms. Davies,
I respectfully submit to you that there is no adequate substitute for lead ammunition and that any affects on humans and wildlife do not justify a ban as recommended. I happen to believe this is a political backdoor effort to squeeze gun owners rather than an effort to protect the environment.

Sincerely,
Jerry Mullin
Centralia, WA

See how Windows connects the people, information, and fun that are part of your life. [See Now](#)

From: Joe or Judy Munn
Sent: Tuesday, September 30, 2008 1:31:16 AM
To: Davies, Holly (ECY)
Subject: lead ammo

Dear Holly Davies,

I have great concerns about the possibility that the Department of Ecology is considering a band on ammunition.

This would be devastating to anyone who owns a gun and it appears the main for doing this is for gun control. There is no adequate substitute for lead ammunition and that any affects on humans and wildlife do not justify a ban as recommended by the Department of Ecology. If the Dept of Ecology wants to outlaw lead bullets then they better outlaw lead weights for fishing and lead weights used to balance car and truck tires and many other items as well. Tons of lead is used in rivers, lakes and salt water to catch fish and I see lots of tire weights that have fallen of wheels along side the roads, and in ditches where water runs and in parking lots where there is run off. I challenge them, Dept. Ecology, to put a hand full of bullets, which at least 95% have a copper jacket on them, on the ground in some grass somewhere and watch it for 20 years and see how much damage will be done to the soil or how many wild animals ate the lead and got sick or died. Our local gun club just had a clean bill of health from EPA a while ago that there were no lead problems, they, the gun site runs a clean show. You know how much lead is at a gun site?

Please take the above into consideration. I think that if this does pass there will be some lengthy and costly major law suits.

Regards,

Joe Munn
328 Munn Road
Quilcene, WA 98376

360-765-3587

From: Chet A. Munro

Sent: Friday, September 19, 2008 2:17:18 AM

To: Davies, Holly (ECY)

Subject: Lead Ban

Since when has your department decided to take over Fish and Wildlife with your ignorance? You obviously have zero experience with any real conservation that has been going on for many years based on the experience and sound judgment used in regulating areas that are sensitive to the use of lead shot. You must also be blind to the fact that lead is found naturally in all parts of the world and has many uses, one of which is ammunition, but that is one of the lesser uses if you have done any research at all.

The second fact that you are ignorant of is that ammo manufacturing is going through a transition phase that has taken 20 years so far and is still only half way there with alternatives. Being someone that has a long history in all uses of lead products, I do have some knowledge.

The last comment is that just because California decides to be a knee jerk reaction with shaky science concerning the POSSIBILITY of a Condor eating lead from a dead carcass, even though lead occurs naturally in these areas, don't mean we have to have the same type of reaction. Of course you might want to import some Condors, (which will freeze to death in the winter here) so you can continue the charade.

From: Patricia Murphy
Sent: Thursday, October 02, 2008 8:10:44 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Patricia Murphy
8835 Burke Ave N
Seattle, WA 98103

From: Peter Mussen

Sent: Sunday, September 21, 2008 7:35:52 AM

To: Davies, Holly (ECY)

Subject: lead ban

Has it ever occurred to you so-called intellectuals that if the democrats have their way that the only hunting implements we outdoorsmen and women will have are black powder muzzleloaders? THEY SHOOT LEAD BULLETS! How do you expect us to put wild game on a table barren of store bought food because gasoline is \$4+ per gallon? IDIOTS.

From: Naomi Nachun
Sent: Thursday, October 02, 2008 11:33:07 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

As a child, while hospitalized at a children's hospital, I witnessed the death of two small brothers who had lead poisoning. I will never forget how hard their father cried. It would be inexcusable -- after all we now know -- for even one more child to be lost or one more parent to bear this agony,

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Naomi Nachun
2505 NE 57th St.
Suite 540
Seattle, WA 98105

From: Bruce Nash
Sent: Wednesday, October 01, 2008 3:34:44 AM
To: Davies, Holly (ECY)
Subject: Draft Lead CAP

Attachments: oledata.mso

Removing lead based ammunition would have an adverse effect on Law Enforcement. It is the lead in our bullets that allows them to expand and not penetrate the intended target. Also there would be an increased expense on city, county and state governments to try and substitute another non lead based ammunition. In this time of high fuel costs we don't need another unneeded increase.

Sgt. Bruce Nash
East Wenatchee Police Department
271 9th Street NE
East Wenatchee, WA 98802

Non-Emergency Business: (509) 884-9511
FAX: (509) 886-6114
BNash@eastwenatcheepolice.com



_____ Information from ESET NOD32 Antivirus, version of virus signature database 3483
(20080930) _____

The message was checked by ESET NOD32 Antivirus.

<http://www.eset.com>

From: Diane Nash-McFeron
Sent: Thursday, October 02, 2008 2:11:37 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Diane Nash-McFeron
2923 NE 199th Street
Lynnwood, WA 98036

(206) 365-0643

From: Brent Naylor
Sent: Thursday, October 02, 2008 10:56:55 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Would you want to have lead in your diet?

Sincerely,

Brent Naylor
981 State ST
Raymond, WA 98577

(360) 942-3409

From: Brad Nelson
Sent: Monday, October 06, 2008 7:43:41 AM
To: Davies, Holly (ECY)
Subject: Lead chemical action plan

Holly Davies, Dept. of Ecology

RE: Lead Chemical Action Plan

Ms. Davies,

With all due respect to what your department states it is doing to protect the public, I must take exception to the focus on Lead Ammunition. The very existence of the study was unknown to me, an avid shooter until today. This reeks of government secrecy and an attempt via "the back door" to outlaw a component of ammunition that has been in common use for well over three hundred years.

Ms. Davies, I live in a rural area. Just two weeks ago an intoxicated driver followed my daughter-in-law to my home and blocked her in with his vehicle. I was able to turn off his vehicle and take his keys, and call 911 for law enforcement to come to the scene and arrest him. For thirty minutes I, 62 years of age and recovering from total replacement of both knees, waited for law enforcement to arrive. I am a former member of law enforcement and have a current CCW permit and luckily I was armed at the time of this incident. For the thirty minutes I waited for the officers to arrive I endured profanity and threats since I refused to return the keys to the drunk, which would have allowed him to leave with the very real possibility of killing not only himself but possibly some of "YOUR" loved ones as well. He got on his cell phone and was seeking friends to come and help him overpower me and take back his keys. The law enforcement officers arrived before any of the drunk's friends. Luckily I did not have to let the drunk know that I was armed.

Ms. Davies, had your proposed ban on lead ammunition been if force I would not have had the availability of ammunition to be in practice and confident of being able to protect myself and my family. The proposal, while sounding good on the surface, seems to me to be no more than a secretive attempt to disarm law abiding citizens and leave us at the mercy of various thugs and drunks. This is something the legislature, congress and supreme court have refused to do, as it is unconstitutional.

If your agency is so paranoid of the miniscule amount of lead entering the environment from defensive and sporting firearm use, at least wait until YOUR AGENCY PROVIDES ANOTHER SUBSTANCE AS USEFUL AND ECONOMICAL AS LEAD for use in ammunition. In case you missed it, lead is

one of the elements that naturally occurs on this earth. Why not go a step further in absurdity and mine it all and send it to the moon?

Best Regards, Brad Nelson P.O. Box 11, Royal City,
WA. 99357 bnelson@smwireless.net

From: Iral Nelson
Sent: Monday, October 06, 2008 3:26:26 AM
To: Davies, Holly (ECY)
Subject: Comments Draft Lead CAP

Dear Ms. Davies,

The following remarks address some of my concerns with the "lead in firearms ammunition" portion of the subject document. I am not a hunter or fisherman, but have an interest in firearms and freedom from excessive government regulations of any sort (Jeffersonian, as it were). Albeit, your team is to be commended for its comprehensive efforts to address health risks from the use of lead.

To begin with I suggest that focus be sharpened in the presentation; the material seems to ramble in and out of problems associated with lead in waterfowl ammunition which really is no longer a problems as it has been replace by steel shot. (It appears that steel shot applies only to waterfowl and I wonder why it is not applicable to upland fowl as well.) It rather seems that some statements are simply inflammatory and are have no appreciable quantitative basis.

Suggest that Rather than Fishing, Hunting, and Shooting, the section be split into Fishing and Firearms where the latter can be split further into shot shell ammunition and solid ammunition. The former, save for upland fowl, has been solved with steel shot. The latter applies to firearms in general, including reloading, hunting, target practice, recreational plinking, competitive shooting, and law enforcement, each of which should be addressed separately. What is the apparent problem and how can it be quantitatively established (with well established studies not isolated anecdotes).

I have not mentioned alternatives to the use of lead in solid bullets as I have yet to be convinced there is a need to change present usage.

Thank you for the opportunity to comment on this important issue.

Iral Nelson
Richland, WA
52-yr WA voter

P.S. A personal anecdote: as a child of about 11 years I received an outfit for making lead toy soldiers. Consisted of an electric heater, ladle, and two mold halves. Each casting would yield a foot soldier and a cavalryman. Such outfits probably wouldn't sell very well these days....

From: MikeN54@aol.com
Sent: Saturday, October 04, 2008 12:14:33 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Ms. Davies,

Please accept my comments as being against the proposed Lead Chemical Action Plan. Lead is a simple element, it is natural, and in various quantities it is all around us. We use lead in so many and varied ways without danger. It is in our cars, on the battery cables and in the wheel balancing weights. For years it was used to seal our windows and our plumbing fixtures. In the plumbing it is no longer used, being replaced already by better and cleaner sealants. Where the use of lead has become obsolete, it is already gone or not renewed.

For bullets in sport shooting, lead has no real comparison. Our police use it in their target shooting (and they do need the practice).

The main area where lead should not be used is near and in our waterways where migratory duck and goose hunting is popular. But in those areas the use of lead birdshot is already banned and under Federal control. Good reasons for the ban of lead shot in or along those water ways is the amount of lead used in the shotguns with each shot, usually an ounce or more, and the accumulation of the shot in the confined areas near the water. Once again, that is already under Federal control.

Washington State does not have a good reason for a ban on the use of lead. The use of this element by sportsmen and target shooters is only a very minor portion of the lead found in general use along and within other avenues. Thank you,

Mike Nesbitt
P.O. Box 2913
Olympia, WA 98507

miken54@aol.com

Looking for simple solutions to your real-life financial challenges? [Check out WalletPop for the latest news and information, tips and calculators.](#)

From: thuy vi nguyen
Sent: Monday, October 06, 2008 4:01:12 PM
To: Davies, Holly (ECY)
Subject: lead

hello holly,

is there going to be another meeting for the lead chemical action plan?

vi nguyen

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From: Gary and Ronda
Sent: Monday, September 29, 2008 12:25:40 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan comments

You should only consider areas of large concentrations of lead, the amount of lead that is released from sport hunting and target shooting should not be considered. And if you must continue with this effort please exclude Eastern Washington from your efforts to control everything.

Sincerely, Gary Nielsen

838 hwy 20 east

Colville, Washington 99114

From: digitalnoas

Sent: Sunday, October 05, 2008 10:57:21 PM

To: Davies, Holly (ECY)

Subject: Lead Chemical Action Plan

I wish to state my disapproval of the proposal to list lead ammunition in the Lead CAP. I know that you have a paper stating that you are not planning to ban lead ammunition, that the CAP only makes recommendation, but the very fact that you plan on listing lead ammunition and make recommendations as to its use, is a slippery slope which I believe will only lead to banning lead ammunition in the future. It is my understanding that there is no adequate substitute for lead ammunition and that any affects on humans and wildlife do not justify a ban as recommended by the Department of Ecology.

Thank you for reading my email

Ralph Noa
3850 12th PL NE
Lake Stevens, WA 98258

From: Ruben Nolf

Sent: Friday, September 26, 2008 5:16:59 AM

To: Davies, Holly (ECY)

Subject: Lead Ammunition Ban

Holly Davies, Dep of Ecology. Olympia, Wa. I am a taxpayer and have hunted most of my early life in the state of Wash. and am 100% against this push to stop sales of lead ammunition in this state. We do not need to follow the actions of the communist state of California. Ruben C. Nolf, Vancouver, Wa. 98684.

From: mary & Dave north
Sent: Thursday, September 18, 2008 10:34:23 PM
To: Davies, Holly (ECY); mjnorth70@hotmail.com
Subject: Lead ammunition ban in state of Washington

A ban on lead based ammunition would be morally inept given the alternatives to lead, we need to ban cars because they kill people too,
Please, this still is not california but with a little more help from bureaucratic agencies it just might start to be Nocal!

I am a hunter and fisherman and I do see a need for using an alternative projectile in waterfowl hunting due to the nature of the animals, but for all other uses there is NO other substitute.

By the same rationale we should ban fish from the public as toxic with lead.

Information and facts can and are bent to benefit any particular agenda especially by government.

Thank you, Dave and Mary North

From: Marilyn Oakland
Sent: Tuesday, September 23, 2008 6:45:04 AM
To: Davies, Holly (ECY)
Subject: lead chemical action plan

Hi Holly,
Please put my name on the list as against the Draft Lead CAP as a sportsman who hunts and fishes with lead components. Thanks for your time.
Jeff Oakland
mudnfud@ndsupernet.com

From: maura obrien
Sent: Friday, October 03, 2008 5:20:05 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

maura obrien
3190 - 160th Ave SE
Suite 540
Bellevue, WA 98004

From: Michael O'Brien
Sent: Thursday, October 02, 2008 10:47:19 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Michael O'Brien
18214 W Spring Lake Dr SE
Renton, WA 98058-0604

From: Erin Ocegueda - RN,BSN
Sent: Thursday, October 02, 2008 7:58:35 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Erin Ocegueda - RN,BSN
512 Darby Dr. #308
Bellingham, WA 98226

From: Sharon O'Hara
Sent: Thursday, October 02, 2008 9:56:34 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express dismay that a strong Lead Chemical Action Plan is not already in place for our kids.

Increasing hyperactivity in children is but one example of leads toxic result that affects our children.

One example to prove the urgency:

Hyperactivity and drugging children is increasing and one recent study proves out the case excess lead in children is a real problem.

<http://www.pubmedcentral.nih.gov/articlerender.fcgi?artid=1475115>

... " ...

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendation to eliminate lead exposure to children in housing, the plan is not enough and should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products, including fillers and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State a leading advocate for no nonsense product protection for our kids, public health and the environment from toxic chemicals. Protecting our kids now protects their future and our state wellness.

Sincerely,

Sharon O'Hara
7477 Mountain Vista Lane
Silverdale, WA 98383

(360) 337-1454

From: David Ojima
Sent: Friday, September 26, 2008 4:49:13 AM
To: Davies, Holly (ECY)
Subject: Lead Shot for Shotguns

I hunt pheasants in Western WA in fields which don't require non-lead shot and hope the law does not change. Lead is much cheaper, more effective, easier on the shotgun barrel. I can see where non-lead shot should be required such as in wet lands or lakes/ponds, but for forested clearcuts, lead shot should not be an environmental concern. Please do not change the law.

Dave Ojima

From: Tom Olsen
Sent: Tuesday, September 30, 2008 8:25:33 AM
To: Davies, Holly (ECY)
Subject: Lead CAP Proposal

As a Washington resident who enjoys shooting sports, I'm writing to oppose inclusion of firearms ammunition in proposed limits on lead use. Lead birdshot is already banned from use in those instances where waterfowl can be harmed by ingesting spent shot from shallow water. With the exception of shooting ranges, any other spent lead birdshot (or solid bullets from rifles and pistols) is very widely disbursed and very unlikely to represent a hazard.

Lead concentrations in shooting ranges are managed relatively easily and, in fact, frequently are "mined" for reuse and recycling.

No alternative to lead is available for very widely used .22 caliber firearms, and virtually all copper-jacketed bullets for larger caliber firearms have lead cores.

Older shotguns – very many of which are still in use – and all rifles and pistols of which I am aware cannot use projectiles without at least a lead core. (Some military firearms can use exotic-material projectiles like depleted uranium, but there is none of this capability in civilian arms.)

If adopted, a ban of lead-containing ammunition would elicit contempt for, and distrust of, state government, and in the final analysis be difficult to enforce. Lead is available from many sources – discarded tire balance weights and fishing sinkers, for example – and is easily smelted and molded. In my experience as a competitive shooter, relatively few shooters currently go to the trouble of casting their own bullets, but it isn't very hard to do.

In sum, if a ban of lead-containing ammunition is honored it would effectively obsolete virtually all firearms in Washington resident's possession. But perhaps this is the hidden intent of this regulatory proposal?

I strongly urge exclusion of firearms ammunition from proposed lead regulations.

Tom Olsen
2024 Falcon Court
Bellingham, WA 98229
GPS N 48° 42.773' W 122° 27.677'
Phone 360.647.1223
Email tom.olsen@comcast.net

From: Tonkinater@aol.com
Sent: Thursday, September 18, 2008 4:54:25 AM
To: Davies, Holly (ECY)
Subject: Re: Lead Chemical Action Plan

I read that and I stand by my earlier statements. You've created a "marvelous" plan for problem that doesn't exist! Where are your study figures & counts of all the dead animals including autopsies to show they were indeed killed by lead poisoning ? I see these wonderful attempts to save the world from lead based ammunition but I don't see the proof this is a problem. What I see and I imagine a lot of others will see is a lead ammunition ban that didn't work 30 PLUS years ago and now you want even more.

Please include my comments for the record.

Keith M. Olson
Federal Police Supply

In a message dated 9/17/2008 12:45:55 P.M. Pacific Daylight Time, hdav461@ECY.WA.GOV writes:

Thank you for sending in your comments on the Draft Lead CAP. There is no proposed ban on lead ammunition in the Draft Lead CAP and we have heard from many people about an opposition to a ban in the future. We would like to work with hunters and shooters to promote non-toxic alternatives to lead without negatively affecting hunting or shooting areas.

The CAP attempts to look at the total picture of all sources of lead. Our priority is preventing lead exposure in children and helping children who already have elevated blood lead levels. We want to do this by focusing on the largest known risk factors, such as lead-based paint and plumbing in older homes.

Please take a look at the fact sheet we prepared about lead ammunition and the Draft Lead CAP. I've attached the fact sheet to this email or you can access it at:

<http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/>

Sincerely,

Holly Davies, PhD
Chemical Action Plan Developer
SWFAP/ Industrial
WA Department of Ecology
PO Box 47600
Olympia, WA 98504-7600
Phone: 360.407.7398
Fax: 360.407.6102

From: Tonkinater@aol.com [mailto:Tonkinater@aol.com]
Sent: Wednesday, September 17, 2008 12:34 PM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Dear Ms. Davies-

I fear this so called study will degenerate into a lead based ammunition ban attempt. Let's look at previous studies which resulted in lead shot bans in shotgun shells. These were done decades ago and to date waterfowl continue to have problems to this day. Leftovers from an bygone era? No, they're getting it from some other source, perhaps another country to the south of us that allows LEAD based shot!

Lead in minorities is higher? Probably so, but that is due in part to living conditions where minorities live in older dwellings which still have lead based solder in their plumbing systems. Duh! If you want to do something valuable then make landlords repair plumbing systems to eliminate lead based solder.

So don't let your new "study" slide down the slippery slope into a back door ban on lead ammunition used in hunting and shooting sports. We'll be watching very carefully to make sure this does not happen I promise.

/s/ Keith M. Olson

Federal Police Supply

Psssst...Have you heard the news? There's a new fashion blog, plus the latest fall trends and hair styles at StyleList.com.

Psssst...Have you heard the news? There's a new fashion blog, plus the latest fall trends and hair styles at StyleList.com.

From: Lynne Olson
Sent: Thursday, October 02, 2008 10:43:40 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Lynne Olson
3426 W Lk Samm Pkwy NE
Redmond, WA 98052-5907

(425) 885-6663

From: Joy Onasch
Sent: Friday, October 03, 2008 1:20:57 AM
To: Davies, Holly (ECY)
CC: 'Mark Pokras'
Subject: Comments for Draft Lead Chemical Action Plan

Hello Holly-
I've just taken a quick look at the draft report on-line and would like to offer two edits/comments.

- 1) On page 98 alternatives to lead fishing weights are listed. In addition to the materials listed, there are also ceramic and natural stone weights available. We have been working with anglers in MA to convert to non-lead materials and we have distributed ceramic samples from Big Ben Tackle in Latrobe PA and the Wampanoag Tribe on Martha's Vineyard is distributing natural stone weights made by Pallatrax (in the UK and now in the US). I'm happy to provide more info on these alternatives if you are interested, but thought at least those materials could be listed in the report.
- 2) On page 106 the legislation on lead fishing weights is noted. In MA, lead fishing weights are banned on two large reservoirs (the Wachusett and Quabbin). Citation for legislation is at 321 CMR 4.01(4)(i). http://www.mass.gov/dfwele/dfw/regulations/cmr/cmr_400.htm

This report is great work and I look forward to having the final copy to use as reference and in efforts to get lead out of MA fishing.
http://www.turi.org/community/lead_in_fishing

Thanks!
Joy

Joy Onasch, Community Program Manager
Toxics Use Reduction Institute
University of Massachusetts Lowell
One University Ave.
Lowell, MA 01854
phone: 978-934-4343
fax: 978-934-3050
email: joy@turi.org
web: www.turi.org

From: MICHAEL ORSKOG
Sent: Sunday, September 21, 2008 11:29:19 AM
To: Davies, Holly (ECY)
Subject: Lead chemical action plan

Please, lead bullets are no threat to the public on gun ranges. Clean up is not that difficult. We have been salvaging the lead for years at our range and sell it to the scrap yard and it pays for the clean up. We shooters see this for what it is, a way to drive prices of bullets so high that no one can afford to enjoy this sport. There are many other problem areas that deserve attention, lead bullets is not one of them.

From: Marcus Ortiz
Sent: Thursday, September 18, 2008 1:20:11 PM
To: Davies, Holly (ECY)
Subject: The Draft Lead Chemical Action Plan...

Dear Holly Davies,

I am writing to oppose the Draft Lead Chemical Action Plan. I consider it the people's right use whatever chemicals they see fit to. Seeing as this plan affects lead ammunition, it unfortunately infringes upon the People's constitutional right to keep and bear arms. I am respectfully asking you to oppose this plan.

Sincerely,

Marcus Ortiz

From: susan overback
Sent: Thursday, October 02, 2008 10:37:18 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

susan overback
5324 SW ILLINOIS
PORTLAND, OR 97221

From: Michael Overfield
Sent: Thursday, September 18, 2008 1:25:46 PM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Ms. Davies,

I understand you authored a draft plan on lead reduction. I read through your report, I have the following questions and concerns:

- Page 29 shows lowering lead blood levels, what is the basis for concern when the trend is going in the right direction?
- The study references the lead shot as a cause for the endangerment of the Bald Eagle, why then has the population been going up and has now been removed from the endangered species list?
- In referring to lead shot effects on birds and animals, the data is pretty unclear, and there are repeated use of terms like "many" but no specific data is given. Is there a crisis of animals dying from lead shot?
- In referring to the California Condor, it seems that the death of 3 birds from lead created a big stir, that is 75% of the deaths, and the other 7 birds were OK? Does this constitute a real concern?
- Page 231 indicates the lead based ammunition should be banned at shooting ranges. Have there been ANY documented cases of exposure or death associated with shooting ranges that would justify this drastic step?
- There is an unclear cost estimate on the lead ammo ban, the data only addresses the cost of lead shot ammunition, but the ban appears to indicate other types of ammunition would also be banned (what good is it if you can't use it at any range). From your data, it appears the cost of substitute bullets will increase ammunition cost by about 400%.
- Page 105 talks about 619 tons of lead from lead shot ammunition, but the basis of this estimate is far from reliable. The basis is from data of ALL ammunition that uses lead. Lead shot is only PART of that total. Then there is no way to measure how much is dispersed to the environment and how much is retained and recycled from modern environmentally considerate shooting ranges. The 600 ton number just can not be directly connected to environmental release. Additionally much of the ammo is likely not used and stocked in inventory by a growing population. It is NOT all released to the environment.
- Page 237 seems to begin with analysis of how we are all getting dumber and dying sooner, but average life expectancy is at an all time high. We are

still producing intelligent people that are developing advanced technology. This observation seems to counter the doom and gloom assessment of lowering IQ and more health problems mentioned in this section.

- Page 50 calls into question methodology, when it uses "unknown then, "most likely" from lead shot. This seems to be far from objective and could be interpreted as a bias.

I appreciate your exhaustive work on this subject; it is clear there are some areas of concern, particularly lead paint in homes. With that said I'm very skeptical of the concern for lead bullets and lead shot. It seems that existing regulations on lead shot have been effective where required. There have been no documented issues listed in your report of problems at properly operated shooting ranges. I do not see a rational argument to ban the use of lead ammunition at shooting ranges and to elevate the cost of ammunition by about 400% and to reduce the effectiveness and shelf life at the same time.

I would encourage you to look at this, and focus efforts on lead controls where they have documented issues and will have the greatest effect. The issue of lead bullets will have little if any effect and will create intense scrutiny of your otherwise worthy efforts to reduce environmental lead levels.

Thank you for your time. Feel free to contact me if you need any further explanation or clarification.

Respectfully,

Michael Overfield

overfieldmr@msn.com

(360) 649-3555

From: RedWolf

Sent: Tuesday, September 30, 2008 12:12:57 PM

To: Davies, Holly (ECY)

Subject: Lead Chemical Action Plan

Dear Holly Davies,

In California, July 1, 2008, a lead ban has been in effect, for the California Condor.

In every chance, lead was blamed. Even though these dumb birds were electrocuted by high tension lines, the reports were still lead induced deaths.

In all instances, no other animal was tested for lead.

It was ONLY the condor. I find this idea of testing flawed on every level ie: Make it look like lead poisoning, where it wasn't lead.

Thank you for reading this.

Sincerely,

Richard Owings/Modesto, CA

PS: Please don't follow California.

From: Webmail rownby
Sent: Thursday, September 18, 2008 4:10:49 AM
To: Davies, Holly (ECY)
Subject: Lead CAP

My comments on the proposed lead CAP:

There is no adequate substitute for lead ammunition and any effects on humans and wildlife do not justify a ban by the Department of Ecology.

Because of this, gun ammunition should not be considered in the lead CAP. Any proposal to ban or restrict ammunition will be vehemently opposed by hunters and outdoorsmen. I would request wording regarding ammunition be removed from the CAP before it goes any further.

Thank you,

Ray Ownby
6321 Rd 3.3 NE
Moses Lake, WA 98837
509-765-3122

From: Robert Pace
Sent: Friday, September 19, 2008 2:28:26 AM
To: Davies, Holly (ECY)
Subject: EPA Chemical Draft Plan

To whom it may concern:

I have a great concern about your draft plan where you could ban all lead bullets, shot from use. I do not believe this should be done as there is no solid proof that it contributes danger to the environment. Lead occurs naturally in the environment and I believe that mining, sewer discharges are a great threat and they should be on top of the list not banning lead bullets, shot. Further there is no good substitute for lead ammunition and they already have banned lead shot for waterfowl hunting. Thank you for allowing my input.

Robert K. Pace
19388 Waukon Rd. N
Edwall, Wa. 99008
509-239-4534 Home
509-714-5025 Mobile

From: Elaine Packard
Sent: Thursday, October 02, 2008 11:57:50 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Elaine Packard
222 31st Ave.
Seattle, WA 98122

206-322-8583

From: Don Paladin
Sent: Thursday, October 02, 2008 10:33:16 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Don Paladin
PO Box 29722
Bellingham, WA 98228

360 734 0487

From: Bernie Panitch
Sent: Monday, September 29, 2008 7:31:48 AM
To: Davies, Holly (ECY)
Subject: Lead bullets

I am totally opposed to banning lead ammunition. Find a suitable substitute for it if you must but allow shooting enthusiasts who currently have large supplies of lead based bullets to exhaust their supply through normal shooting outlets. Lastly, private shooting clubs on private land should be exempted from any ammunition bans.

Bernie Panitch,
Vancouver, Wa.

From: John Paquin
Sent: Tuesday, September 23, 2008 3:32:35 AM
To: Davies, Holly (ECY)
Subject: Lead ammunition

As a competitive airgun target shooter, I am distressed to find that my sport may be effectively banned in this state.

For airgun target shooting there is no replacement for lead ammunition that comes close to matching its performance. The difference in performance is so great, that banning lead ammunition will make the skill of the shooter irrelevant in these contests.

I understand the reason behind this legislation. Lead is a tenacious and devastating poison, and its use needs to be examined closely in all applications.

I would ask, though, that you consider allowing lead ammunition to continue to be used in controlled conditions, such as shooting ranges, providing those facilities make accommodations for proper lead removal.

This would allow competitive shooters like myself to continue to enjoy our sport.

Thank you for your consideration

John Paquin

From: Steve Parcel
Sent: Saturday, October 04, 2008 1:59:54 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Hello,

I strongly object to any ban on lead ammunition beyond the laws that already exist. There is no suitable substitute for lead in projectiles. Further the amount of lead contributed to the environment by lead projectiles is quite insignificant, especially when compared to the naturally occurring lead deposits found in the state. I encourage the advisory committee members not to take action to ban lead in ammunition.

Respectfully

Stephen S. Parcel

I am using the Free version of SPAMfighter for Personal use.
SPAMfighter has removed 1777 of my spam emails to date.
Try [SPAMfighter](#) for free now!

The Trial and Professional version does not have this message in the email

From: Gershon Parent
Sent: Thursday, September 18, 2008 8:43:18 AM
To: Davies, Holly (ECY); gershon@msn.com
Subject: Lead Chemical Action Plan - Feedback

Holly Davies,

I have read the section on ammunition in the Lead Chemical Action Plan prepared by the Department of Ecology. It should be clear that the limited and speculative findings based on many uncertain estimates, artificial experiments, and unsubstantiated claims in that document clearly do not justify a ban on lead ammunition. The report makes frequent reference to other state's regulations as rationale for a ban in Washington. That is negligent thinking and I expect more from this state's leaders than blind following of other state's absurd decision making.

The fact is that there that is no adequate substitute for lead ammunition in terms of performance and price. The factual and established effects affects on humans and wildlife from the lead content in ammunition do not justify a ban. Increased education for those that handle or work in proximity to ammunition could be inferred as a good idea, but that is all. Most supporters of a ban do so regardless of cost, performance, or availability of substitutes thus revealing their lack of knowledge in the area of ammunition and their bias against firearms and ammunition in general.

If you remove all the speculation, all the references to other state's decisions, all the artificial experimental results, and all the extrapolation you would find that the only reasonable recommendation is to not recommend any action in the realm of ammunition.

Sincerely,
Gershon Parent

See how Windows Mobile brings your life together—at home, work, or on the go. [See Now](#)

From: Michael Parker

Sent: Friday, October 03, 2008 12:08:26 PM

To: Davies, Holly (ECY)

Subject: Lead Ammunition

It never continues to amaze me that we spend so much time, money and energy, on drafting laws and regulations that really have little impact on our environment. If we were ingesting lead like plumbing on a regular basis, I can certainly see a health risk. but I don't believe we should inflate this matter greater than it needs to be. Please find a more worthy cause to focus on
Mike Parker / tax payer / voter / and concerned citizen.

From: Veronica Parker
Sent: Thursday, October 02, 2008 8:49:47 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Veronica Parker
919 NW 79th Circle
Suite 540
Vancouver, WA 98665

From: Tamara Parrott
Sent: Sunday, October 05, 2008 9:49:44 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Tamara Parrott
14212 Lisabuela Road SW
Vashon, WA 98070

From: Sharon Parshall
Sent: Friday, October 03, 2008 12:39:20 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I support a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Sharon Parshall
PO Box 593
Suite 540
Fall City , WA 98024

From: Chuck Patten
Sent: Friday, September 26, 2008 1:57:26 AM
To: Davies, Holly (ECY)
Subject: Draft Lead Chemical Action Plan (CAP)

Dear Ms. Davies,

I urge you and the Dept of Ecology to rescind this plan. There is no acceptable or adequate substitute for lead based ammunition. This fact is well known and wishing that it isn't won't solve the problem that the Lead CAP purports to exist. The plan overstates the negative effect of lead in the environment and frankly wastes the time and resources of the Department of Ecology and my taxes when our state is faced with incredible budget shortfalls. This is one area where the budget should be trimmed immediately.

cheers,
chuck...

Charles B. Patten
23340 NE 29th Place
Sammamish, WA 98074-5435

cc: Christine Gregoire

From: Jean Pauley
Sent: Thursday, October 02, 2008 12:35:45 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Jean Pauley
242 32nd Ave.
Seattle, WA 98122

(206) 322-3456

From: julian pavesi
Sent: Thursday, September 18, 2008 10:49:26 AM
To: Davies, Holly (ECY)
Subject: Banning Lead Ammunition-Totally

There is currently no cost effective substitute for lead ammunition. The current effects to human and animal is NOT enough to BAN LEAD AMMO. There are far more important issues you should be addressing in this state then "ultimately" trying to BAN LEAD AMMO AND FIREARMS.

Sincerely, Julian Pavesi; 519 Sapp Road; Sedro Woolley, WA. 98284

From: Steve Pegram
Sent: Thursday, September 18, 2008 7:57:56 AM
To: Davies, Holly (ECY)
Subject: In re: Department of Ecology Lead Chemical Action Plan.

In re: Department of Ecology Lead Chemical Action Plan.

I urge you to strike the sections calling for a ban on lead ammunition. There is NO scientific evidence to support such a ban and NO viable substitute for lead in rifle and pistol ammunition.

Passing this ban is a de facto ban on ammunition in the state of WA.

Please let me know your thoughts on this important matter.

Best regards,

Steve

Get more out of the Web. Learn 10 hidden secrets of Windows Live. [Learn Now](#)

From: Betsy Pendergast
Sent: Thursday, October 02, 2008 7:49:03 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Betsy Pendergast
530 Roosevelt Street
Port Townsend, WA 98368

From: Kim Pendergrass
Sent: Friday, October 03, 2008 6:01:59 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

This email comes to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Thank you for your time and consideration the above.
Sincerely,

Kim Pendergrass
12216 10th Avenue South
Seattle, WA 98168

(206) 723-1980

From: [Beth Anderson](#)
To: [Davies, Holly \(ECY\):](#)
Subject: People of Faith Want to Strengthen Lead Action Plan
Date: Wednesday, October 01, 2008 8:10:57 PM

To: Holly Davies, PhD

Dear Ms. Davies

I am writing, as a person of faith, to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes. We have a moral responsibility to protect our children and all citizens from the dangers of lead poisoning and neurological damage.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.

- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.

- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Beth Anderson
5021 54th Ave S
Seattle, WA 98118

From: Steve Pew

Sent: Friday, September 19, 2008 6:51:40 AM

To: Davies, Holly (ECY); danointhenw@centurytel.net;
office@washingtonarmscollectors.org; thomas.mckiddie@liberty.seanet.com; ilarahq@nrahq.org

Subject: Initial observations of the CAP public review draft Lead ammunition environmental contamination

Dear Holly:

I haven't read the complete report but did read pp 104-106 detailing your assumptions for calculating the amount of lead ammunition used. My first thought is that your "6 rounds per animal" might be revisited. Typically if an animal isn't killed or severely wounded on the first shot there is no time for other shots. An estimate of 2 rounds per animal might be a better assumption. If it takes a hunter 6 shots to kill their prey they would do well to spend more time on the range improving their accuracy. A survey of hunters would provide better data. Secondly, while I don't have any data, (DFO=data free observation) :) my own experience in shooting is that as much as 90% of the ammunition expended by shooters is at a shooting range, either for practice, sighting in scopes or for competition or pleasure shooting. While I can't speak for all ranges, every range I've been to recycles brass and by the very nature of the range design, captures all the lead and often recycles it. Why? Because they are both financially worth the time and effort to reclaim. I suspect that further investigation of the amount of lead that shooters and hunters contribute to environmental pollution is much less than your estimates, as much as 90%-95% less than you estimate. Since the free market price of brass and lead itself provides incentive for recycling, more government regulations may not be needed. If it's not broken, don't fix it. The null hypothesis that lead ammunition is not a problem is worth entertaining.

Granted it's my own opinion at this point but because of the hypothetical discrepancies between our estimates of what happens to lead bullets it certainly warrants further discussion and science before lead ammunition is targeted as a significantly contributing culprit in lead pollution. This in conjunction with the metallurgical fact that the rifled nature of pistols and rifles needing a softer bullet to operate correctly makes alternative bullet composition financially unfeasible at this point. The relative risk of lead bullets contaminating the environment compared to the cost or availability of alternatives is an untenable equation at this point in our technology.

I am very impressed with the thoroughness of your paper and look forward to reading it in its entirety. You are obviously a well trained and talented researcher. I'll be interested to see how you estimate other sources of lead pollution. Thanks for considering another point of view. The beauty of science vs opinion is that science is self correcting if we keep asking better questions and getting better data. The truth may not make us free but it can certainly help us make better decisions and policy.

Please include my comments in the public review process and put them on the record for others to examine and comment. For others copied on this e-mail please feel free to

forward it to others who may wish to comment/disagree/weigh in. This is an important issue for shooters and environmentalists. We are not adversaries.

Steve

From: Anne Phillips
Sent: Thursday, October 02, 2008 8:12:45 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Anne Phillips
3724 Mary Ann Ct SE
Olympia, WA 98501

From: rcpljp@aol.com
Sent: Saturday, October 04, 2008 1:25:06 AM
To: Davies, Holly (ECY)
Subject: lead ban

Dear Holly Davies,

My name is Robert Pierce. I live in Pasco, WA. I have heard of the initiative to ban lead in fishing weights, shotgun ammunition and wheel weights. My family and friends are avid upland bird hunters, sports clay-pigeon shooters and fishermen. I strongly oppose the banning of lead in ammunition and fishing weights in WA State. Please reconsider this initiative. These sports would ultimately suffer greatly in the future if this ban was imposed.

Thank you,
Robert

McCain or Obama? Stay updated on coverage of the Presidential race while you browse - [Download Now!](#)

From: Cynthia Pikoulas
Sent: Thursday, October 02, 2008 9:20:13 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Cynthia Pikoulas
110 Greenwood Drive
Massapequa, NY 11758

From: [Ole Lindbo](#)
To: [Davies, Holly \(ECY\):](#)
Subject: PLEASE.....
Date: Monday, October 06, 2008 8:54:53 AM

Dear Holly Davis,

I received some information recently that a bill is going to be sent to the state legislature to restrict/ban the use and sale of all lead bullets and fishing gear. Please do not let this happen. Government isn't the solution to the problem. Government is the problem. We have bigger things to fix in our economy, domestically and globally than to waist our politicians time on this issue. We all know Lead isn't a good thing, but let's not have the government get involved.

Thank you,

Ole Lindbo
Executive Director
Cascade Valley Senior Living
8400 207th Place NE
Arlington, WA 98223
(360)-435-3222

From: Emanuel Plotnikov

Sent: Thursday, September 18, 2008 6:55:09 AM

To: Davies, Holly (ECY)

Subject: Lead Chemical Action Plan Comments

I'll make this short and save the long written letters for my representatives, but I will not support this proposition and will write my officials that they do the same. I'll also be talking to everyone I know now that I've learned of it.

Emanuel Plotnikov

From: Dave
Sent: Saturday, September 20, 2008 10:46:30 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

First I will say this is nothing more then trying to enact gun control on Washington State Citizens and with the state pre-exemption law and the Washington State Constitution prohibiting lead bullets to make it so expensive to purchase and protects oneself and family.

You idiots tried this with the fishing lead weights and got no where, as there many more tons of lead in the rivers and lakes then in the shooting ranges that people use.

The Department of Ecology and the State of Washington are wasting money on paying you to work for the people, my next letters will be to your bosses.

Stop wasting our money and time for your own personal agenda.

David Poling

From: Mary Porter-Solberg
Sent: Friday, October 03, 2008 6:35:12 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.
- . Ban lead ammunition that is polluting our waterways and wetlands endangering people, birds, and wildlife.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Mary Porter-Solberg
184 Cassie-Boyce Ln.
Sequim, WA 98382

From: Randall Post
Sent: Friday, October 03, 2008 3:10:54 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Randall Post
212 9th.Ave. N.
Algona, WA 98001-4323

(253) 931-0680

From: Rob Potter
Sent: Saturday, September 20, 2008 2:09:46 AM
To: Davies, Holly (ECY)
Subject: Lead chemical action plan

I feel very strongly opposed to this action. Please take my opinion seriously and place me as a negative to this proposal. Thank you,

Rob Potter
Nighthawk Custom
Account Manager
1-360-286-4858
robnighthawk@wavecable.com

From: Gary Powell
Sent: Friday, October 03, 2008 5:39:23 AM
To: Davies, Holly (ECY)
Subject: Lead ban

To Whom it may concern,

I wish to express my wish that the ban on lead in ammunition used in Washington state is not necessary and needs to be abandoned altogether.

The hunting community would be essentially shut down and local communities would suffer unnecessary financial hardship in these times of recession we are already enduring.

There is currently not an acceptable substitute for modern or primitive ammunition that doesn't use lead in their projectiles and this would, in effect, end shooting and hunting in our state causing our economic recession to continue unnecessarily.

There is no scientific proof lead from ammunition is causing environmental degradation to the level that if lead ammunition was banned that there would not be the same levels found in our land that we now find.

Please discontinue this misguided effort to ban lead from ammunition and follow sound principles of science and not emotional feelings that are not founded on reason and established facts.

Thank you for your consideration of my views.

V/R,
Gary Powell
8075 Daniel Place NW
Silverdale, WA. 98383
(360) 613-5636

From: Kendra Powell
Sent: Thursday, October 02, 2008 8:08:13 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Kendra Powell
1004 W 14th
Spokane, WA 99204

From: Nicole Powell
Sent: Thursday, October 02, 2008 7:16:09 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Nicole Powell
428 S Hemlock St
Apartment D
Spokane, WA 99201

From: Tl Powell
Sent: Sunday, October 05, 2008 9:14:57 PM
To: Davies, Holly (ECY)
Subject: Draft Lead Chem. Action Plan

Holly Davies DOE

Subject: "Public Comment on the Draft Lead Ammunition Action Plan"

I wish to state my opinion that the proposed ban on lead is a bad idea. There are no acceptable alternatives to lead and the miniscule safety issue for humans and wildlife does not warrant a ban.

thank you
Terrance L Powell
27525 Q Lane
Ocean Park, Wa. 98640

From: george poysky

Sent: Thursday, September 18, 2008 3:37:37 AM

To: Davies, Holly (ECY)

Subject: lead ammunition ban

there is no replacement for most of what you want to ban. i would say your agency is just another division of sara brady. lets get real hopefully we will get a new governor in november and maybe he will trounce a bunch of you left wing radicals geo poysky III

From: Chuck Prater
Sent: Friday, September 19, 2008 6:32:48 AM
To: Davies, Holly (ECY)
Subject: Lead Ammunition

I understand your concern over lead in the environment, but I believe banning lead ammunition is more about gun control than it is about real damage to the environment.

As an active target shooter (rifle and handgun) I frequently visit both indoor and outdoor shooting ranges. All the indoor ranges I've visited in recent years require FMJ ammunition and along with backstops designed to limit exposure. All have robust ventilation and lead recover procedures. I see no issues with indoor shooting ranges where environment lead exposure could not be mitigated by adherence to industry best practices. As to outdoor ranges additional work/ regulation may be warranted, but a ban on lead ammunition certain is not the only solution nor even a good solution. Banning lead ammunition is proposing to swat a fly with a sledge hammer. To eliminate a miniscule problem it appears your willing to destroy the entire sport of outdoor target shooting as well as hunting. I find it challenging to believe that within the state there is no place left where the minimal impact of lead ammunition used for target shooting and hunting is threatening the existence of life as we know it.

All endeavors involve some risk. To me the environmental risk presented by lead ammunition does not trump:

1. The freedom to exercise our Second Amendment. My research indicates that most proposals to restrict, ban or tag ammunition are nothing more than attempts impose roundabout gun control. I'm sure your motives are pure, but the result will be the same. The methodology will just be different - gun control through environmental regulations.
2. My ability to participate in my favorite sport.

Finally, if gun control is not your motive then please consider the following. I'm unaware of any viable alternative to lead ammunition for rifles and handguns. Until such time when viable alternative ammunition (similar performance) is readily available and at a comparable cost I request you shelve any regulations that limit the use of lead ammunition for handgun and rifles. I would support outdoor range protocols to limit environmental exposure to lead if they are developed in conjunction with the shooting industry.

Chuck Prater

From: Steve Prentice

Sent: Friday, September 19, 2008 2:41:52 AM

To: Davies, Holly (ECY)

CC: victorvjohnson@yahoo.com; 'Chadwick Markel'; 'Dave Abbott'; 'Lemieux, Fran'

Subject: Lead Ban in Ammunition

Dear Ms. Davies;

I am writing you to voice my opposition to banning lead ammunition. There is no Scientific evidence that lead based ammunition is a the culprit of lead toxicity to the public or anything else. Lead is a natural element. Poisoning is based on constant exposure at high levels over an extended period of time and that source can be scientifically traced. i.e. lead based paints, lead in solder used in plumbing/construction, fumes from smelters, mining operations and inadequate disposal of wastes from industrial sources

The banning of lead based shot from waterfowl hunting was based on shoddy scientific methodology, documentation and assumptions.

I urge you to stay with the facts not some other hidden agenda.

Sincerely;

Steve Prentice
29707 So. 959. PRSE
Kennewick, WA 99338
509.627.2880 eves
509.948.0266 daytime

From: Jason Preston
Sent: Friday, September 26, 2008 1:56:24 AM
To: Davies, Holly (ECY)
Subject: Lead Ammunition

I have two comments/questions regarding the CAP.

From the Fact Sheet regarding ammunition: "Non-toxic alternatives to lead ammunition are now available in most places." What are these alternatives and what do they cost? What are most places?

Also, not all ammunition comes in direct contact with animals; what about that ammunition that is used at gun ranges which have a contained impact area?

Thanks,
Jason

--

The statistics on sanity are that one out of every four Americans is suffering from some form of mental illness. Think of your three best friends. If they're okay, then it's you.

From: Stephanie Priest
Sent: Thursday, October 02, 2008 7:07:06 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Stephanie Priest
15719 - 126th Ave. NE
Suite 540
Woodinville, WA 98072

From: Janet Primomo
Sent: Monday, October 06, 2008 9:32:06 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan for our state.
I

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead need not be in the air we breathe, food we eat, water we drink, or products we bring into our homes. I am particularly concerned about vulnerable populations such as children and pregnant women.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,
Janet Primomo, RN, PhD

Janet Primomo
1710 Palm Ave SW
Seattle, WA 98116

From: pam pritzl
Sent: Monday, October 06, 2008 4:29:46 AM
To: Davies, Holly (ECY)
Subject: Cap on Lead

To the Dept of Ecology:

I support the end of the use of lead for ammunition. There are alternatives for most ammunition and I support a phase out with strong public education on the topic. I also support the end of lead in fishing sinkers to save loons. I am not a hunter, but an avid bird watcher.

Pam Pritzl
Camano Island, WA

From: Craig Probst
Sent: Saturday, September 20, 2008 5:59:29 AM
To: Davies, Holly (ECY)
Subject: Lead Action Plan

Dear. MS. Davis;

I see this "Lead Chemical Action Plan" as something too over done and extreme in its overall objective.

Craig Probst

From: Chelsey Putera
Sent: Friday, October 03, 2008 2:34:33 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Chelsey Putera
14534 37th Ave
Seattle, WA 98155

From: Dispatch
Sent: Saturday, September 20, 2008 5:50:45 AM
To: Davies, Holly (ECY)
Subject: Lead Ammunition

Lead (and other "harmful" elements) have been around for many centuries. There are limited documented illnesses from (over)exposure to these substances. Harmful effects may occur only at a limited moment of contact in the environment with these substances - the impact of the bullet traveling at a high rate of speed creating high temperature and "dusting" of the element, for example.

Lead was mined in northwestern Illinois (Galena) for years and human and animal populations thrived so lead is not harmful by and large.

"Studies" are published about how harmful lead is (and can be in infants/youngsters) who put everything in their mouths including toys made in China (now that they are imported huge amounts of lead in order to export those products back to us).

Donated venison programs are now in jeopardy because somebody says that CT scans done by them show large amounts of this meat is polluted by lead fragments from bullets. Other people performed similar studies as a result of this report, only to find the results in conflict with this biased authors reported findings! The author skewed his statistics and was found to have ulterior motives!

Have fowl been found dead with lead fragments in them - yes. Was this really the cause of their death?

Too much of a good thing is BAD! Restricting the use of lead is an example of going too far. Let's just ban all firearms and issue clubs and spears like we had eons ago. Let's also banned GMO foods, all pharmaceutical (except antibiotics) because "heartburn" will go away as will hot flashes, menstrual cramps and hemorrhoids). I truly hope that honesty and good science is used to evaluate the outcome. I am skeptical though.

LCP

Check out my new web site
www.YourStrongBones.com
Lawrence C Pyzik,DC,DACBR

From: Clyde
Sent: Sunday, October 05, 2008 2:50:49 AM
To: Davies, Holly (ECY)
Subject: Lead Ammunition Ban

Dar Sirs,

I am asking you to do further research before considering the proposed lead ban, I read the lead ban cap report, in several areas it contained estimates that were not backed by a in depth study.

This lead ban will put a end to all recreational shooting in Wa.state outside of hunting, Trap, Skeet, Sporting Clays, Cowboy action, virtually all shooting will be stopped due to the prohibitive cost of alternative ammunition.

Currently I pay 5.59 a box for shotgun ammunition containing 25 shells, a ten round box of steel ammo sells for 34.00 a box, a cost of 340.00 for 100 rounds that is required for a single Sporting Clays event, so as you can see, this ban will do what all the anti-gun groups have tried to do for years, eliminate shooting.

Please do not allow this Draconian ban be enacted.

Sincerely,

Clyde Raines MMCM USN Ret. Vietnam Vet
Port Orchard, WA

<http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/>.

From: Mark Ramberg (LCA)
Sent: Friday, September 19, 2008 2:55:16 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

I have recently learned that the Washington State Department of Ecology, as part of the Lead Chemical Action Plan, is proposing to ban lead ammunition in the state of Washington. As an avid hunter and competitive target shooter, I strongly object to this proposal. As an expert shooter and engineer who has studied the issue, I can state unequivocally that there is no adequate substitute for lead ammunition in most sporting venues, police/military uses, or self-defense uses. The exception is steel shot for waterfowl which is already federally mandated. Having read the public review draft of the Plan and the referenced supporting documents, it is clear to me that any affects of lead based ammunition on humans and wildlife do not justify a ban as recommended by the Department of Ecology. I urge the Department of Ecology to reconsider the proposed ban and remove it from the Plan.

Regards,

Mark Ramberg
2408 164th Ave NE
Bellevue, WA 98008

From: Jeff Rambo

Sent: Sunday, September 21, 2008 12:46:11 AM

To: Davies, Holly (ECY)

Subject: Lead ban

This proposal is not based upon valid scientific study. Lead is harm full when in organic compounds, which required substantial chemical reactions. These reactions are not viable in a natural environment. In addition it is highly immobile.

Opposed.

From: Donna Raven
Sent: Thursday, October 02, 2008 1:23:08 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Donna Raven
43 Nello Place
Suite 540
Sequim, WA 98382

From: David Rawson
Sent: Monday, September 22, 2008 8:02:12 AM
To: Davies, Holly (ECY)
CC: Kirt Fredericks; Deanna Miller
Subject: Lead ban? No science to support banning lead ammunition

Ms. Davies

I have been a hunter for 41 years both in the United States and Europe and have studied articles on the lead ban subject.

There are no scientific studies that have determined lead ammunition has caused any harm to wildlife. Lead ammunition is an inert material in the wild.

The only articles I have seen were left leaning animal rights groups and the media who have spread misleading and frankly lies to the public.

This includes the one study that the state of California used to justify their lead ammunition ban law.

This ban would turn law abiding citizens into criminals and cause excessive costs to sport shooters and hunters.

Washington Fish and Game will loose great deal of revenues generated on the sales of sporting goods and hunting licenses and game tags that support wild life conservation programs.

David Rawson
14309 S. State Route 904
Cheney, WA 99004-9037
509 235-4579
DavidRawson@msn.com

From: Michael Ray
Sent: Monday, September 29, 2008 1:54:36 PM
To: Davies, Holly (ECY)
Subject: lead ammunition ban

My comments are - please do not ban lead ammunition. Your fact sheet is nothing more than data made to convince people to support this. I will not support this ban. As a hunter, shooter, and outdoorsman I do not support any restriction on lead ammunition or fishing lures.

Michael Ray
29925 Heimer Road
Arlington WA 98223

From: Vincent W. Reagor
Sent: Friday, October 03, 2008 2:27:25 AM
To: Davies, Holly (ECY)
Subject: comment re.CAP about lead.

Since lead has not been identified as a major problem for the state as a whole why not take your own advice and use existing programs to address known lead problems.(seeCAP,page206 same as p.227 PDF)

See how Windows Mobile brings your life together—at home, work, or on the go. [See Now](#)

From: Jennifer Redwine
Sent: Thursday, October 02, 2008 11:18:52 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes. I have a friend whose three year old son has high levels of lead in his blood.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Jennifer Redwine
18630 NE 59th Court Apt O203
Redmond, WA 98052

From: W REECE
Sent: Saturday, September 20, 2008 7:30:06 AM
To: Davies, Holly (ECY)
Subject: Lead Ban..

Lead Chemical Action Plan :

I was recently made aware that there is a discussion about lead ammo in the possible ban of it in Washington. There is no adequate substitute for lead ammunition and that any affects on humans and wildlife do not justify a ban as recommended by Department of Ecology. Thanks for taking the time to read my email I hope you keep us hunters in mind during the debates. Sincerely William Reece

From: Art Reid
Sent: Thursday, September 18, 2008 1:23:59 PM
To: Davies, Holly (ECY)
Subject: Lead

I would like to point out that WA game department only allows LEAD bullets to be used while hunting with a muzzleloader.

What is the rational for eliminating lead bullets? Seriously !

From: Aardvark Enterprises
Sent: Thursday, September 18, 2008 12:49:30 PM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

I am writing in opposition to the proposed restrictions on the use of lead in ammunition. In addition to the indisputable fact that there is no suitable substitute, there is also the matter of it falling afoul of the constitutional right to keep and bear arms. Outlawing lead would be a blatant violation of that right, and would be a criminal act in and of itself.

F G (Rick) Reitmeyer Aardvark Enterprises
1754 Brothers Lane Poulsbo WA 98370
360-779-5374 aardvarkenterprises@hotmail.com

From: Becky Rhoads
Sent: Thursday, October 02, 2008 2:24:31 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Becky Rhoads
618 NE 148th St.
Vancouver, WA 98685

From: Charles Rice
Sent: Friday, October 03, 2008 2:07:07 PM
To: Davies, Holly (ECY)
Subject: DRAFT Lead Chemical Action Plan

Dear Ms Davies,

The subject plan calls for the eventual ban of all lead ammunition. This is an unnecessary and unjustified elimination of a consumer product having no real impact on the environment, but will certainly have an impact on the hunting industry in the State of Washington. That may be of little concern to the Department of Ecology, but it concerns many of the citizens of this state.

No real linkage has ever been made between lead ammunition and any real lead contamination of the environment.

There is no suitable substitute for lead ammunition.

This is nothing more than a very poorly veiled attempt to control guns in this country by the environmental fanatics.

Hunters and sportsmen have done more and given more of their money and time to the sustainment of the environment than any of the fringe environmentalists.

I have already expressed these sentiments to the Governor's office.

Respectfully,

Charles J & Maudine Rice

From: Clayton Richardson
Sent: Wednesday, October 01, 2008 3:29:03 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Proposing a ban on lead for ammunition is tantamount to destroying the 2nd Amendment to the Constitution and will meet and ultimately be defeated by all righteous, freedom loving, patriotic Americans who know why the 2nd Amendment exist.

Thank you for your time

-cbr

He is no fool who gives up what he
cannot keep to gain what he cannot lose.

From: Donald Richardson
Sent: Thursday, September 18, 2008 3:14:05 PM
To: Davies, Holly (ECY)
Subject: lead

what is your substitute for lead bullets? as there is not one and until there is this is a no go and you will be making voters into criminals as we will still on way or another get ammo (the bozo probation work well to?) and we will work to vote your and or your benefactors out of office.

Donald Richardson
lobo1955@earthlink.net
EarthLink Revolves Around You.

From: galen richardson
Sent: Thursday, September 18, 2008 4:54:03 PM
To: Davies, Holly (ECY)
Subject: lead chemical action plan

just a quick note about this lead chemical action plan. do you people talk with other departments? like the department of fish and wild life, you know, the ones that put out the hunting seasons and regulations, if not you might try doing so or you could pick up a copy at any sporting goods store. i hunt big game and have done so for quite a few years, and i hunt with a muzzle loading firearm, commonly referred to as black powder guns, your attention is directed to the current year regulations, specifically page 67, #2. (b) & (c) according to these regulations lead projectiles are the only projectiles muzzleloader hunters can use. so before you go banning all lead bullets lets get the department of fish and wild life up to speed, get the regulations changed or drop the plan altogether. oh, besides hunting with lead projectiles, i along with several hundred if not thousands of others VOTE, and we're not very happy.

From: GM_ricka

Sent: Thursday, September 18, 2008 11:15:12 AM

To: Davies, Holly (ECY)

Subject: Bad link in <http://www.ecy.wa.gov/pubs/0807025.pdf>

The URL is encoded incorrectly – if you examine the link it's <http://www.ecy.wa.gov/pubs/> not <http://www.ecy.wa.gov/pubs/0807053.pdf> as you intended.

For more

information, visit:

<http://www.ecy.wa.gov/pubs/0807053.pdf>

Contact information:

Also, I received the following from the NRA, which I believe is dishonest.

Lead Ammunition in Jeopardy in Washington State!

Please Stand-Up and Make Your Voice Heard!

The lead ammunition you use for hunting as well as target and competitive shooting will be banned from purchase, use and ownership in the state of Washington if the state's Department of Ecology has its way. Lead ammunition is a target of a series of recommendations in the "Lead Chemical Action Plan" prepared by the Department of Ecology.

The plan is open for public comment until Monday, October 6. The plan and information about submitting comments are available at:

<http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/>.

Lead shot has been banned in waterfowl hunting. Most recently, California passed a law that prohibits hunters from using lead ammunition in areas within the range of the California condor. A symposium was held in June in Boise, Idaho about the effects of lead ammunition on wildlife and humans. Most of the speakers supported a ban on lead ammunition, regardless of the cost, performance, and availability of substitutes. The Department of Ecology plan is yet another effort to remove lead ammunition nationwide.

Please take the time to submit comments to the Department of Ecology and to Governor Chris Gregoire (D).

Let the Governor know that there is no adequate substitute for lead ammunition and that any affects on humans and wildlife do not justify a ban as recommended by her Department of Ecology. Governor Gregoire can be reached by phone at (360) 902-4111, by fax at (360) 753-4110, or click [here](#) to send email. The Governor can also be reached by U.S. Mail at: Governor Chris Gregoire, Office of the Governor, P.O. Box 40002, Olympia, WA 98504-0002.

From: robbnsc@comcast.net
Sent: Tuesday, September 30, 2008 7:22:53 AM
To: Davies, Holly (ECY)
Subject: Lead in Ammunition.

Lead has already been removed from shotgun shells where it was adversely affecting the environment. The amount of lead in pistol and rifle bullets is not sufficient to do much harm to the ecology or to humans. The real issue is lead based paint that is still in the environment and will be for the foreseeable future. All that removing lead from rifle and pistol ammunition will do is make it more expensive. It also will mandate a cleanup and safe disposal of all stocks of all types of rifle and pistol ammunition which will cost the taxpayers for needless regulations.

I want to go on record as being registered voter who opposes removing lead from rifle and pistol ammunition. If you wish to remove lead from all shotgun ammunition fine. That will minimize the problem of environmental lead contamination. However I oppose removing lead from rifle and pistol ammunition as being ineffective and costly to the sporting industry.

Sincerely
Charles D. Robbins
4375 Harborview Drive
Blaine, WA 98230

From: Richard Roberge

Sent: Thursday, September 18, 2008 9:36:47 AM

To: Davies, Holly (ECY)

Subject: Focus on lead

There is no substitute for lead ammunition, and the minimal (if any) affects on humans and animals in no way justify a ban as recommended. This is a thinly veiled attack on 2nd amendment rights, and reeks of partisan politics.

Thank you
Richard Roberge

From: Robert+Julia Kenny+Glover
Sent: Thursday, October 02, 2008 10:33:16 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

We are writing to express our support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Robert+Julia Kenny+Glover
7292 Maxwellton Road
Clinton, WA 98236-8814

(360) 579-3665

From: Rod Robert

Sent: Thursday, September 18, 2008 4:25:17 AM

To: Davies, Holly (ECY)

Subject: ban on lead bullets

I am totally opposed to this ban. First there is no scientific evidence that lead bullets are a hazard and second there is no current replacement for lead bullets. Rod Robert

From: Cal Roberts
Sent: Thursday, October 02, 2008 11:04:12 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes. I want my grandchildren and all grandchildren protected!!!!!! It has been to long coming.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Cal Roberts
504 NE 139th Ave
Vancouver, WA 98684

360 8921985

From: Chenelle Roberts, ND, LM
Sent: Thursday, October 02, 2008 9:23:29 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Chenelle Roberts, ND, LM
6513 4th Ave NE #3
Seattle, WA 98115

From: Douglas Robertson
Sent: Monday, September 22, 2008 8:23:11 AM
To: Davies, Holly (ECY)
Subject: Draft Lead CAP

My comments relate only to the matter of restricting uses of ammunition in Washington.

I understand that the Lead CAP proposes only to limit the use of lead shot, and only to prohibit its use for non-hunting purposes in geographic areas where lead shot already is banned for use in hunting waterfowl and certain game birds. I appreciate that this is, in some respects, a moderate proposal. Nonetheless, I believe that it constitutes something of an over-reaction.

Hunters should practice marksmanship in order to ensure that as few game animals as possible are wounded and lost during actual hunting. Many rounds usually are fired in practice for each round fired at live game. If the cost of those practice rounds is raised precipitously, as would be the result of substitution of non-lead shot for lead shot in practice ammunition, such marksmanship shooting will be sharply curtailed, with bad results. Moreover, shot fired at non-game targets is a negligible threat to wildlife, especially when fired in established shooting facilities (over dry land), and has been shown not to be a significant ground water contaminant. All this should be considered before further restricting the use of lead shot.

Finally, I would insist that any further restrictions on the use of lead shot must include exemptions for the use of lead shot ammunition in lawful self-defense or defense of another, destruction of threatening or rabid animals, emergency signaling, and use by law enforcement and wildlife officials.

Submitted to: Holly Davies
Dept of Ecology
P.O. Box 47600
Olympia, WA 98504-7600
Fax: (360) 407-6102
e-mail: hdav461@ecy.wa.gov

Submitted by: Douglas Robertson
11012 Canyon Rd E Ste 8 PMB 388
Puyallup, WA 98373
e-mail: dr610@hotmail.com

From: Jim Robertson
Sent: Sunday, September 28, 2008 12:02:57 AM
To: Davies, Holly (ECY)
Subject: Lead CAP

Well as a licensed gun owner and shooter and manufacturer of muzzle loading firearms, the prospect of no lead for balls (the most authentic is the round ball) or Minni Balls (civil war era hollow base bullets) is simply not acceptable. The total performance of the firearms is based on the soft properties of lead. An alternate might be gold. Not really feasible. I belong to 2 clubs and the national association, and can state that there are literally hundreds of shooters out here that would be very upset about the loss of the only economical and suitable material for our sport.

We shoot at established ranges with some hunting-check with WDF&W for statistics about muzzleloader hunting. The amount of lead contributed to the environment by these activities is simply not a hazard to the public. The vast majority is contained at ranges, in areas not accessible to the public. Some ranges are actively engaged in reclaiming lead and recycling the material.

This appears to be another over-reaction by government-again.

Jim Robertson
Engineered Solutions
360-482-3315
jdr@engsolpro.com

From: Kristina Rodden
Sent: Tuesday, October 07, 2008 5:28:13 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Kristina Rodden
7760 Hellman Road
Clinton, WA 98236

From: Campbell Rebecca

Sent: Wednesday, October 01, 2008 4:33:42 AM

To: Davies, Holly (ECY)

CC: Rebecca Em Campbell

Subject: Comments to the Washington State Department of Ecology re Lead Proposal Draft

It was most reassuring to visit with the truly sincere and knowledgeable scientists from your agency recently at the Mountaineers Club in Seattle. The hearing topic was your draft lead protocols for the state dealing with toxic lead and its resulting problems and what could be done about them. More could certainly be done with more funding for your worthy agency, and I would certainly applaud that!

I knew alot about the danger of lead paint and of our industrial use of white lead. The latter has ended, although it was helpful for threading tough stainless steels. As a shooter, I also know that lead shot is a real hazard to water fowl; I did not know, however, that lead shot or bullets that lodged in wild animals also threatens condors, who scavenge their carcasses. Bismuth shot should no doubt be more and more used in hunting on both land and water.

While lead is a dangerous neurotoxin, it is even deadlier when compounded with other metals like mercury. There is a negatively synergistic effect of lead combined with mercury that suppresses the excretion of the latter. I wish that I had attended your programs on mercury abatement, since I have suffered serious health problems because of mercury exposure throughout my life.

Did you know that there is a professional organization that promotes the use of toxic mercury within the human body? The American Dental Association bases its policies on mercuric amalgam dental restorations. The present group is actually a renegade organization that displaced one far more ethical in the early 20th century, and receives much of its funding from royalties on mercuric amalgam formulations. It persecutes health practitioners, particularly dentists, who warn of mercury's many dangers and practice protocols to safely remove amalgam fillings.

I strongly suspect that there is collusion between the ADA and the Washington State Health Department via the Dental Quality Assurance Commission. If you sincerely want to minimize the effects of lead within the human body in this state, you will in my opinion need to look into this and expose any unethical collusion between these two bodies if necessary.

Thank you again for your sincerity and for your consideration.

John B. Rodgers
9220 Fauntleroy Way SW
Seattle, WA 98136
wrotironjohn@yahoo.com

(206) 926-3962

From: R C Roos
Sent: Monday, September 22, 2008 1:50:18 PM
To: Davies, Holly (ECY)
Subject: Lead CAP

Ms. Davies;

As I read over the Lead CAP Advisory Council membership, I notice that the interests of millions of firearm owners, hunters, and recreational shooters in Washington State are not represented. I appreciate that fishing interests are represented on the council as "Recreation", but it seems unacceptable to ignore or under-represent such a huge number of citizens and taxpayers.

I oppose banning lead containing ammunition. Metallic lead is a low toxicity form of this naturally occurring and ubiquitous element. Reasonable alternatives do not exist, and environmental risk from metallic lead in bullets is negligible at best. Sweeping prohibition of lead ammunition would harm millions of taxpaying firearm owners, and is not warranted by the resulting infinitesimal decrease in environmental lead exposure.

Sincerely,

Richard Roos
39323 W. Kelly
Benton City, WA 99320

rcroos@bentonrea.com

From: Michael Rosenberg
Sent: Wednesday, October 01, 2008 4:24:25 PM
To: Davies, Holly (ECY)
Subject: FW: comment on Lead Chemical Action Plan

Attachments: AmmunitionFocusSheet.pdf

Dear Holly,

Thank you for your thoughtful response. It is reassuring to know that Ecology is advocating voluntary approach and research as opposed to outright ban on lead ammunition.

I encourage you to continue your efforts towards assessing true costs of replacing lead not only in shotgun shells but also in the handgun and rifle ammunition. While I can't speak for the hunters, I can speak for competitive shooters. Competitive shooting is a sport which requires constant practice with large amounts of ammunition. It is not unusual for a mid-level shooter to expend in excess of 10,000 rounds a year; advanced shooters will require up to 50,000 rounds. At the current prices of metal, cost of bullets has become by far the largest component of the total cost of this sport. To give you an idea, best price one can currently pay for a 9 mm bullet is approximately 6 cents or \$600 per shooter per year. Any action leading to replacement of lead with significantly more expensive metals will likely make this sport prohibitively expensive.

I hope that Ecology will continue conducting careful cost-benefit analysis prior to adopting any enforceable recommendations.

With my best regards,

Michael Rosenberg, PhD

-----Original Message-----

From: Davies, Holly (ECY) [mailto:hdav461@ECY.WA.GOV]
Sent: Tuesday, September 30, 2008 9:17 AM
To: Michael Rosenberg
Subject: RE: comment on Lead Chemical Action Plan

Thank you for sending in your comments on the Draft Lead CAP. Ecology is not proposing a ban on lead ammunition in the Draft Lead CAP. We would like to work with hunters and shooters to promote non-toxic alternatives to lead and reduce releases without negatively affecting hunting or shooting areas. We would invite major ammunition manufacturers to be part of any group looking at voluntary steps. The only action we are recommending is to work with stakeholders to get more information and look at ideas on what would work.

When we contacted major ammunition makers to ask how much lead shot they manufactured each year, they informed us they did not have that information. The USGS has a lot of statistics on the usage of lead in the US, but they do not break down different types of ammunition. They only estimate the total used for ammunition, which is about 60,000 metric tons each year and the second largest use of lead. We tried to figure out how much shot was used for hunting by using data on how many animals are hunted in the WDWF small game reports.

There is a chapter in the Draft CAP on economic analysis of many of the options. Although we did not recommend a ban on any ammunition, we did estimate the cost of switching entirely from lead to non lead shot. We agree that cost is an important factor, along with personal preferences.

We are required to consider all the options and include all the options in the CAP (WAC Chapter 173-333). We have to include a no-action option, an option that results in the phase out of uses and releases, an option to manage the chemical to reduce exposures, and other options such as available substitutes. After considering all the options, we decided to recommend working with stakeholders on voluntary steps.

There is an important correction in Ecology's draft Lead Chemical Action Plan (CAP). On page 233, Recommendation 9, stated "In areas where WDFW has required non-toxic shot, other non-regulated activities such as target shooting and shooting ranges should be prohibited from using lead shot." This language has been deleted. This language was inadvertently left in the draft CAP from a previous draft and is not our recommendation. As we have stated, Ecology does not recommend a ban or regulation of lead in any type of ammunition beyond current law. Our recommendation is to work with WDFW, hunters and shooters in development of voluntary approaches to reducing harm caused by the use of lead shot. The inclusion of the language above is an oversight, and has been removed from the draft CAP, which is currently out for public comment.

Please take a look at the focus sheet we prepared about lead ammunition and the Draft Lead CAP. I've attached the fact sheet to this email or you can access it at:

<http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/>

Sincerely,

Holly Davies, PhD
Chemical Action Plan Developer
SWFAP/ Industrial
WA Department of Ecology
PO Box 47600
Olympia, WA 98504-7600
Phone: 360.407.7398
Fax: 360.407.6102

From: Michael Rosenberg [mailto:mike.rosenberg@comcast.net]

Sent: Monday, September 29, 2008 9:34 PM

To: Davies, Holly (ECY); Gov Comm Office

Subject: comment on Lead Chemical Action Plan

Dear Sir/Madam,

I read with interest your proposal to reduce environment exposure to lead through a variety of measures.

I would like to specifically comment on the part of the proposal as it relates to your recommendation to phase out lead-containing ammunition. I feel that document does not provide sufficient information to judge on the merits of such measure.

1. Lead has been used in ammunition for over thousand years and – for the reasons explained in the proposal – it remains the best and most practical material for this purpose. Other than reference to specific examples of research into lead-free ammunition, proposal does not present any proof or any expert opinions that lead free ammunition is in fact feasible and practicable. I recommend soliciting input from major ammunition manufacturers, who are in best position to comment on the subject.
2. Proposal fails to assess economics of the lead replacement. It concerns me that without such assessment, recommendation to phase out lead ammunition "at any cost" will likely amount to an economic ban of the individual's rights under Second Amendment. It behooves responsible authors of the proposal to assemble and provide such information as essential component of decision making process.
3. I did not find in the proposal any attempt to understand what fraction of the environment lead exposure can be attributed to lead in the ammunition. This deficiency is particularly surprising given how easy it is to produce at least initial assessment. All man-made lead will be eventually absorbed by the environment. Hence, the fraction of lead contamination which is due to ammunition is simply a fraction of total lead production which is used in the ammunition. It is certainly possible to obtain such number; major ammunition manufacturers would be an excellent and easily reachable source of this information.
4. Finally I feel it is important to know what fraction of ammunition-born lead is distributed to police and private citizens in the State as opposed to being used by military. Washington State houses major U.S. military installations which are using lead containing ammunition for training purposes. While it is clear that military uses by far the largest amount of ammunition, it's position on the subject is not known. Proposal refers to certain research which military is starting to conduct in the area of lead free ammunition. However no specific plans, milestones or timelines are presented. WA State Department of Ecology has no jurisdiction over U.S. Armed Forces and it is likely that military located in the State will be exempt from any Department's recommendations. Therefore proposed measure will not affect main users of lead ammunition in the State thus further reducing it's intended impact on the environment.

To summarize, while I sympathize with the honorable cause of the document, I feel that additional research and diligence are required to transform it into actionable proposal. In it's current state, without economic assessment or sound feedback from the industry and military, it would be irresponsible to act on the proposal. While obviously unintended, the Lead Chemical Action Plan is at risk of causing major cultural and economic damage with little if any impact on ecology.

Respectfully,

Michael Rosenberg

From: RAYMOND D ROSENTHAL
Sent: Saturday, September 20, 2008 4:00:22 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

I have heard that lead ammunition could become banned or regulated under this plan. There is already regulation on lead shot in the case of water fowl hunting. I cannot imagine any environmental impact from the firing of lead bullets while rifle hunting or recreational shooting. My feeling is that this is actually an attempt to regulate shooting and has nothing to do with the environment. I am against it.

Respectfully, Dusty Rosenthal
Yakima, WA

From: Savahn Rosinbum
Sent: Friday, October 03, 2008 12:21:50 PM
To: Davies, Holly (ECY)
Subject: PLEASE Strengthen the Lead Action Plan!

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

It is unnecessary for us to be exposed regularly to a well-known toxic substance like lead. It is up to the government to take a strong stance FOR the health of its citizens & this is a great opportunity for our government to enact a policy that will usher businesses into a new era of using safe substances in their products, which ultimately benefits businesses (no lawsuits down the road), citizens (better health!), and government (less money spent on health care). THE STRONGER THE STATEMENT MY GOVERNMENT MAKES AGAINST LEAD, THE BETTER OFF OUR COMMUNITIES ARE. Please strengthen the lead action plan; I trust you and your colleagues to ensure the safety of myself and my children.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Savahn Rosinbum
4234 Sunnyside Ave N
Seattle, WA 98103

From: shane rossen
Sent: Monday, September 22, 2008 2:23:07 PM
To: Davies, Holly (ECY)
Subject:

Holly, my comment concerning lead ammunition is this:

The lead ammunition we use for hunting as well as target and competitive shooting should not be banned from purchase, use and ownership in the state of Washington!

Nor should it be taxed unfairly or outrageously as a means to discourage use of it from a backdoor approach through taxation that includes shipping costs..

Lead shot for waterfowl has and should be banned not anything else..

I do not believe the amount of use of lead for rifle and pistol ammo or bird shot for upland game or target use merits a ban of it's use, purchase or possession.

It would also infringe upon our rights for it's effective use for home and self defense uses of this ammo which should never be tolerated or mandated by any government agency!!

Remember votes of the sportsmen count come election day...

Thanks for the opportunity

Shane Rossen

Founder and President Callers for Christ

E-mail: callersforchrist@yahoo.com

websites:

www.callersforchrist.com

www.northsoundwaterfowl.com

From: Joe Rotter
Sent: Friday, September 19, 2008 11:33:50 PM
To: Davies, Holly (ECY)
CC: Essman
Subject: Lead Ammunition Ban?

Hi Holly,

I am sure that you sorting through a lot of emails at this time, but I wanted to be certain that I expressed my feelings on the Draft Lead CAP. It is an interesting study and I tried to read most of it. Obviously a lot of effort was compiled by many contributing parties, but the mention of banning lead ammunition seems awfully extreme and I wanted to bring up a very critical argument against the idea.

Sportsmen using lead based ammunition are most often firing (with the exception of hunting which is a VERY minimal amount) lead based ammunition in controlled or sterile environments such as organized firing ranges, shooting clubs, or gravel pits where the ecological impact seems to be quite minimal. I think that the idea of banning lead ammunition is far too extreme and there are other alternatives. A large percentage +/- 90% of it could be eliminated from the environment with some simple regulation.

What if there were restrictions on unregulated target shooting with lead bullets, or there were ways to 'clean up' firing ranges periodically? Would this accomplish and mitigate most of the negative environmental impacts without infringing upon the current status of ammunition use and purchase? This could be a win-win for both the environment and gun owners/target shooters. As a hunter and sportsman, I care deeply for the environment but I do feel that an outright ban is too extreme at this point. This will change everything.

I realize that you are probably receiving a lot of email but please read and consider that there are alternatives to accomplishing environmental cleansing without a lead ammo ban. I am concerned that ammunition will become too expensive for young fathers like myself to teach their children how to shoot, handle firearms, hunt, and appreciate the outdoors and art of marksmanship. It is important that this heritage doesn't die without some efforts to fix the problem. An outright ban is not the solution. Please work with us, not against us.

Sincerely and thank you,

Joe Rotter
Ellensburg, WA
509.929.1169

From: Harriet Round
Sent: Friday, October 03, 2008 12:52:58 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Harriet Round
1724 NW 193 ST
Shoreline, WA 98177

From: PAUL RUCKER
Sent: Thursday, October 02, 2008 11:40:29 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

PAUL RUCKER
1426 South Jackson Street
Seattle, WA 98144

From: bill rupp
Sent: Thursday, September 25, 2008 10:58:21 PM
To: Davies, Holly (ECY)
Subject: Lead Ban in Ammunition

I am OPPOSED to any legislation that would ban the use of lead in ammunition.
Thank you,
Bill Rupp
36214 S. 2099 PRSE
Kennewick, WA 99337
509.586.4158

See how Windows Mobile brings your life together—at home, work, or on the go. [See Now](#)

From: randolph russell
Sent: Monday, October 06, 2008 1:57:25 AM
To: Davies, Holly (ECY)
Subject: Strengthen the Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I would like a stronger Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

randolph russell
14415 e, valleyway
spokane, WA 99216

509.999.6374

From: D & B Russie

Sent: Tuesday, September 23, 2008 10:20:06 AM

To: Davies, Holly (ECY)

Subject: lead ban

As a retired Patrolman, Secretary of the Washington State Police Pistol Association and competition pistol shooter I OPPOSE the Department of Ecology Publication No. 08-07-009, "Washington State Lead Chemical Action Plan which proposes the ban of lead used in ammunition and fishing weights in Washington State.

I OPPOSE any new regulations that would ban the purchase, use and ownership of any lead ammunition used for hunting, target and competitive shooting in Washington State.

There is no adequate substitute for lead ammunition and that any affects on humans and wildlife do not justify a ban as recommended by the Washington State Department of Ecology.

Daniel A. Russie
2709 Rose Street
West Richland, Wa. 99353
509-967-5231
Russie4@gte.net

From: Tom and Susan Ryan
Sent: Thursday, September 18, 2008 8:11:04 AM
To: Davies, Holly (ECY)
Subject: Draft Lead CAP comment

Holly Davies - I am very opposed to the lead CAP as drafted primarily because the impact on humans and wildlife does not justify the onerous conditions of the plan. I have been a physician in Spokane for almost forty years and am as devoted to the general health and well being of the public as anyone but in my opinion this regulation is excessive and unnecessary. There is already a federal ban on lead shot for waterfowl hunting. To ban lead entirely would spell the death warrant for shotgun related shooting sports such as trap, skeet and sporting clays of which there are many participants in the state of Washington. There is no affordable or adequately performing substitute to replace lead. And in fact many of the gun clubs now retrieve and recycle fired lead shot. Another issue of unintended consequences is that most of the substitutes used for waterfowl hunting are less effective and result in more wounded animals. Respectfully, Thomas Ryan MD, 11017 E Sprague Ave, Spokane, WA 99206 - 509-891-6210 (H), 509-928-5124 (W)

From: Ivy Sacks
Sent: Thursday, October 02, 2008 1:47:43 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Ivy Sacks
112525 SW 212th PL
Vashon, WA 98070

(206) 463-9579

From: JACK SADLER

Sent: Tuesday, September 30, 2008 9:04:17 AM

To: Davies, Holly (ECY)

Subject: Lead shot ban

If you propose to totally ban lead shot from purchase, use, and ownership, effective at a specific date, you will effectively dissolve the shooting sports industry. This smacks of back door gun control. Is this what you intend?

Yes, lead shot for some uses is not good, its toxic and we all know that. It should come under control.

I recommend that you phase it out over a extended period of time. This will allow the industry and shooting sports time to take a new approach and maintain the sport that is part of our heritage.

Again, banning use and ownership of lead shot, in a non-specified environment, to me, is gun control, if that's your intent.

Jack Sadler
3316 Sunrise Cove
Lemma Island, Wa. 98262-8622

From: Andrew Salter
Sent: Thursday, October 02, 2008 7:18:14 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Andrew Salter
6051 78th Ave SE
Suite 540
Mercer island, WA 98040

From: Ron Sanders
Sent: Friday, September 19, 2008 1:08:12 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan comments

Holly, I am against any attempts to ban lead ammunition in Washington State. My reasons are simple:

- 1) This legislation appears to be a circuitous route to the banning of firearms in Washington State and given recent Supreme Court decisions it should be clear that doing so is unconstitutional.
- 2) The amount of lead expended in firearms pales in comparison to the amount of lead used to balance the tires on all of the cars you see clogging the highways along the I-5 corridor between Olympia and Everett on a daily basis. If your goal is to reduce the public exposure to lead, then banning wheel weights would be far and away the optimum solution.
- 3) My grandfather and my great grandfather were miners in Washington State. They were successful for many years. The elements they mined were Silver, Lead and Zinc. All three of those elements are naturally occurring elements in the environment throughout Washington State. As such, your proposed ban will do nothing to reduce the amount of lead in the environment. If anything the use of lead projectiles may help restore natural balance to the environment following all the mining that has occurred in the last 100 years. If your goal is to minimize wildlife exposure to lead, you will have failed in your proposal.
- 4) Lead is the only element that provides the properties required for ballistic accuracy and is affordable to the common man and/or has not already banned.
- 5) The vast majority of lead projectiles expelled from firearms is at legal shooting ranges. That lead is trapped and recycled periodically.
- 6) Given the lawsuits that will result in any attempts to ban lead projectiles used in firearms, you will be wasting an extraordinary amount of taxpayer money in your attempts to implement a policy that appears to be politically motivated and will minimal impact on the environment.
- 7) Your proposed legislation will do nothing but create a new class of criminals in Washington State.

If your goal is to improve the environment in Washington State then I suggest you drive out to the Olympic Peninsula and look back toward Seattle. What you will see is a smog layer that is beginning to look a lot like LA.

You can also drive up to Mount Rainer and look at the soot which collects on the glaciers over the summer months from all the pollution being generated throughout the greater Seattle metro area. If you want improve the environment you should be focusing on reducing the population of the Seattle Metro area and thereby reducing the number of cars on the roads and the volume of other pollution generated by the individuals who comprise the unbridled population growth which has occurred in the Seattle area over the last two decades.

Thank you for considering my views - Ron Sanders

From: Carl
Sent: Thursday, September 18, 2008 11:50:31 AM
To: Davies, Holly (ECY)
Subject: lead ammo

Hi Folks;

I am writing to oppose the lead ban in ammunition.

As a residual or inert element it does not harm wildlife.

As an active element it does not harm humans who ingest the game shot with it. Technology has give us 100% weight retention in many cases.

As a practical matter, lead bullets do not impact water supplies, development or outdoor activities.

As a private matter it is politically oppressive to make my ammunition illegal.

As a Military matter this is impractical. Of course there is not a Military exemption, *is there?*

It does not make sense to mandate the use of copper when this substance is in high demand as a recycled product - and a stolen one.

Oregon has imparted to us Initiative 1000 (the Washington Death with Dignity Act) and California has imparted to us Draconian gun laws and lead ammo foolery.

Washington needs to disassociate itself from its neighbors in these important issues and promote its image as a hunter/shooter friendly State. Wildlife revenues support such action.

The only places where lead may be an issue are public and Army shooting ranges. This is not sufficient cause for State wide action against the public at large.

The measure to ban lead ammunition must not be allowed succeed.

Carl Schiffeler
Snohomish, Washington

From: Rich Schlachtaer
Sent: Saturday, October 04, 2008 1:10:26 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Rich Schlachtaer
5035 NE 197th St
Suite 540
Lake Forest Park, WA 98155-3049

From: Linda Schmid
Sent: Saturday, October 04, 2008 7:19:02 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Linda Schmid
10677 Manitou Park Blvd.
Bainbridge Island, WA 98110

From: Ribs Schoderer
Sent: Wednesday, October 01, 2008 8:08:23 AM
To: Davies, Holly (ECY)
Subject:

To Whom It May Concern,

I am a citizen of our great state, and I am writing to tell you that your proposed ban on lead ammunition is absolutely wrong. We have been using lead ammunition for over 100 years, and there are no serious adverse affects. Law abiding citizens like me recognize that this is another attempt at gun control. The Supreme Court told us all that those who push for gun control have a twisted and inaccurate perception of the Constitution, so now they are trying to go after ammunition instead of guns.

There are no suitable substitutes for lead ammunition, and the affects on the environment are so minor that this proposed ban is ridiculous. We already have great conservation programs in this state that I support 100%. As lawmakers and representatives of the citizens of Washington, please recognize that this proposed ban is a ploy with ulterior motives. Do the right thing, and denounce this ban, and then defeat it. I expect you to represent me if you expect to continue to get my vote.

Very Respectfully,

MM1(SS) Andreas H. Schoderer, USN

"Evil Triumphs When Good Men Do Nothing." - Edmund Burke

From: Richard Schoening
Sent: Monday, September 22, 2008 1:57:34 PM
To: Davies, Holly (ECY)
Subject: Lead Plan

Holly,

I am a shooter in Oregon and am concerned about the recent laws passed in California and now Washington regarding the use of lead in all types of ammunition. As your report states, lead has been a known poison for a thousand years. In light of that, shooters, hunters, bullet casters and handloaders have acted accordingly. We use and handle lead safely. We mine the lead at our ranges and recycle it into new bullets. Bullets that are shot into a berm are held there until they are uncovered. They do nothing to the environment. They don't decay or rust like iron. Lead mini balls from the Civil War can still be found beneath battle grounds where they fell. They didn't decay or affect the surrounding ground. In fact rifling marks engraved in the lead can still be seen. These are bullets that were fired over 150 years ago by the hundreds of thousands.

Lead is a poison, but is far less dangerous than other every day substances. Lead won't burn or explode like gasoline. So long as we avoid lead based glazes on our dishes, and lead based paints, 90% of lead related problems are avoided. Workers who handle lead should wear a mask if it is in a dust form and wash with soap and water before eating. That should take care of the other 10%.

As to the thoughts of removing lead from ammunition, I can tell you it won't work. A lead cast pistol bullet costs 9¢ or so. A lead core rifle hunting bullet with a copper jacket costs 67¢ for the higher priced variety (Nosler .30 cal 180gr Partitions). All copper bullets with no lead cost 76¢ each (Barnes .30 cal 180gr Triple shock X-Bullet). Now watch this. An all copper handgun bullet to take the place of that 9¢ cast bullet will cost .90¢ (Barnes .41 cal XPB). So if lead were banned from ammunition, the price of bullets would go up in this case 10x. This would cause a black market in cheap lead bullets.

There is also second amendment issues related to this. If ammunition is banned, or too expensive for shooters to afford to practice, aren't our second amendment rights infringed?

I ask you to think long and hard before banning lead in rifle and pistol ammunition. Since the late 1960's shooters have faced one challenge after another to keep their right to own and use firearms.

We are still here despite the best efforts of legions of legislators, bureaucrats and special interest groups.

Lead is handled safely every day by shooters around this country. No one has been harmed by eating game taken with lead bullets. If there were cases I am sure you would have found them.

Leave hunters and shooters alone. We are not looking for another fight, but then we never do.

Rick Schoening

From: Tera Schreiber
Sent: Thursday, October 02, 2008 10:19:27 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Tera Schreiber
2015 E Lynn St.
Seattle, WA 98112

From: Ernst Schubert
Sent: Thursday, September 18, 2008 10:09:40 AM
To: Davies, Holly (ECY)
Subject: Against lead ammunition ban

Dear Holly,

I am against any further bans on lead ammunition. There is no equivalent substitute for centerfire rifle and handgun ammunition and also no substitute for use in muzzle loading firearms arms. Plastic sabots will not work in black powder rifles and handguns designed to use lead balls. Non lead projectiles are actually dangerous in cap and ball style revolvers. The physical properties (density and ductility) are unique to lead and are required to form a gastight seal and grip rifling properly. I also believe that these types of proposals are more pro-gun control then public safety based and should be dismissed on these grounds alone. Please consult with ammunition experts and not with anti-gun experts before making any decisions regarding ammunition. I urge you to reject any bans on lead use in ammunition.

Best Regards,

Ernst Schubert

From: Ray Schueler
Sent: Saturday, September 20, 2008 7:57:05 AM
To: Davies, Holly (ECY)
Subject: Comments on Lead Chemical Action Plan

Holly Davies
Department of Ecology
P O Box 47600
Olympia, WA 98504-7600
email: hdav461@ecy.wa.gov

COMMENTS ON LEAD CHEMICAL ACTION PLAN: LEAD AMMUNITION

I think it is a worthwhile endeavor to try and reduce or eliminate our usage and exposure to lead and it's alloys wherever it makes sense to do so.

I have over 45 years experience working with lead alloys as a home hobbyist who casts his own bullets and reloads his own rifle and handgun ammunition. I have taken the necessary precautions of working in a well ventilated area and used protective equipment such as shields and respirators. Every three years or so, I have my blood tested for lead levels and I am happy to report that they have always been in the very low "normal" range according to my medical doctor. In addition to my casting hobby, I shoot only lead alloy bullets from my rifles and handguns, and have averaged over 100 rounds a week for the past 9 years. I am fortunate to live in an area where I can shoot on my own property and reclaim my own lead. I have eaten venison, elk and moose that I have killed with lead alloy bullets during these past 45 years, and I have suffered no ill effects.

Any attempt to reduce my utilization of casting lead alloy bullets and using them for target or hunting does not make sense, because I've verified that it can be done safely over a long period of time.

Sincerely,
Raymond D. Schueler
5611 Swenson Road
Nine Mile Falls, WA 99026-9522
509-276-3739
shuz44@hotmail.com

Stay up to date on your PC, the Web, and your mobile phone with Windows Live. [See Now](#)

From: Mike Schutt
Sent: Thursday, October 02, 2008 9:41:04 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Mike Schutt
1911 Rucker Ave
Everett, WA 98201

From: Dorene Schutz
Sent: Thursday, October 02, 2008 12:07:47 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Dorene Schutz
218 Bowman st
Wilkes-Barre, PA 18702

570-825-5672

From: David Schuurman
Sent: Thursday, September 25, 2008 6:33:22 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Dept of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

RE: Lead Chemical Action Plan

I oppose the WA Dept of Ecology's proposed ban on lead ammunition. The handling of lead in using lead ammunitions is minimal at best.

The agency should not pursue any aspect of this proposal. Please use MY money chasing down REAL chemical problems, not targeting an outdoor user group that members of the agency may not personally approve of. We are the customers of the Dept of Ecology.

David Schuurman
20414 80th Street SE
Snohomish, WA 98290

From: DPScoby@NWLink.com
Sent: Friday, September 26, 2008 5:26:27 AM
To: Davies, Holly (ECY)
Subject: Lead Ammunition & WaState Ecology

Holly Davies / Department of Ecology:

(e-message to C.Gregoire)

I am aware of the Department of Ecology "Lead Chemical Action Plan" meeting 6Oct08 and wish to forward my thoughts. It is my understanding that lead ammunition is a target of a series of recommendations by the DOE in the LCAPlan. It is my understanding from the NRA that studies have shown that the lead that has been found as an issue is actually from pollutants and not spent ammunition. There is no adequate substitute for lead ammunition and any affects on humans or wildlife does not justify a ban as recommended by the WA DOE. This may well be a back-door ban on firearms as a ban on ammunition is a ban on firearms -- this scheme started in the 1930s, was resurrected in 1969 with LBJ, and is just as dishonorable today. Perhaps the WA DOE has lost focus on its primary purpose -- taking care of the ecology. I believe the WA DOE needs to work to clean lead pollutants, not attempt to clean the 2nd Amendment. Please keep in mind the voter response to I-676 -- what the DOE apparently wants is not what the people of WA want.

Respectfully Submitted,
Don Scoby

From: Chris Scott

Sent: Friday, September 19, 2008 4:14:40 AM

To: Davies, Holly (ECY)

Subject: Lead Chemical Action Plan

Hello,

I believe the attempt to ban the sale, use, and ownership of lead ammunition is a direct attack on my second ammendment rights.

Banning lead ammunition will render all but a very small amount of firearms possessed in Washington state completely useless, converting them, in essence, to very expensive clubs. I, along with most of my friends and family are marksmen/hunters, please stop the attempt to take away our pasttime.

Thank you,

Chris Scott

From: Jim Scott

Sent: Friday, September 19, 2008 1:47:36 AM

To: Davies, Holly (ECY)

Subject: Proposed ban on lead in hunting ammunition

It is my opinion that lead should NOT be banned in hunting ammo. There is no substitute that is practical to replace lead and furthermore there is little or no damage to humans or wildlife by using lead in hunting ammo .

I strongly urge that the ban should not be put in place.

Sincerely,

James A. Scott

P. O. Box 549

Pomeroy, WA 99347-0549

From: Justin Scott
Sent: Saturday, September 27, 2008 4:36:57 AM
To: Davies, Holly (ECY)
Subject: comments

It is not acceptable to use this LCAP to ban lead ammunition. Especially without a worthy substitute useable right away, you should not even be thinking about this bill. It should be and probably is illegal what LCAP is trying to do.

From: jane and eric Seibel
Sent: Friday, October 03, 2008 12:07:27 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

Please include actions to help diminish lead dust when houses are demoed ofr new buildings and have stiffer requiremnts for houses to be tested for lead and builders to protect neighbors from the lead dust of a demoed house.

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children?s brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state?s blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

jane and eric Seibel
6702 34th ave nw
seattle, WA 98117

From: Emilio Serrano
Sent: Friday, September 19, 2008 1:40:48 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

To Whom It May Concern:

In regards to the banning of lead ammunition, I oppose such actions. With no affordable alternative on the market for sportsman to be able to shoot, the banning of lead ammunition amounts to nothing but economic gun control. Add to this the fact that the environmental impact from lead ammunition is minimal at best and the justification of the ban is gone. If there was an affordable alternative that had the same performance of lead ammunition, I could understand banning lead, but at this time, there is no such alternative. If this ban were to go into effect, every sportsman and gun owner in Washington would be effected in a financially negative manner. Again, I oppose this proposed action and will be telling others of this plan.

Emilio Serrano
Walla Walla, WA

From: Lisa Sezate
Sent: Friday, October 03, 2008 6:22:47 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Lisa Sezate
2437 NW 196th St.
Shoreline, WA 98177

From: RShaf14819@aol.com
Sent: Thursday, September 18, 2008 11:17:45 AM
To: Davies, Holly (ECY)
Subject: Lead Ammunition in the CAP

Dear Ms. Davies,

As a hunter and shooter I find it very hard to believe that the hazard to the environment from the lead in ammunition is a major consideration. While considerable amounts might occur at shooting ranges or other high use areas, what sort of research supports theory that much of this finds its way into the environment in a manner that makes it a high hazard to people? In most hunting areas, the size of the area compared to the amount of ammunition expended in the area. For example, in big game hunting, I doubt if the average hunter even averages a single bullet fired per year. How can that impact the environment?

If something is to be done, make it based on real facts, not just someone's perception of a problem. Just because California jumped off the cliff doesn't mean that Washington has to follow!

Sincerely yours,

Richard G. Shaffer
4443 Blakley LP NE
Lacey, WA 98516

360-438-9216

Psssst...Have you heard the news? [There's a new fashion blog, plus the latest fall trends and hair styles at StyleList.com.](#)

From: Lisa Sharp
Sent: Thursday, October 02, 2008 9:28:01 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

We must protect our future generations! We need our children to grow up with strength and health as they will be making the decisions for us as we age. We also need to ensure that the state our children inherit will be one that is healthy. Please do not leave the task of cleaning up our state to our children. Show them the foresight that is so crucial to our existence!

Sincerely,

Lisa Sharp
1631 N 105th St
Suite 540
Seattle, WA 98133

3609292980

From: Rosemary Sharpe
Sent: Monday, October 06, 2008 11:48:00 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I feel really strongly about the lead issue. Please do your best to see that the following recommendations are implemented!

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Rosemary Sharpe
1603 S. Golf Course Rd.
Port Angeles, WA 98362

From: Shearer, Corey R

Sent: Wednesday, October 01, 2008 1:40:59 AM

To: Davies, Holly (ECY)

Subject: Lead

I wish to keep using lead ammo. Lead shot or lead bullets. DO NOT ban lead! Thanks, Corey, Washington voter.

From: Joan Shelby
Sent: Friday, October 03, 2008 3:05:57 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Joan Shelby
4720 52nd Ave S
Seattle, WA 98118

From: Patrick Sherritt
Sent: Friday, September 19, 2008 4:35:16 AM
To: Davies, Holly (ECY)
Subject: Lead ammunition

There should absolutely be no ban whatsoever on lead ammunition. The premise of it is silly enough, banning lead ammunition is essentially banning the use of a firearm, being as 99% of ammunition available on the market has lead in it. Your essentially violating people's 2nd amendment rights, and with the Supreme Court of the United States on the side of gun owners, your setting yourself up for a lawsuit. A Few points to consider:

Think of law enforcement. The ammunition in the firearms they entrust their lives too has lead in it. The simple reason being frangible ammunition has almost no penetration what-so-ever. Anyone with a piece of sheet metal strapped to their chest could easily defeat police bullets, which would end disastrously.

The people in this state have a right to self defense. Being as I have a concealed pistol permit in this state I can say matter of factly I use solid lead rounds for self defense ammunition. When lead gets heated, it gets soft, and in the case that I have to use a firearm in defense of my life, I want a bullet that will both penetrate and deform, thus stopping the attacker and not over penetrating and going through my attacker, and possibly hurting someone.

I have yet to hear of droves of animals being killed by ingesting lead ammunition, I do hunt, and have never heard of this. Where are the hard figures? I'm not interested in the fact that lead is dangerous, that it COULD happen. Everyone knows lead is dangerous, but I have yet to see a hard number of animals being killed by this, and I doubt there are any. Conjecture is not a good reason to violate the constitution.

See how Windows connects the people, information, and fun that are part of your life. [See Now](#)

From: Clark or Barbara Sherwood
Sent: Thursday, September 25, 2008 1:58:39 AM
To: Davies, Holly (ECY)
CC: Gary Sheets; Beth Sheets; Boyd D. Phillips
Subject: Draft Lead CAP

Holly Davies
Dept. of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Holly Davies; My name is Clark Sherwood, from Lopez Island. I have a BS degree in Fish & Wildlife Management, OSU. I believe your proposed ban on the use of lead by sportsmen is ill-advised for many reasons. The scientific evidence to support the environmental or public health danger from the insignificant use of lead by hunters, target shooters and fishermen is slight to non-existent. There is quite literally NO SUBSTITUTE for lead in the old (or new reproduction) firearms that fire a patched round ball. These are the only firearms used by the thousands of Washington residents who annually attend Historical Reinactments, Black Powder Rendesvous, etc. throughout the state. Your ban would immediately close down all these Rendesvous. Lead shot has been banned for years for use in waterfowl hunting, perhaps with good reason, but shot fired on most Trap, Skeet, and Sporting Clays ranges is mined and re-claimed periodically, lead shot fired at rabbits and upland game like grouse and quail is clearly of little or no significance. I've written to the Governor also about this matter, thankyou.

Clark Sherwood
913 Elliott Rd.
Lopez Island, Wa 98261

e-mail jasperbay@centurytel.net

From: DShier@aol.com
Sent: Sunday, September 28, 2008 5:44:14 AM
To: Davies, Holly (ECY)
Subject: Draft Lead Chemical Action Plan (CAP)

Hello Ms. Davies.

Thank you for taking a moment to read this note.

I won't bore you with a long dissertation of facts, figures, and opinions -- as I'm sure you are hearing them from many others.

I just want to add my voice to those opposing a ban on lead based firearms ammunition.

Thank you.

Best regards,
Daniel V. Shier
417 West Mansfield Avenue
Spokane, Washington 99205-4733

home * (509) 326-2329
work * (509) 534-1097 (M-F, 7:30 to 4:30)

email "Dshier@aol.com"

Looking for simple solutions to your real-life financial challenges? [Check out WalletPop for the latest news and information, tips and calculators.](#)

From: ShipleyDDS@aol.com
Sent: Wednesday, October 01, 2008 1:37:08 AM
To: Davies, Holly (ECY)
Subject: Draft lead CAP

I am writing to oppose any further reduction in the manufacture, sale, and use of lead ammunition. The use of non-toxic shot may be beneficial for the long term preservation of water fowl although I am certain many more birds are wounded instead of killed outright because of it. Let's keep using lead ammunition for hunting and shooting sports.
Respectfully,

Richard Shipley
2857 Lopps Rd
Deep Lake
Colville, WA 99114

Looking for simple solutions to your real-life financial challenges? [Check out WalletPop for the latest news and information, tips and calculators.](#)

From: Tom Shofner
Sent: Thursday, September 18, 2008 5:05:44 AM
To: Davies, Holly (ECY)
Subject: Lead Ammo Ban

Hi,

I recently moved to Kalama from Colorado. Part of the reason for the move is the outdoor opportunity. I am retired.

I like to shoot black powder guns. I find it a hoot! It is also a challenge, given my eyesight. I am careful when and where I shoot my rifles.

I also like to shoot pistols for target practice. I like to shoot shotguns too. I am careful.

On a fixed income, I have to be careful with my money, as well. There is no substitute for lead in my replica black powder guns. They are built using 200 year old technology. Other ammo for other guns is costly.

I am against any further ban on lead ammo. If the state wants to ban things, let's ban tobacco, alcohol, and casinos. All of these items do much more clearly documented harm than do lead bullets carefully used. There is no legitimate need for tobacco of any kind in this country, except greed. Get rid of that stuff before you attack my right to a little target shooting.

Tom Shofner
360-673-3268
166 Tara Ln.
Kalama, WA 98625

From: Forest Shomer
Sent: Thursday, October 02, 2008 8:12:20 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Forest Shomer
PO Box 639
Port Townsend , WA 98368

(360) 385-6114

From: Odis Sikes

Sent: Monday, September 29, 2008 3:57:45 AM

To: Davies, Holly (ECY)

Subject: Ammunition

I don't think that our ammunition has cause any great environmental hazards. So, I would appreciate if you guys would leave our lead bullets alone.

Thank you Odis

i am against the banning of lead ammunition.

wade silk

From: BYRON P SIMS
Sent: Friday, September 26, 2008 3:48:11 PM
To: Davies, Holly (ECY)
Subject: lead chemical action plan

I don't think we should ban the use of lead ammunition. It could lead to an infringement on personal self defense. A person who used a lead bullet in self defense could then be prosecuted or in some way have his/her "right to carry" or hunting privileges jeopardized.

From: Sims, Paul P CIV Shop 26, Shop 26
Sent: Saturday, September 27, 2008 4:28:07 AM
To: Davies, Holly (ECY)
Subject: RE: CAP comment

Attachments: SMIME.txt

The alternatives suggested are not viable. The cost of the bullet alone to reload conventional ammo exceeds the cost of the complete cartridge. From the average sportsman's view, this is an attempt to eliminate hunting through economic manipulation. Clearly, since the legislature found the evidence lacking last year, this appears to be the attempt of the few to enforce personal desires through regulation, rather than legislation.

Just to say "BATF says"

leaves too much unsaid. What was tracked ? How was it tracked ? What was the original question that generated that particular answer ? How does that relate to the data collected for FAWRA ? MOST of the shotgun ammunition sold in Washington for hunting is already non-toxic. Your data incorrectly makes no attempt to distinguish between taxes on non-toxic vs. lead and is therefore invalid for deposit calculations. The vast majority of lead shot use is on established ranges which ARE NOT feeding grounds for wildlife, so an arbitrary assumption that all wildlife feeds on lead contaminated areas is also invalid. If solid lead bullets are having an impact on wildlife I should see predator and scavenger die offs---Golden Eagles, Bear, Cougar, etc.etc. That is not being reported by any agency.

Using the Minnesota study was a death knell for credibility, as the fraudulent nature of that episode is well known in the hunting community. The data sources indicate using outdated material and cursory research. The alternative suggested is the use of copper bullets, currently having only one manufacturer and having its own problem associated with copper contamination of water sources, i.e. current efforts to reduce Puget Sound copper levels, although within a beneficial range , to Dabob Bay levels as the "standard".

Lots of reasons to do better things--but this evidence is weak. My Club has two biologists in the membership and they are currently reviewing the science of the data. The clubs position and presentation to the WWC will reflect their learned opinion.

Thanks for the dialog

-----Original Message-----

From: Davies, Holly (ECY) [mailto:hdav461@ECY.WA.GOV]
Sent: Thursday, September 25, 2008 14:14
To: Sims, Paul P CIV Shop 26, Shop 26
Subject: RE: CAP comment

Thank you for sending in your comments on the Draft Lead CAP. Ecology is not

proposing a ban on lead ammunition in the Draft Lead CAP. We would like to work with hunters and shooters to promote non-toxic alternatives to lead without negatively affecting hunting or shooting areas.

We are required to consider all the options and include all the options in the CAP (WAC Chapter 173-333). We have to include a no-action option, an option that results in the phase out of uses and releases, an option to manage the chemical to reduce exposures, and other options such as available substitutes. After considering all the options, we decided to recommend working with stakeholders on voluntary steps.

We were informed by the Alcohol and Tobacco Tax and Trade Bureau that 95% of the sales were for ammunition. If you have a better source for a different percentage, please send it to me.

Please take a look at the focus sheet we prepared about lead ammunition and the Draft Lead CAP. I've attached the fact sheet to this email or you can access it at:

<http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/>

Sincerely,

Holly Davies, PhD

Chemical Action Plan Developer

SWFAP/ Industrial

WA Department of Ecology

PO Box 47600

Olympia, WA 98504-7600

Phone: 360.407.7398

Fax: 360.407.6102

From: Sims, Paul P CIV Shop 26, Shop 26 [mailto:paul.p.sims@navy.mil]
Sent: Thursday, September 25, 2008 12:44 PM
To: Davies, Holly (ECY)
Subject: CAP comment

Read the draft, science is flawed

You quote the Minnesota report, which was proven to be fraud perpetrated by the action group. Subsequent testing on donated game that was selected by the Health Department was found to be uncontaminated. The only contamination was found in the spiked samples provided.

Too many generalized statements about "MASSIVE die offs" with no references or time frames noted

Flawed data on lead ammunitions sales based on sales tax collection. Lead ammo accounts for no more than 5 to 10 percent of all generated revenue--NOT 95 percent as stated in the CAP and used as the basis for calculation of deposit.

Bald eagle used as reference for waterfowl lead ban although DDT, habitat loss and salmon health was primary reason, Eastern Washington, where most of the lead shot is used for upland bird, has had no evidence of a golden eagle die-off even though they are the primary predator affected

Looks like an attempt to end run the legislative process that found no standing with this proposal in 2007

From: Wanda Sims
Sent: Friday, September 26, 2008 1:57:40 PM
To: Davies, Holly (ECY)
Subject: Lead ban

Opposed to the proposal for limitations on hunting lead. No adequate substitute available and no good science to show a substantial link between solid hunting bullets and damage. Also disappointed you choose to hold this meeting in the liberal I-5 area and did NOT post intent well to the rest of the state

From: Vanessa Simshauser
Sent: Saturday, October 04, 2008 5:41:57 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Vanessa Simshauser
1042 Cascade Ln
Camano Island, WA 98282

From: Sherelle Sinko
Sent: Thursday, October 02, 2008 9:11:51 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Sherelle Sinko
3770 sw grayson street
seattle, WA 98126

From: Rob Skeens
Sent: Friday, September 26, 2008 5:58:21 AM
To: Davies, Holly (ECY)
Subject: Re: Lead ban

Thanks for getting back to me but I have to tell you that I don't agree. I do understand lead abatement. I have shot firearms my entire life and like many other chemicals when handled properly they don't cause issues or health risks.

Risks associated with game shot with a lead projectile or health hazards associated with lead bullets in target practice are miniscule compared to the other poisons in our environment. This is a step in the direction of taking away the rights of gun owners. This is a hot button topic locally and nationally and I oppose limiting lead use in firearms 100%.

----- Original Message -----

From: Davies, Holly (ECY)
To: Rob Skeens
Sent: Thursday, September 25, 2008 11:31 AM
Subject: RE: Lead ban

Thank you for sending in your comments on the Draft Lead CAP. Ecology is not proposing a ban on lead ammunition in the Draft Lead CAP. We would like to work with hunters and shooters to promote non-toxic alternatives to lead without negatively affecting hunting or shooting areas.

We are required to consider all the options and include all the options in the CAP (WAC Chapter 173-333). We have to include a no-action option, an option that results in the phase out of uses and releases, an option to manage the chemical to reduce exposures, and other options such as available substitutes. After considering all the options, we decided to recommend working with stakeholders on voluntary steps.

Please take a look at the focus sheet we prepared about lead ammunition and the Draft Lead CAP. I've attached the fact sheet to this email or you can access it at:

<http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/>

Sincerely,

Holly Davies, PhD
Chemical Action Plan Developer
SWFAP/ Industrial
WA Department of Ecology
PO Box 47600
Olympia, WA 98504-7600
Phone: 360.407.7398
Fax: 360.407.6102

From: Rob Skeens [mailto:constableskeens@comcast.net]

Sent: Thursday, September 25, 2008 11:22 AM

To: Davies, Holly (ECY)

Subject: Lead ban

This lead ban is wrong. The facts in the study are not accurate and this is not something that you should pursue.

From: Gloria Skouge
Sent: Monday, October 06, 2008 11:04:04 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Gloria Skouge
326 NW 182nd Street
Shoreline, WA 98177

(206) 542-5138

From: BCWW

Sent: Sunday, September 28, 2008 8:42:20 PM

To: Davies, Holly (ECY)

Subject: your back door gun ban

MS Davis

You have not convinced me of the science behind your efforts to ban lead. No we should not sit around eating lead, but certainly one does not die as soon as you look at lead either. Rather than try to scare the public into an out-right ban on lead, why not educate the public. I am not counting on you or any other hired government to take care of me. I am a big boy and can decide for myself what is good for me. AND I will take responsibility for my actions.

Again where is the science, not pseudoscience, real science ? You have not convinced me yet that this is anything other than a back door grab for my guns. Before you go off on your "these are only suggestions" routine, please realize I am familiar with the technique of attrition. Get the public scared and take a little. Then take a little more when they get used to the first. And so on.

My fondest hope is that enough sensible citizens are made aware of what is trying to be done to them, and object strenuously to your actions. This is personal. You do NOT know what is good for me so stop trying to control me.

Although I do not live the fine state of Washington, I have visited often enough to care.

Sincerely,
Anthony W. Slatcoff
539 Cook Road
Fairhope, PA 15538
(814)267-5651

From: Aaron Smith
Sent: Tuesday, September 23, 2008 3:36:53 PM
To: Davies, Holly (ECY)
Subject: Lead CAP

Dear Ms. Davies,

I am writing to you to share my opinion as a Washington state resident, outdoor enthusiast, sportsman, and voter. I can appreciate the work that the DOE is doing to protect families and wildlife from dangerous chemicals. However, I do not want to see your work abused by those that are searching for a backdoor assault on our constitutional right to keep and bear arms. Today, lead free ammunition is not readily available to meet the needs of sportsman. It is important that you understand the difference between shot used in shotgun shells and bullets used in handgun and rifle cartridges. While steel shot has become more available for shotguns over the last several years, alternatives for handguns and rifles are not readily available. In fact, I have never seen or heard of an alternative to lead bullets. If they do exist, they are not available on a mass production scale and would likely be prohibitively expensive for the majority of citizens. Additionally, due to the differences in the way shotguns, handguns, and rifles operate, I think it could be dangerous and/or increase the wear on existing handguns and rifles to use bullets made from alternative materials. Using ammunition that does not behave identically to traditional ammunition, would void most firearms warranties and potentially put lives at risk since it would introduce a variable that the original firearms design had not been engineered to accommodate. Mandating the use of lead free ammunition at this point would be effectively the same thing as banning the guns themselves since no viable alternative ammunition exists. Outlawing the use and/or ownership of lead ammunition would also be unfair without compensation to those that have invested in ammunition. Ammunition has already escalated in price over the last few years and legislating individual citizens out of thousands of dollars of equipment without government compensation would be wrong. I appreciate your attention to this matter and I urge you to be very clear in your intentions and recommendations. Ambiguity in this area will likely meet fierce resistance from sportmen and gun owners and give a likely unintended and unnecessary opportunity for those that wish to undermine our constitutional rights.

Best Regards,

Aaron Smith
Woodinville, WA

From: David B. Smith
Sent: Tuesday, September 23, 2008 12:13:58 AM
To: Davies, Holly (ECY)
Subject: Lead Ban

I strongly urge you to reconsider your proposed ban on lead in the shooting sports.

Thank you for your time and consideration.

David B. Smith
614 E. 22nd Street
Vancouver, WA 98663

From: Diana Smith
Sent: Thursday, October 02, 2008 7:07:06 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Diana Smith
1521 NE 100th
Seattle, WA 98125

(206) 523-2618

From: Gary Smith
Sent: Saturday, October 04, 2008 1:25:36 AM
To: Davies, Holly (ECY)
Subject: Lead bullets

I am a hunter and shooter.

My experience tells me that lead bullets are a very minor, if any at all, harm to the environment.

Please don't waste valuable tax payer resources pursuing this minor issue.

Thank you

Gary M. Smith
4509 NE 54th St
Vancouver, WA 98661

From: MR J SMITH

Sent: Thursday, September 25, 2008 10:53:59 AM

To: Davies, Holly (ECY)

Subject: lead issue

there is no adequate substitute for lead ammunition
and that any affects on humans and wildlife do not
justify a ban.

lead has been used for a long list of things and there
has never been so much problems with it. Now all of a
sudden it is such a big problem.

It seems to me that new laws are being made and the
old ones are forgotten about.

thank you for your time

From: Tammi
Sent: Thursday, September 18, 2008 9:10:20 AM
To: Davies, Holly (ECY)
Subject: CAP Ecology Lead

After reading your CAP on lead ammunition and other products that can cause harm to the environment. I am a NRA member but I have to agree if a product that can be found as a alternative to lead in the lead shot or other products and can be done with a minimum impact to the gun owners. I have to say "go for it". I would be a more responsible gun owner if I also considered the impact on the environment. I would agree with this Ban.

Tammi Smith

From: Trevor & Reagan
Sent: Saturday, September 20, 2008 8:54:44 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Hello,

We are writing to give our opinion on the Lead Chemical Action Plan that is being commented on. We deeply believe that the LCAP is not needed. In our opinion, we believe that the lead ban on ammunition and fishing weights is not necessary.

The lead percentage rates found in humans/animals in our area (AT THIS TIME - not 10 years ago) (Washington) that are linked to fishing/hunting lead, are low. The waterfowl lead issue has already been tackled. Making bullets out of alternative metals is very insufficient and expensive. There are much more important issues to spend our time/money on. Washington State does not have a native carcass eating bird as California does with the California Condor eating dead carcasses near our shooting areas. Just because one State implements a law, doesn't mean all other States should follow suit.

It seems too many people these days have too much time and money on their hands.

Sincerely,

Trevor Smith
Reagan Smith
Paisley Smith
Charley Smith

From: Nancy Snow
Sent: Thursday, October 02, 2008 8:51:00 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, pregnant women and other sensitive populations to help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Nancy Snow
4350 Witter Road
Langley, WA 98260

(360) 221-8664

From: Nancy Snyder
Sent: Saturday, October 04, 2008 2:56:44 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Nancy Snyder
5220 Puget Rd NE
Olympia, WA 98516

360 456-5055

From: Phil Sohn (MSN)

Sent: Thursday, September 18, 2008 4:21:26 AM

To: Davies, Holly (ECY)

Subject: Comments on Lead Chemical Action Plan

I am against banning lead ammunition. I believe it will put hunting and shooting out of the budgets of many people. This morning I check on the Cabela's website to see what effect this would have on me. I looked at the cheapest lead and non lead alternatives. Here is what I found:

- Shotshells would go from \$6.49 a box to \$32.99. I shot an old gun that is not safe to use with steel, so I would have to use a lead alternative. This is a 5x price increase.
- Rifle cartridges would go from \$14.29 to \$47.99 a box. I could not even find rifle cartridges for the 223 or 22LR that are lead free. These are the most popular cartridges. This is a 3.3x price increase.
- In fact checking around, it doesn't look like anyone in the world make 22LR lead free ammo. This is by far the most popular ammunition.
- Competitive shooters frequently shoot 1,000s of rounds per month in order to remain competitive. The increased prices would severely limit participation.

I urge you not to ban the use of lead ammunition.

Phil Sohn
22909 NE 202nd St
Woodinville, WA 98077

From: Laurie Solomon
Sent: Thursday, October 02, 2008 10:41:50 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan. As we all know, lead is a potent neurotoxicant, which affects children's brains in the smallest doses.

We should all be able to expect that the government is doing its best to ensure that lead is not present in the air we breathe, food we eat, water we drink, or products we bring into our homes.

It is essential that the current draft plan be strengthened significantly.

I urge you to act on making the following inclusions to the draft plan:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals. Other states will surely follow suit.

Sincerely,

Laurie Solomon
POB 1342
Battle Ground, WA 98604

From: margaret sonnen
Sent: Thursday, October 02, 2008 12:00:41 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

margaret sonnen
15510 67th ave ct nw
gig harbor, WA 98332

From: Shirley Sonnichsen
Sent: Friday, October 03, 2008 3:00:55 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Shirley Sonnichsen
retired
1150 Englewood Drive
Richland, WA 99352-9484

(509) 627-1473

From: Don Spencer

Sent: Sunday, September 21, 2008 10:54:08 PM

To: Davies, Holly (ECY)

Subject: Reduction of the exposure of lead

To whom it may concern,

I am very concerned and alarmed with the all out and overboard prohibition with the use of lead ammunition for firearms in the State of Washington. Good citizens who hunt, target practice, and just appreciate and enjoy firearms will lose a valuable and needed tradition which we in America have seen slowly eroded away from the core public rights.

As an amateur American historian, A muzzle loading gun builder and shooter at times, and one who is very much appreciative of our country's beginnings, I urge this over blown attack on lead ammunition to be reconsidered.

We will all lose out if real people aren't involved in the environmental regulation policies of this State or the Nation.

Sincerely,
Don Spencer

From: Douglas Spencer
Sent: Sunday, September 28, 2008 6:06:50 AM
To: Davies, Holly (ECY)
Subject: Reduction of Lead in the environment

Holly Davies,

I support the concept of reducing lead in our environment. I believe that as a responsible hunter and citizen, we must do everything we can to protect the environment, wildlife, and humans.

In short, I support the draft CAP.

Regards,

Douglas A. Spencer

4503 NE 128th Ave.

Vancouver, WA. 98682

(H) 360-254-2059

(C) 253-335-3690

From: Sporcich, William R
Sent: Friday, October 03, 2008 6:40:51 AM
To: Davies, Holly (ECY)
Subject: Lead Ban Comment

Hi. I just wanted to say that I am against the opposed ban on Lead ammunition state wide. I think the benefits are small, while the cost and inconvenience are large.

I am an upland hunter and I use old side by side shotguns. I seldom see other hunters, and in a usual year I shot 2 to 3 boxes of shells while hunting. Gong to non-toxic shot will drive up the cost of hunting, not save a single species of animal, and make me wish I lived elsewhere.

Bill Sporcich

Lockheed Martin Information Services
509-372-3941 Desk
509-438-0718 Cell

From: Chris Stay
Sent: Thursday, October 02, 2008 7:15:43 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Chris Stay
540 Seamount Lane
Edmonds, WA 98020

(425) 776-3501

RECEIVED

OCT 01 2008

Ecology - SWFA - Ind

September 28, 2008

Dear Ms. Davies,

I am writing in regards to the lead ban proposed by your Department.

I have read this 355 page proposal, and I am dismayed by the irrelevant research it contained. For one, we are in Washington state – not California, not Montana, and certainly not British Columbia, Canada. Shouldn't your team of researchers be looking at the effects of lead in our own state?

Also, how can the Department begin to draw on the incident of the California Condor deaths, when it cannot even be proven that they died from lead exposure? Isn't the first rule of the scientific method "do not make any claims in your research you cannot prove and verify"?

Furthermore, I harbor extreme concerns with this proposal because it is specifically "focusing on lead wheel weights, lead fishing tackle, and lead shot." I am ashamed to call myself a citizen of a state that would stoop to such back-door tactics. It is blatantly obvious that your proposal is a direct attack on our Second Amendment rights. Rights, I may add, that made this great country a country – and not a colony of Great Britain.

Many sports from hunting to competitive shooting are a vital part of our culture and economy in this state. Instigating this ban will be a severe detriment to everything from wildlife conservation to tourism – the things that set our state apart from the rest.

Please do look at the larger picture.

Respectfully yours,

Heather Stearns
702 N Touchet Rd.
Dayton, WA 99328

From: George Steed
Sent: Saturday, September 20, 2008 1:58:42 PM
To: Davies, Holly (ECY)
Subject: Draft Lead CAP

Dave: This proposal is totally “off the wall” and has obviously not been well researched. There is currently no available substitute for lead bullets, as is the case with shotgun ammunition, so the ban will render obsolete the current ammunition, worth tens of thousands of dollars, now in the hands of hunters and target shooters in Washington.

How will target shooters practice when there is no substitute available? Even if a substitute becomes available target practice will not be feasible because of the ballistic differences with ammunition being used by competitors. And how will visiting shooters be able to compete when they cannot use the ammunition with which they have practiced?

How will Fish and Game be able to issue licenses to hunt (game management) when hunting becomes impossible due to the lack of a substitute?

The loss of revenue to the State and the thousands of dollars worth of ammunition rendered useless renders this proposal quite ridiculous.

Sincerely,
George Steed
285 Neil Bay Dr.
Friday Harbor, WA 98250

From: Linda Stein
Sent: Thursday, October 02, 2008 8:18:36 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I have had cancer, lost many friends to chronic illness and have seen many children on chemo lines. I am writing to express my support for a strong Lead Chemical Action Plan.

Our greatest wealth is access to our basic needs - void of contamination by lead or other toxins: the air we breathe, food we eat, water we drink, or products we bring into our homes. Nothing else can compare to the value of this because not only does it affect our health, but that of every living thing.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Linda Stein
844 N 161st Place
Shoreline, WA 98133

(206) 542-1581

From: Harald Stenger
Sent: Thursday, September 25, 2008 12:44:29 AM
To: Davies, Holly (ECY)
Subject: Lead CAP

Dear Mrs. Davies,

I'm writing in reference to the proposed Lead Chemical Action Plan (CAP). Although I think it's a good idea to reduce general lead in our environment, I'm completely opposed to any further restrictions on lead ammunition use. From other reading I've done, it doesn't appear that all studies are consistent in showing excessive harm to wildlife from lead ammunition. A guaranteed result is that banning lead ammunition will cause huge cost increases to hunters and contrary to the study quoted in the CAP, steel shot is less effective than lead and leads to more wounded birds (I speak from personal experience).

So please record me as one hunter that's opposed to any new lead ammunition restrictions here in Washington state.

Sincerely,

Harald Stenger
16518 113th Street Ct E
Bonney Lake, WA 98391

From: Mike Stennett
Sent: Tuesday, September 23, 2008 1:27:04 PM
To: Davies, Holly (ECY)
Subject: Lead Ban

To Whom it may concern,
Please don't ban lead from use in firearms. I am a historical re-enactor and participate in Civil War, Cowboy Action Shooting and fur era re-enactments. There is no safe substitute for lead. The safety is both to the shooter and the firearms. In Cowboy action shooting we shoot at targets with soft lead bullets that offer almost no ricochet of the lead bullets back at the shooters. This would not be so if other metals were used. Also many participants use period firearms that would be damaged and be unsafe to use if other than lead were used in them.

There is no safe alternative to the use of lead in muzzle loading shotguns, rifles, or pistols. Banning the use of lead would should not be permitted.

**James M. Stennett
30506 S. 855 P.R.S.E.
Kennewick, WA 99338
509-627-3746**

From: James Stennett
Sent: Wednesday, September 24, 2008 1:49:04 PM
To: Davies, Holly (ECY)
Subject: RE: Lead Ban

Thank you for your timely reply. I really appreciate your including the pdf file. I found it helpful and informative.

From: Davies, Holly (ECY) [mailto:hdav461@ECY.WA.GOV]
Sent: Tuesday, September 23, 2008 8:55 AM
To: Mike Stennett
Subject: RE: Lead Ban

Thank you for sending in your comments on the Draft Lead CAP. There is no proposed ban on lead ammunition in the Draft Lead CAP. We would like to work with hunters and shooters to promote non-toxic alternatives to lead without negatively affecting hunting or shooting areas.

Please take a look at the focus sheet we prepared about lead ammunition and the Draft Lead CAP. I've attached the fact sheet to this email or you can access it at:
<http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/>

Sincerely,

Holly Davies, PhD
Chemical Action Plan Developer
SWFAP/ Industrial
WA Department of Ecology
PO Box 47600
Olympia, WA 98504-7600
Phone: 360.407.7398
Fax: 360.407.6102

From: Mike Stennett [mailto:bentouit@clearwire.net]
Sent: Monday, September 22, 2008 9:27 PM
To: Davies, Holly (ECY)
Subject: Lead Ban

**To Whom it may concern,
Please don't ban lead from use in firearms. I am a historical re-enactor and participate in Civil War, Cowboy Action Shooting and fur era re-enactments. There is no safe substitute for lead. The safety is both to the shooter and the firearms. In Cowboy action shooting we shoot at targets**

with soft lead bullets that offer almost no ricochet of the lead bullets back at the shooters. This would not be so if other metals were used. Also many participants use period firearms that would be damaged and be unsafe to use if other than lead were used in them.

There is no safe alternative to the use of lead in muzzle loading shotguns, rifles, or pistols. Banning the use of lead would should not be permitted.

**James M. Stennett
30506 S. 855 P.R.S.E.
Kennewick, WA 99338
509-627-3746**

From: Tom Stephens
Sent: Thursday, September 11, 2008 11:32:37 PM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Hi,

I am writing this email note to disagree with the proposal to eliminate lead from products currently in use by sportsmen. Those products, of themselves, contribute very little (if anything) to what Ecology has to say about the biological hazard of lead. Banning the use of lead in such things as lead sinkers, lead shot, wheel weights, etc would cause a far greater economic impact on the State than any benefit that might be gained by such a ban.

Sincerely,
Thomas L Stephens
(425) 743-3546

From: sharon stevens
Sent: Friday, October 03, 2008 6:49:47 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

sharon stevens
2113 221st place ne
Sammamish, WA 98074

From: Douglas Stevenson
Sent: Thursday, October 02, 2008 7:47:23 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Douglas Stevenson
2808 Welk Common
Fremont, CA 94555

From: Jacqueline Stevenson
Sent: Friday, October 03, 2008 9:58:45 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Jacqueline Stevenson
2 Chestnut St
Boston, MA 02108

From: Jan Stewart
Sent: Thursday, October 02, 2008 7:17:24 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my urgent support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

The plan is long overdue, which makes the above improvements to it all the more important. We have known about the toxic effects of lead for over 30 years. It's about time for us to get serious about protection.

Washington State should be in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Jan Stewart
14613 9th Place NE
Shoreline, WA 98155

2063655527

From: Scott Stickney
Sent: Friday, September 19, 2008 1:27:45 AM
To: Davies, Holly (ECY)
Subject: Lead CAP

There is no adequate substitute for lead ammunition and any and all affects on humans and wildlife do not justify a ban as recommended by the Department of Ecology.

Netscape. Just the Net You Need.

From: Terri Stilson
Sent: Monday, October 06, 2008 2:48:21 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

Most of this letter has been written by the WA Toxics Coalition. Please note that I would also like to see movement toward educating contractors and other workers in the home- for example, painters-; in addition to homeowners, about how to conduct safe demolition for both remodeling and re-building. This is one of the leading sources of lead and asbestos exposure for children and adults.

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Terri Stilson

2826 32nd Ave W
Seattle, WA 98199

From: David Stitzhal
Sent: Thursday, October 02, 2008 7:27:17 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

As a parent, small business owner and proud Washingtonian, I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

David Stitzhal
3111 37th Place South
seattle, WA 98144

206 7230528

From: Adrian Stogin
Sent: Monday, October 06, 2008 7:39:54 AM
To: Davies, Holly (ECY)
Subject: LEAD

I disagree with your findings as you said lead is a natural element produced by mother earth. The fact that industry did mine lead to use in products, which is limited by current regulation, has reduced the amount of lead interfused in paint, piping, and other produces. The use of lead in electronics and other produces such as ammunition is a necessity to ensure the bullet stops after impact in the target or game. If this issue is a means to restrict the use of firearms it is stepping on a slippery slope, and a more danger element used to produce ammunition. The amount of lead used in hunting and target shooting is minimal in regards to other lead products and what is mined from the ground. Also lead production cannot be greater then what is mined. Your pie chart is in error of the facts and mother earth production has to be a 50-50 % and not as you show 1%.

Adrian Stogin

MRC Secretary

From: Julie Strandquist
Sent: Saturday, October 04, 2008 5:24:10 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

I find it idiotic and pathetic that I have to write you a letter asking for you to make sure that lead stays out of the environment, products, and production. It is time to realize that human health and well being is more important the all mighty dollar. Are bodies are being assaulted everyday and it is time that someone listen to the people and stand up for what is right. Is there anyone that cares anymore?

Sincerely, Julie Strandquist, RN

Julie Strandquist
2910 E. 57th Ste 5, #150
Spokane , WA 99223

(509) 448-4515

From: HomerK9

Sent: Thursday, September 25, 2008 10:25:12 PM

To: Davies, Holly (ECY)

CC: Rolfes, Christine; Appleton.Sherry@leg.wa.gov; Rockefeller, Sen. Phil

Subject: Lead Chemical Action Plan

Dear Department of Ecology,

This appears to be just another attempt to infringe on gun owners and individuals that enjoy shooting sports and target shooter. Non-lead alternatives for some of the most popular ammunition just don't exist such as 22 caliber. Oh I'm sure the market place would be able to come up with something, but at what expense. This is more about controlling guns and shooter by pricing out of the guns and giving them few if no place to shoot.

This is just a larger version of what happened in Bremerton, Washington. The Sheridan Park Community Center had an indoor shooting range in the basement for over 35 year. Over the years thousand of individuals had enjoyed target shooting there. But when an anti-gunner Bremerton mayor was in office the range was closed the reason, lead exposure.

Nothing was ever discussed regarding increasing ventilation or if anyone in all those years had ever experienced any problems from lead exposure. No, it was just too easy of a way to screw with individuals that enjoy shooting. I now drive approximately an hour and a half, one way to be able to shoot.

This is just another approach to screw with the 2nd Amendment and individuals that like to shoot guns.

There is way too much of my tax dollars being spent so individuals can infringe on our rights.

When our elected officials take an "Oath of Office" the oath contains a phrase that they will "uphold the Constitution". To me that means protect my freedoms and rights with respect to the Constitution, NOT to try and find ways around these freedoms and rights.

Sincerely,

David Straub

From: [Atsuko Patzwald](#)
To: [Davies, Holly \(ECY\):](#)
Subject: Strengthen Lead Action Plan
Date: Monday, October 06, 2008 2:37:09 PM

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Atsuko Patzwald
12604 104th. Ave. NE
Kirkland, WA 98034

From: [Jim Overton](#)
To: [Davies, Holly \(ECY\):](#)
Subject: Strengthen Lead Action Plan
Date: Monday, October 06, 2008 11:35:08 AM

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Jim Overton
8903 NE 144th Place
Suite 540
Bothell, WA 98011

(425) 814-0995

From: [G Donahue](#)
To: [Davies, Holly \(ECY\):](#)
Subject: Strengthen Lead Action Plan
Date: Monday, October 06, 2008 1:43:38 PM

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

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Sincerely,

G J. Donahue
18012 14th Pl W
Lynnwood, WA 98037

(425) 729-5549

From: [Amy Beliveau](#)
To: [Davies, Holly \(ECY\):](#)
Subject: Strengthen Lead Action Plan
Date: Monday, October 06, 2008 9:18:29 AM

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

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Sincerely,

Amy Beliveau
8132 34th Ave SW
Seattle , WA 98126

(206) 861-7514

From: [Jennifer Halos](#)
To: [Davies, Holly \(ECY\):](#)
Subject: Strengthen Lead Action Plan
Date: Monday, October 06, 2008 1:12:24 PM

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Jennifer Halos
2301 NE Blakeley St. #202
Seattle, WA 98105

From: [Lou and Joan Truskoff](#)
To: [Davies, Holly \(ECY\):](#)
Subject: Strengthen Lead Action Plan
Date: Monday, October 06, 2008 12:27:56 PM

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Lou and Joan Truskoff
118 N. 58th St.s
Suite 540
Seattle, WA 98103

From: Eycke Strickland
Sent: Thursday, October 02, 2008 9:35:38 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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Sincerely,

Eycke Strickland
613 Cedar Park Drive
Port Angeles, WA 98362

(360) 417-2984

From: Fred Struck
Sent: Saturday, October 04, 2008 1:07:50 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

Find ways to keep lead out of the environment and implement them. Don't let lead get dumped.

Sincerely,

Fred Struck
11307 SE 217th St
Kent, WA 98031

(206) 271-3334

Hello,

I'd like to comment on the proposed ban on lead ammunition.

I cant imagine that there are not more serious concerns to deal with.

With the possible exception of a waterfowl blind where hunters dump round after round, year after year in to the same area I doubt that anyone would ever see a benefit

.

I would estimate that lead pencils in classrooms are a larger danger.

Thanks

Mike Stuhr

From: Greg Swank
Sent: Wednesday, September 24, 2008 11:10:11 AM
To: Davies, Holly (ECY)
Subject: Lead shot and target shooting.

I would like to both support and condemn the proposed lead ban on “bird shot” and other ammunition.

I believe the effort to mitigate or eliminate lead from the environment is a good thing, however, there needs to be some rationality and vision applied to this issue. Typically, bird hunters shoot only a few hundred round of ammo a year, except maybe dove hunters, and the cost to bird hunters of changing to non-toxic shot is unlikely to result in many of them giving up hunting...but some will. However, please realize that the cost of non-toxic shot is a major issue for most of us working class hunters, particularly in these increasingly strained economic times. Your proposal seems to imply that we can bear this burden and it will not impact any other part of our economic life and that of the community. Believe me, if I end up paying \$25 to \$45 for a box of shotgun shell, it will definitely impact my financial situation and somewhere somebody is not going to get the extra money I had to spend on non-toxic shells.

As for big game hunters, they usually practice with a .22 caliber rim fire rifle and this is the firearm of choice for training kids in gun handling and shooting. It is also the most purchased ammunition in the world. The .22 rim fire gun shoots lead bullets and only lead bullets. A total ban on lead .22 bullets will have a tremendous impact on hunters, hunter training, target shooting and the future of hunting.

Trap, skeet and sporting clays shooting – the banning of lead for these sports will have a huge economic impact! I am a typical trap and skeet shooter and I shoot on average 12,000 rounds a year at the cost of about \$5 a box, which is about \$2500 a year. Going to non-toxic shot will increase the cost to at least \$12 a box, which is \$6000 a year. I am retired on a fixed income and shooting is my main hobby. I will have to quit shooting which is my only real enjoyment due to some physical problems that keep me from more active sports. Also, my trap guns cannot shoot steel shot or it will damage them and the other non-toxic shot shell are on the order of \$30 to \$40 a box, which makes shooting only a rich man’s sport.

Another shooting area impacted by a lead ban will be cowboy action shooting. This sport uses very low velocity pure lead bullets. They cannot use alternative materials

because the velocities must be higher and this will lead to dangerous ricochets and target damage.

Also to be considered is the use of lead bullets in muzzle loading rifles and handguns (currently required by law), as well as shotgun slugs and buck shot for hunting big game.

As you can see, the elimination of lead from shooting is not a minor matter. If you, through this irresponsible, short-sighted and irrational proposal are successful in banning all lead from shooting you will destroy shooting as a sport and, eventually, hunting. You may consider this a victory but you will have killed the machine that drives conservation and in all probability you will end up harming more animals than you save by eliminating lead from shooting. A lack of vision is often found in the exuberant campaigns of well meaning individuals...hopefully that is what you are...but the lack of vision and a full understanding of the impacts of such exuberance usually leads to unintended and unfavorable consequences.

I propose as a rational solution that the use of lead shot be banned from all bird hunting activities (the dentists will love this) but that it is allowed on established shooting ranges. This way the lead shot is confined to specific and defined areas, which will eliminate the random and uncontrolled spread of small lead particles into the environment and allow for “mining” to reclaim the shot (yes, shot at most ranges is reclaimed for reuse).

The lead ban should not be applied to other forms of shooting at this time as there is no scientific evidence that trace lead in game shot by lead bullets actually presents a health hazard to man or beast and the contention that it does casts serious doubt on the credibility of anything presented as background or evidence in the proposal.

Thank you for your time,

R Gregory Swank (retired)

36903 N. Teresa Lane

Benton City, WA 99320

From: WILLIAM LITA SWANSON
Sent: Saturday, September 20, 2008 6:43:06 AM
To: Davies, Holly (ECY)
Subject: Lead Ammo Ban

It just keeps on amazing me on new ways the anti-gun crowd will find to eliminate guns from the United States and the world. They couldn't win in the Supreme Court, so now they are trying to do it with what they call "Ecology". You know, I can understand banning lead shot in the area where Condors thrive because they can pick it up. I've seen some places try to ban it in areas where water fowl inhabit because the fowl may pick it up from feeding off items they feed off in the lakes and waterways. I've even seen someplace that they were trying to ban it to keep humans from ingesting the lead in the meat they eat from the waterfowl. All people I know are smart enough to just spit it out.

You know, I've never seen anything an article that says waterfowl have died from eating a bullet from a handgun or rifle. I've not seen anything that says a deer has died from eating a bullet from the grass they eat. I've hunted for many years and have never had a problem while consuming duck, deer or anything else. I just spit out what I shouldn't eat. The fact is the ban on sale and use of lead bullets only aims at one thing, getting rid of firearms.

There are a lot of other ways the anti-gun crowd will attempt to try to get around the Second Amendment now that they can't change the wording, and this is one of them. I'm hoping the state of Washington will side with common sense this time and not allow what the Department of Ecology is trying to do with the banning lead ammunition.

William Swanson
w.h.swanson@msn.com

From: Joe Swenson
Sent: Monday, September 22, 2008 10:45:22 AM
To: Davies, Holly (ECY)
Subject: lead ammo ban

Ms. Davies,

I strongly encourage you to reevaluate the planned ban on lead ammunition. Lead ammunition does not lead to the massive destruction to our environment as is generally thought. Lead from ammunition is a very minute amount compared to the amount in the lead car batteries that are improperly disposed of every day. The first place one should be looking to make a reduction on the impact on our environment are the many vehicles on the road which have obtained waivers for failed emissions readings and the many gasoline and diesel engines which leak profuse amounts of oil. Give auto repair technicians the ability to condemn vehicles which are hazardous to our environment. Thank you for your consideration.

Joe Swenson
Vancouver, Wa

Want to do more with Windows Live? Learn "10 hidden secrets" from Jamie. [Learn Now](#)

From: Mary Swirsky
Sent: Saturday, October 04, 2008 3:01:38 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Mary L Swirsky
6626 NE 182
#102
Kenmore, WA 98028

(425) 482-4438

From: Jim Sykes
Sent: Saturday, September 20, 2008 11:39:49 PM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan Comments

Thank you for the opportunity to comment on the Lead CAP.

I am a hunter and shotgun sports shooter, so any plan to ban (or phase out) lead shot would be of great concern to me.

There are basically three main types of shotgun sports: Trap, Skeet, and Sporting Clays. All involve the use of shotguns and lead shot and there is no suitable substitute for lead shot in any of the sports. All three sports are conducted on shooting ranges specifically designed for the sport. A "game" of trap or skeet will usually require 25 shotgun shells, though some trap events require up to 50 shells. On a given day, a trap or skeet shooter may easily shoot 100-300 rounds of shotgun shells. A Sporting Clays event requires at least 100 shotgun shells. Personally, I primarily do trapshooting, and will shoot about 100 shells twice per week. Additionally, competitive events are held on a regular basis, and at those events most people will shoot 100 to 300 rounds in a day. These sports are not confined to Washington, and many people travel to other states to compete in events.

For shotgun sports shooters, the "pattern" of the shot produced by gun and shell are of great concern. Unfortunately, there is no reasonable substitute for lead to produce the uniform repeatable pattern that the shooters depend on. Additionally, the substitutes for lead are very expensive and a requirement to substitute them for lead would be beyond the financial means of most shooters. Since the shooting ranges depend on a reasonable number of shooters participating, a ban on lead shot would probably force their closure, eliminating a sport which provides pleasure for a great number of shooters.

The shot which falls on these ranges poses no threat to the health of wildlife or personnel. It is contained within very limited areas, and indeed many ranges permit companies to come in at appropriate times and "mine" the areas for recycling of the shot.

As a hunter, I have no problem using the lead shot substitutes when hunting waterfowl. I also use them for upland game bird hunting where required by the State, though I doubt that the requirement is necessary. I personally use Bismuth shot, which is quite expensive, but it is affordable given the small number of rounds actually fired during a hunting season.

As a shotgun sports shooter, I still need to be able to use lead shot. I, and many other shotgun sports shooters, will go through several thousand rounds per year, and we simply cannot afford to switch to a lead substitute. It has been my experience that a lead substitute shell costs 4 to 5 times that of a lead shell, rather than the 2 to 2 ½ times indicated in the CAP. Additionally, the lead substitutes do not pattern as well, and are certainly harder on the shotguns, especially given the large number of rounds a shotgun sports shooter goes through.

It makes sense to ban lead in areas frequented by waterfowl, but expanding beyond those areas would be devastating to the community of shotgun sports shooters.

Respectfully,

James Sykes

From: Craig Talbot
Sent: Tuesday, September 16, 2008 1:45:08 PM
To: Davies, Holly (ECY)
Subject: Lead Ban Proposal #08-07-09

Dear Ms. Davies,

Could you direct me to this publication? I've searched on the Ecology website, and cannot find it.

Craig Talbot, M.D., Ph.D.

From: Tony Tamaccio
Sent: Thursday, September 18, 2008 9:36:45 AM
To: Davies, Holly (ECY)
Subject: Lead Ban

September 17, 2008

Know this upfront--I will NEVER obey ANY lead ban in ANY jurisdiction. Such a ban is without any scientific justification whatsoever, and can safely be viewed as the beginning of backdoor gun control. This proposal is based strictly on green-weenie hand wringing hysteria, and its benefits have yet to be proven anywhere. Even the Bell studies of the past have repeatedly been called into question as to method and subsequent "findings". This retarded idea is tailor made for the extremists in the green/gun grabbing crowd of hoplophobes. Just who do you people think you are to propose outlawing the use of legitimate, safe and Constitutionally protected PRIVATE PROPERTY! Lead bullets "skin over" with an oxide that prevents "leaching" into the soil, and there are no LEGITIMATE studies to lend any power to the argument that wildlife is even remotely impacted by either lead on the ground, or lead in carcasses. I suggest you move on to something of value to the tax payers of this state, and stop pandering to the whack jobs that run California.

Tony Tamaccio

From: G Tannheimer
Sent: Friday, September 19, 2008 8:06:57 AM
To: Davies, Holly (ECY)
Subject: CAP Lead Ammunition

The Gov. Document as posted on the internet is very misleading and I think lacks information that could be helpful to you and your efforts to try and ban lead in Washington.

Are you aware that lead is removed and recycled from just about every shooting range in Washington State? Lead has become extremely expensive and is a major cost of shooting: it is recovered, recycled and reused. Do your estimates and projections reflect this? Have you ever been to a shooting range?

Are you aware that there is no substitute for lead that can be used for competitive shooting, police practice shooting, military exercises, and most non bird game hunting? Are you aware that the guns used today cannot be modified to shoot materials such as steel?

Are you aware and have estimated what the cost would be to the State of Washington if lead were banned for hunting and shooting? The proposal to ban the use of lead would effectively end the majority of hunting and all competitive shooting in Washington as it exists today. This would have noticeable effect on Washington State's economy. Have you estimated the economic impact? Have you estimated the impact on the Washington state DNR's budget and revenue because of hunting curtailment?

A meeting is going to be scheduled with Governor Gregoire in the next couple of weeks when her calendar permits. We want to make sure that she understands the economic impact this will have on Washington and to try and understand why California Condor preservation needs to be addressed by banning lead in Washington.

I look forward to hearing from you!

Gregory L. Tannheimer

From: Bruce Taylor
Sent: Friday, October 03, 2008 7:44:21 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Bruce Taylor
2001 East Yesler Way
#23
Seattle, WA 98122

From: Bruce Taylor
Sent: Friday, October 03, 2008 7:45:11 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

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Sincerely,

Bruce Taylor
2001 East Yesler Way
#23
Seattle, WA 98122

From: Ricky Taylor
Sent: Thursday, October 02, 2008 11:20:59 AM
To: Davies, Holly (ECY)
Subject: Get the Lead Out

To: Holly Davies, PhD

Dear Ms. Davies

The European Union recognized the danger posed by lead products years ago and has been progressively restricting the use of lead in products. In response to the EU Directive on the Restriction of Certain Hazardous Substances (RoHS), I managed a project to remove lead from the electronic products produced by the company that I work for. From that first hand experience, I know that lead can be removed almost entirely from all but a handful of product categories.

It is time for Washington to take a leadership position in the US on lead.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Ricky Taylor
4221 114th ST SE
Everett, WA 98208

(425) 337-7593

From: Stan Taylor
Sent: Friday, September 19, 2008 2:57:27 AM
To: Davies, Holly (ECY)
Subject: Lead shot

Dear Ms. Davis,

In a recent message it was noted that there is an issue concerning lead shot and it's potential of terminating this from our Ecological environment in Washington State.

As a member of one of this states shotgun sports club, all of these clubs rely on lead shot to practice and enter shotgun tournament around this great state. Unfortunately no other type shot is economically available for all of these shooters. Even though the price of lead shot has risen these past few years, the general populace most generally rely on reloading their own shells for economic reasons.

Please reconsider the impact on all of the Sports Clubs around the State, every state tournaments, and the national tournaments we are involved with.

The standard use of the World Olympics also uses lead shot during their Skeet/Trap shooting events.

Steel shot is what we recommend for all of our hunting needs, and is the state standard. However the cost per box is overtaxing as most of the sports shooters generally shoot 4-5 boxes during one practice session

If time permits, you are welcome to visit our new club (Seattle Skeet Trap/Boeing Employees Shotgun Sports club) and King County Sports Park any weekend (11:00a - 4:00p) in Ravensdale, WA, or call us at (425-413-1421)

Respectfully,
S. F. Taylor

Stan T

From: Tim Tennessen
Sent: Sunday, October 05, 2008 6:25:01 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical action plan

Dear Ms. Davies:

Please be advised that I oppose the Lead Chemical Action Plan. The proposed Lead Chemical Action Plan will violate my Second Amendment rights by prohibiting almost all ammunition.

In addition the Lead Chemical Action Plan is a danger to the public safety, as it will stop individuals from being able to practice firing their weapons and stopping them from becoming proficient or from maintaining their proficiency, resulting in a real and present danger to the public safety.

Respectfully,

Tim Tennessen

6606 72nd Dr. NE

Marysville, WA. 98270

360-651-2654 home 425-356-9381 cell tim.tennessen@comcast.net

From: Thomas, Zach --- Reg. Safety And Training Mgr ---POR
Sent: Tuesday, September 30, 2008 8:58:19 AM
To: Davies, Holly (ECY)
Subject: Lead Ammunition plan

Holly,

I would like to go on record as strongly opposing the proposed regulations on use of lead ammunition in Washington state. I do not see this as a danger to anyone given the negligible amount of lead this might release into the environment.

Thanks,
Zach Thomas

From: Ben Thompson
Sent: Thursday, September 18, 2008 1:41:06 PM
To: Davies, Holly (ECY)
Subject: Lead CAP and lead bullets

I don't understand why the use of lead bullets should be targeted when plain lead is the oldest form of bullets, yet condors have still survived after all these years. Take the .22 long rifle for example: http://en.wikipedia.org/wiki/.22_long_rifle it is one of the oldest and still most popular cartridges for training, pest control and small game hunting. It is also the least expensive. The .22 long rifle cartridge is only available in lead and copper plated bullets, so this is ecological measure would effectively kill this old tool of gun owners and hunters. Also condors mainly feed on large carcasses like deer and cattle which are not hunted using .22 ammunition.

This lead cap also opens to door to more infringement on gun owners rights. This would be a grave disservice to the citizens of you state.

From: John Thompson
Sent: Thursday, October 02, 2008 7:14:33 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

John Thompson
250 Kineth Point Place
Coupeville, WA 98239

(360) 682-5818

From: Info@Code4LEsales.com
Sent: Tuesday, September 30, 2008 11:10:00 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Ms. Davies,

As an avid participant in shooting sports, hunter, and as a business owner that serves local and national law enforcement I want to voice my concern with this proposal.

This proposed ban is not based on any sound science. There is absolutely no evidence of a human health risk to hunters who consume game harvested with traditional ammunition. Likewise, scientific evidence of population-level impact to wildlife caused by the use of traditional ammunition is also lacking. This proposed ban of traditional ammunition will have a devastating impact on hunting and overall wildlife conservation.

Best regards,

Mike Thompson

CODE 4, LLC

Your Law Enforcement Specialists

P.O. Box 1905
Bothell, WA 98041

Ph: 206.310.0343
Fax: 425.398.1497
info@Code4LEsales.com

<http://www.code4lesales.com>

From: Shelly Thorn
Sent: Sunday, October 05, 2008 2:09:40 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Shelly Thorn
1606 N 54th St
Seattle, WA 98103

From: George Tippner
Sent: Friday, September 19, 2008 10:35:44 PM
To: Davies, Holly (ECY)
Subject: No to lead ban

There is no adequate substitute for lead ammunition and that any affects on humans and wildlife do not justify a ban as recommended by the Department of Ecology.
Leave well enough alone.

George Tippner
12012 N Landt Farms Ln
Nine Mile Falls, WA 99026

From: Sharona Tocco
Sent: Thursday, October 02, 2008 9:19:23 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Sharona Tocco
District Administrator
8123 236th ST SW #216
Edmonds, WA 98026

206-854-6977

From: Barbara Tombleson
Sent: Friday, October 03, 2008 5:07:08 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Barbara Tombleson
7526 SW Capitol Hill Rd.
Suite 540
Portland, OR 97219

From: Patricia Tomlin
Sent: Thursday, October 02, 2008 7:28:32 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Patricia Tomlin
353 Ridge View Drive
Sequim, WA 98382

(360) 683-0886

From: John Tompkins Sr.

Sent: Sunday, October 05, 2008 9:26:12 AM

To: Davies, Holly (ECY)

Subject: Circular about potential restrict/ban of lead bullets and fishing gear

Holly - This is going way too far!!! The ramifications of this must be a blind spot. John Tompkins

From: Allison Torgesen
Sent: Thursday, October 02, 2008 12:26:33 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Allison Torgesen
20252 NE 163rd St
Woodinville, WA 98077

From: Steve At RainShadow
Sent: Saturday, September 20, 2008 6:07:40 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

I'm commenting on the ammunition topic,

While there has been a lot of research and development on lead substitutes for shotgun loads, your statements concerning rifle projectiles on page 98 are very misleading.

The Barnes copper bullets have for a long time been considered a "specialty" and "quirky" projectile. Most shooters who use them don't like them. There are many hunting applications where bullet fragmentation is desirable, sometimes necessary. There's one non-lead bullet (the Barnes) that has been commercially manufactured. There thousands of other brands and styles of projectile incorporating lead. The fact that ONE exists out of THOUSANDS, doesn't make it a viable substitute.

I agree that non-toxic shotshell loads are a good idea. The sheer volume of projectile mass when comparing shotguns to rifles is laughable. The shotguns send out literally tons more projectile into the environment than do rifles. (Both by the weight of the payload, and by the number of rounds fired in a hunting or sporting scenario.) We're talking multiple pounds per ounces, and then some.

I'd support non-toxic shotshell requirements in ALL shotshell applications, including skeet/trap recreational shooting rounds. (I can only imagine the TONS of lead leaching into the ground around sporting clays sites. Think of one ounce of lead per "boom." Single projectile "boom's" don't even come CLOSE.)

I'd be all in favor of leaning on the industry to start developing adequate substitutes, but thus far, the substitutes fall far short of adequate.

I don't think lead substitutes in rifle/pistol projectiles are necessary, nor are they worth the headache and uproar implementing such requirements would bring. Rifle shooters would be left hanging for who knows how long until better substitutes were developed. There would be lots of grumpy people.

Steve Tormala
Sequim, WA

From: saltramjr

Sent: Thursday, September 18, 2008 8:08:51 AM

To: Davies, Holly (ECY)

Subject: Washington State Lead Chemical Action Plan (CAP)

Governor Chris Gregoire:

The proposed Chemical Action Plan (CAP) would immediately ban the purchase of lead ammunition used for hunting as well as target and competitive shooting. Further, and with punitive ramifications, it would also ban ownership of lead ammunition in the state of Washington. I implore you to consider the effects of such a ban at this time;

1. Law abiding citizens who enjoy shooting sports (target shooting, clay shooting, bench-rest shooting, etc.) would immediately be cut off from these recreational activities.
2. Hunting away from water such as up-land birds, deer, etc. where lead fallout is so minute, affects on humans and wildlife is not quantifiable, would be eliminated or severely curtailed.
3. Citizens such as myself, who own lead ammunition used for legal purposes, would have to bear the financial loss of disposing of their ammunition. For many of us on a fixed income, this is truly a burden.
4. At this point in time, there is no adequate substitute for lead ammunition in many applications. Additionally, the risk to humans and wildlife in the activities mentioned does not justify a ban as recommended by her Department of Ecology.

I urge you to be reasonable and to separate yourself from the negativism some people force on the legal and long-time tradition of shooting sports. Forcing an immediate ban on the use and ownership of lead ammunition is unnecessary and punitive.

Thank you.

Sal Tramaglini Jr
4420 N.E. 122nd Street
Vancouver, WA 98686-3393
Tel: 360-885-2206
Cell: 503-307-4502
saltramjr@yahoo.com

From: Matthew Trent
Sent: Tuesday, September 23, 2008 5:35:24 AM
To: Davies, Holly (ECY)
Subject: Re: Lead ammunition ban

Ammunition is at all-time high prices. For quality ammunition, hunters are paying over \$1/round these days. Target and practice shooters are paying \$0.20/round for the cheapest 9mm or rifle ammo. Considering a typical practice session is about 100 rounds, that's serious money. Even .22lr, the traditional cheap, "plinking" ammo is alarmingly expensive now.

As commodities go up and the dollar goes down, and regulation like the proposed are imposed, the cost continues to skyrocket.

When the cost of exercising a civil right has been driven out of the range of the common man, the civil right has been de-facto discontinued. At that point, everything else is irrelevant.

--

Matthew Trent

On Mon, Sep 22, 2008 at 12:00 PM, Davies, Holly (ECY) <hdav461@ecy.wa.gov> wrote:

I'm sorry you think this is vacuous political doublespeak. Some hunters and shooters use non-lead ammunition. We would like to work with people who use ammunition on alternatives and other ways to reduce exposures, such as more recycling.

From: Matthew Trent [<mailto:matt@thetrents.org>]
Sent: Monday, September 22, 2008 11:15 AM
To: Davies, Holly (ECY)
Subject: Re: Lead ammunition ban

That sounds contradictory.

There is no alternative to lead that will not take prices to a level which excludes the common man from exercising his rights. These expensive lead substitutes are also generally of dubious performance/effectiveness. No ammunition means the same thing as no guns. Less ammunition means less practice and proficiency and less safety.

The new trend in gun control is to restrict ammunition, by banning lead or requiring barcodes or the like. Gun owners are keenly aware of these slippery slopes.

Vacuous political doublespeak assurances are of no value here.

--

Matthew Trent

On Mon, Sep 22, 2008 at 11:00 AM, Davies, Holly (ECY) <hdav461@ecy.wa.gov> wrote:

Thank you for sending in your comments on the Draft Lead CAP. There is no proposed ban on lead ammunition in the Draft Lead CAP. We would like to work with hunters and shooters to promote non-toxic alternatives to lead without negatively affecting hunting or shooting areas.

Please take a look at the focus sheet we prepared about lead ammunition and the Draft Lead CAP. I've attached the fact sheet to this email or you can access it at:

<http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/>

Sincerely,

Holly Davies, PhD

Chemical Action Plan Developer

SWFAP/ Industrial

WA Department of Ecology

PO Box 47600

Olympia, WA 98504-7600

Phone: 360.407.7398

Fax: 360.407.6102

From: Matthew Trent [mailto:matt@thetrents.org]

Sent: Thursday, September 18, 2008 12:33 PM

To: Davies, Holly (ECY)

Subject: Lead ammunition ban

I am writing to voice my most strenuous opposition to this proposed ban on what basically amounts to all commonly-available ammunition.

Lead ammunition is the only effective option for hunting and self-defense. It is also the only affordable option for target practice and competition.

Ammunition bans amount to a de-facto attack on firearms and self-defense rights protected by the United States and Washington State constitutions. It moves sporting and self-defense out of reach for the average person, since already-high ammunition prices would positively SKYROCKET.

Protecting the liberties of its citizens is a primary function of government. No ideal could be higher. This ban is absolutely incompatible with our rights and Washington State and US citizens, and flies in the face of the principles of our free society.

Thank you for your time.

--

Matthew Trent

Centralia, WA

360-736-0991

From: Olaf Trytten
Sent: Friday, September 26, 2008 2:11:19 PM
To: Davies, Holly (ECY)
Subject: Draft Lead Chemical Action Plan (CAP)

Dear, Holly Davies:

The Washington Department of Ecology has opened the Draft Lead Chemical Action Plan (CAP) for discussion. A provision of this plan is a threat to our constitutional rights.

Page 208 of the CAP states, "Products that do not need lead and directly expose wildlife include wheel weights, small fishing weights, and some ammunition." Firearms ammunition is clearly not the competence of the Dept. of Ecology and they have no business recommending alternatives to lead ammunition.

Recommendation 9 on Page 235 of the CAP calls for a phase out of lead shot. But there is no substitute for lead shot.

You are responsible for the Dept. of Ecology. Do not allow your department to recommend such infringements of our rights.

Sincerely,

Olaf Trytten
16009 NE 99th Street
Redmond, WA 98052
otrytten@verizon.net

From: dan tucker
Sent: Thursday, September 18, 2008 10:18:52 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

I see this not as an attempt to help our environment, but as a way for the liberal eco-marxists to indirectly affect our second amendment rights.

From: Kathi Turner
Sent: Thursday, October 02, 2008 8:34:05 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Kathi Turner
14203 74th st n.
Loxahatchee, FL 33470

From: SCOTT TURNER
Sent: Saturday, September 13, 2008 7:57:58 AM
To: Davies, Holly (ECY)
Subject: Opinion on lead ban

To whom it may concern-

My wife and I are both strongly against this ban. It is nothing more than another means of circumventing the Second Amendment by the liberal left who is destroying this country and what our Forefather's intent was and still is. Lead exists naturally, and it certainly has been proven to, once oxidized, not pollute or leach into water systems. I want this ban stopped at any and all costs!! Legislation like this is nothing more than Communistic in my opinion and I will not tolerate it! Enough!

Scott and Michelle Turner
Richland, Washington

Stay up to date on your PC, the Web, and your mobile phone with Windows Live. [See Now](#)

From: Evette Twyford
Sent: Friday, October 03, 2008 11:36:57 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Evette Twyford
7114 west 86th street
Overland Park, KS 66212

HOUSE INTERNET E-MAIL DELIVERY SERVICE
SENATE INTERNET E-MAIL DELIVERY SERVICE

TO: Senator Craig Pridemore

CC: Representative Bill Fromhold
Representative Jim Moeller

FROM: Mr. Keith Tyler

STREET ADDRESS:
8904 ne 28th pl
vancouver, WA 98665

E-MAIL: clantyl@comcast.net

PHONE: (360) 909 - 6233

SUBJECT: Dept of Ecology lead chemical action plan

MESSAGE:

Dear Senator, and Representatives,

It was just brought to my attention that the Dept Of Ecology is trying to pass a Lead Chemical Action Plan which would effectively ban firearm ammunition and there for the use of firearms. Many have tried to produce accurate and effective ammunition without lead but all have failed.

As hunters and competition shooters my family uses lead core ammo for most of our past times. As a law enforcement officer I need to use lead based ammo for practice and duty.

The restrictions on gun ranges concerning lead are already strick. We do not need any more government regulations concerning this issue. It appears it has more to do with gun control than ecology.

Please look into this legislation and stop this from becoming law.

Keith Tyler

NOTE: We are 99% sure that this constituent is in your district

RESPONSE REQUESTED: Mr. tyler has requested a response to this message.

From: Selim Uzuner
Sent: Friday, October 03, 2008 12:01:11 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Selim Uzuner
PO Box 750
Carnation, WA 98014

(425) 333-4316

From: Jody Vajko
Sent: Friday, October 03, 2008 2:50:13 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

I am a consultant for a green business that allows parents to clean with micro-fibers and cold water. I am also studying to become a childbirth educator. Eliminating toxins from the environments of children and expectant moms is of special interest to me! Please act to keep our little ones safe and healthy.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Jody Vajko
31 S. 333rd Lane, Apt. D
Suite 540
Federal Way, WA 98003

253.874.4678

From: james van wingerden
Sent: Wednesday, October 01, 2008 2:14:23 PM
To: Davies, Holly (ECY)
Subject: Draft Lead Chemical Action Plan

I am contacting you as a result of the Department of Ecology's proposed Lead Chemical Action Plan. its plan is another way for the liberals to put a band on guns. this is a violation of our second amendment which would be against the spirit of the nation and bill of rights. i'm asking you to take in consideration our freedoms before you make a hasty decision. DONT TAKE OUR RIGHTS AWAY FROM THE PEOPLE!!!!

From: Pete VanderWegen

Sent: Friday, September 26, 2008 8:40:16 AM

To: Davies, Holly (ECY)

Subject: Ban on lead bullets

There intent of this e-mail is to comment on the Department of Ecology's request to ban lead bullets for hunting. The fact that there is no truly adequate substitute bullet places hunted animals at greater jeopardy. There certainly isn't enough lead left in the ground from big game hunting to cause concern to humans or other wildlife. This is a poorly crafted plan that serves little, if any, benefit.

I would urge the plan to be dropped.

Pete VanderWegen

From: Kyle Vanek
Sent: Tuesday, September 30, 2008 1:03:09 AM
To: Davies, Holly (ECY)
Subject: Lead ammunition

Banning the sale, use, and ownership of lead based ammunition is the last thing we need to be dealing with during times like this. Not only will this raise our ammo price by three times or more but it will affectively ban the use of multiple firearms. I don't hunt but I am an avid target shooter. The cost of this hobby is already extremely high. I have a decent collection of World War II guns that I like shooting on occasion. The ammo for these rifles are no longer manufactured, so the only ammo in existence for these guns are older production runs from 1940s to the late 1960s. All of this ammo is lead based.

I understand the need to protect the environment but there are much worse things going on in this state/country to be worried about than lead. This includes the ever expanding cities and roads that are destroying land, streams, and bays in our beautiful state. There are several counties in this state that do not require their cars to be smogged. Transportation is a disaster (not near as bad as California but we are getting there)

The cost on ammunition in the past two years has already on average doubled in price do to the fighting going on in the middle east. Ammo supplies have been shorten to supply the militaries requests. This has brought the average single round of pistol ammo to 35 cents and the rifle ammo to 50 to 70 cents or more. A commonly used rifle round by hunters and target shooters alike (30-06) averages 65 to 80 cents. Lead free 30-06 rounds cost around \$1.90 per shot! That makes 20 shots out of my rifle \$38. Now, add that to the 20 to 50 shots each out of my other guns and my once a month fun day at the range cost me well over \$150, not including the charge to use the range and cost of gas to get there. I don't know about you but I work very hard to support my wife and I, and at prices like this it really restricts my rights to enjoy the one sport that I have been doing since I was 7 years old.

So, please, think very carefully how this will affect a very large group of people in this state. Don't make another sport accessible only by the rich.

Kyle Vanek

From: shari vanenkevort
Sent: Friday, October 03, 2008 12:09:28 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

We have two grandchildren who are being exposed to many toxins in their environment in Tacoma. To reduce the lead burden would be a wonderful thing. Please go above and beyond to protect the children of Washington State. Thank you so much.

Sincerely,

shari vanenkevort
322 olympic straits drive
sequim, WA 98382

(360) 683-5727

From: eugene vanover
Sent: Friday, October 03, 2008 11:09:29 AM
To: Davies, Holly (ECY)
Subject: lead ban

while it is true that the gravel pit shows high level of lead it is the only place were shooting is allowed it is like closing all the swimming places except one then griping that all the people are swimming in one place. The statement non page 98 of your study states that non lead ammunition is available for all calibers is false in fact there is no lead free bullets for any rimfire caliber except 22 magnum. There is lead free shot for all shotguns and this is were they are baseing this statement. The lead free shot is a great idea, shotgun pellets do not travel far and the shooting is fairly concentrated in areas were ducks and geese congregate. The people who raised this question and tested the venison in minnesota and caused the waste of tons of meat were guilty of planting lead in the samples they had tested.(check with the government of minn. and wisc.) There is no proven effect from human consumption of game taken with conventional bullets the california lead ban is a back door approach to make the shooting sport unaffordable for the common man why else would they ban the use of lead bullets in areas that the condor hasn't been in 40 years. Bullets do not usually remain in game they pass through leaving exit holes they may remain on the ground in the area in hunting areas they should not poise a problem due to them being widely scattered, they are only concentrated in areas were target shooting is done. If you do not participate in the shooting sport you need advisors that do so you can gain a basis understanding of how it works and the problems it may cause. Gun control groups like the brady bunch and others use very deceptive tactics to achieve and gain on discouraging gun use of any kind. The lead ammo ban is only one of their indirect tactics.

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From: Genevieve Vayda
Sent: Friday, October 03, 2008 1:01:27 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Genevieve Vayda
3801 Woodlawn Avenue North
Seattle, WA 98103

From: conrad verpoorten

Sent: Saturday, September 27, 2008 8:15:41 AM

To: Davies, Holly (ECY)

Subject:

To: Dept. of Ecology, Myself and family have lived and recreated in this stste since the 1860s . I have three grown sons also and we have just heard about this proposed ban. This is totally wrong and we are very much against it. I am 64 years old and have hunted and studied wildlife in this state for most of my life.We feel this is mainly political and would hope it is stopped.

Conrad J. Verpoorten

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From: vesper/comcast
Sent: Monday, October 06, 2008 5:01:35 AM
To: Davies, Holly (ECY)
Subject: Draft Lead CAP

Dear Holly:

As a competitive rifle shooter who uses ammo with lead bullets, I am against your plan to ban lead bullets used in firearm ammunition. There is not a suitable alternative. Also, I don't understand the concern. The bullets aren't new lead. The bullets are made of lead that already exists in the environment so how can making bullets out of already existing lead cause the effects of the lead to be worse? In any event I don't like it and am totally against it! If bullets are banned, my hobby of competing in rifle shooting competitions would be gone and this is something that I have done for 45 years and is very important to me.

Merrill K. Vesper
18619 SE 346th Street
Auburn, WA 98092
budsman52@msn.com

From: Rob & Carrie Viens
Sent: Thursday, October 02, 2008 3:47:26 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Rob & Carrie Viens
3870 Robby Ct
Bellingham, WA 98226

From: davevigen

Sent: Thursday, September 18, 2008 3:45:45 AM

To: Davies, Holly (ECY)

Subject: Lead Ammunition

There is no adequate substitute for lead ammunition and any effects on humans and wildlife do not justify a ban. Thank You.

David L. Vigen
811 30th st 1
Anacortes, WA 98221

From: Marci Villanueva
Sent: Thursday, October 02, 2008 7:17:24 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Marci Villanueva
23507 99th PL W
Edmonds, WA 98020

From: Kristopher Vogel
Sent: Thursday, October 02, 2008 10:38:37 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

There is no adequate substitute for lead ammunition, and the minor effects of lead on humans and wildlife does not justify the ban on lead ammunition. I also feel that this ban is a horrible attack on my second amendment rights, and is completely unconstitutional because of the restrictions on ammunition that this lead ban will cause.

From: Mark Vucelick

Sent: Tuesday, September 23, 2008 12:45:03 PM

To: Davies, Holly (ECY)

Subject: lead chemical action plan

Holly, please accept this comment on the current lead chemical action plan out for public comment, specifically the sections dealing with lead ammunition. Please note: I currently am a hazardous waste subject matter expert working on the Hanford site in Eastern Washington.

I am opposed to any further restriction on lead ammunition in any form. I find the risks of exposure to humans and the environment grossly overstated and incorrectly defined in the lead chemical action plan. The risk of exposure to lead from ammunition is suitably minute to effectively be non-existent for the general population.

From: Joyce Ward
Sent: Thursday, October 02, 2008 4:00:18 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Joyce Ward
15220-273rd Drive NE
Duvall, WA 98019

From: Stuart Ward
Sent: Thursday, September 25, 2008 10:16:18 PM
To: Davies, Holly (ECY)
Subject: Lead Ban

Holly,

I wish to express my dismay the dept would consider a ban on lead when there is no science or proof to back up such a measure. No game animal or bird in the state of Washington , no migratory bird, no non-game bird or animal has been shown to need "lead relief" from lead contributed by sportsmen.

This political and NOT legitimate management. Our tax dollars should be spent on the many more pressing issues.

Sincerely,

Stuart Ward
Washington Hunter
Oregon Master Hunter
Washington Waterfowl Association
National Rifle Association

From: Gail Waser

Sent: Monday, September 22, 2008 2:19:41 AM

To: Davies, Holly (ECY)

Subject: Lead Chemical Action Plan

There is no adequate substitute for lead ammunition and that any affects on humans and wildlife do not justify a ban as recommended by her Department of Ecology.

Gail Waser
PO Box 1519
Ocean Park, WA 98640

From: Alysha Waters
Sent: Saturday, October 04, 2008 3:50:09 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Alysha Waters
1310 10th St. C505
Bellingham, WA 98225

360-671-5373

From: Patricia Waterston
Sent: Friday, October 03, 2008 8:07:45 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Patricia Waterston
5815 Princeton Ave NE
Seattle, WA 98105

From: Val Watson

Sent: Monday, September 22, 2008 5:56:54 AM

To: Davies, Holly (ECY)

Subject: Lead Chemical Action Plan

Gentlemen:

I'm opposed to the inclusion of lead shot and bullets in the Lead Chemical Action Plan. I'm an active shooter and sportsman who would be unjustly penalized if approved. I'm a licensed FFL dealer, both as dealer and manufacturer of ammunition, and this would severely impact my business.

LeRoy A. Watson, Jr.

From: Ron J. Webb
Sent: Saturday, October 04, 2008 11:55:27 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Holly Davies
Dept of Ecology
P.O. Box 47600
Olympia, WA 98504-7600
hdav461@ecy.wa.gov

Dear MS Davies:
Please be advised that I oppose the Lead Chemical Action Plan. The proposed Lead Chemical Action Plan will violate my Second Amendment rights by prohibiting almost all ammunition.

In addition the Lead Chemical Action Plan is a danger to the public safety, as it will stop individuals from being able to practice firing their weapons and stopping them from becoming proficient or from maintaining their proficiency, resulting in a real and present danger to the public safety

Respectfully,
Ron J. Webb
Attorney at law.

From: Gutturspike@aol.com
Sent: Sunday, September 21, 2008 12:00:42 PM
To: Davies, Holly (ECY)
Subject: (no subject)

please leave our right to buy and use lead ammunition alone thanks D.E. weber

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From: scott webster
Sent: Saturday, September 20, 2008 6:54:50 AM
To: Davies, Holly (ECY)
Subject: Lead ammunition

Dear Holly,

I have been using steel shot for waterfowl hunting for over 20 years with good success. Currently there is no substitute for lead when using modern rifle or pistol shooting. Please allow the industry to engineer a proper lead free substitute for modern rifle and pistol sports, prior to banning.

Kindest regards,

Scott Webster

From: Miranda Wecker

Sent: Tuesday, September 23, 2008 6:28:45 AM

To: Davies, Holly (ECY)

Subject: support for the Lead Chemical Action Plan from DOE

I am a currently member of the Washington Fish and Wildlife Commission. The subject of the impacts of lead on birds in Washington, has been brought to the attention of the Commission on a number of occasions.

I am writing to express my personal support for the Lead Chemical Action Plan issued by DOE . Particularly important is Recommendation #9 discussing the options for reducing wildlife's exposure to lead in the environment. The Plan endorses outreach and education to promote voluntary transition to non-lead products, as well as a regulatory approach where harm to wildlife is well documented. There are alternatives to the use of lead in most cases. The risks are well understood and identified in this plan.

Thank you for your thorough and well balanced approach.

Miranda Wecker

PO Box 160

Naselle, WA 98638

360-484-7128

From: Bruce Week
Sent: Saturday, September 27, 2008 11:02:59 PM
To: Davies, Holly (ECY)
Subject: lead bullets

Do not allow this new law to ban lead bullets to pass.
Bruce Week
Wenatchee, Wa

Paul Weir
3405 172nd ST NE #5 PMB 169
Marysville WA 98223

Email: paulweir111@yahoo.com

September 23, 2008

Holly Davies
Dept of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Dear Holly,

I am a Washington resident, voter, and NRA member.

Regarding the Washington State lead ammo ban that is currently being proposed:

Many people are losing a lot of sleep (I know I am) over this proposed lead ammo ban, which appears to be an attempt at a sneaky back-door attack on the Second Amendment by the State of Washington. In checking the Advisory Committee Membership list, it is clear that there is nobody whatsoever from the firearms industry on the Advisory Group or present at the Seattle meeting on September 16th. Maybe they were hoping that the NRA would not notice. Well, we did notice.

I found out about the September 16th public meeting, the day after the meeting from an NRA e-mail. The initial time frame and the numbers of meetings for the approximately one million Washington state gun owners to respond are completely unacceptable for something this important.

I have been looking at your web pages and notice the dates of these public meetings. The Washington state firearm dealers, owners and shooters need at least 60 more days to gather together and to attend two or possibly more of your public meetings -- which need to be rescheduled a couple of months from now. We have somehow been completely left out of these discussions. We need to be represented at these meetings, as we would be drastically negatively affected by any lead ammo ban.

The issue is not only about the environment; it is also about the Second Amendment -- the right to keep and bear arms. We all view this proposed lead ammo ban as a direct attack on the right to keep and bear arms. We happen to use lead bullets and shot, and making our ammo illegal is completely unacceptable and is also unconstitutional as it directly infringes on the right to bear arms, which was recently upheld by the U. S. Supreme Court in District of Columbia v. Heller.

Lead ammo is essential for proper functioning of many of our guns because these guns are designed to use lead ammunition and would be damaged if some other material were to be used for the ammunition, in addition to being far less cost effective than lead. You cannot have functioning guns without the appropriate affordable ammunition. There are many parts to most firearms but the most important part of every firearm is the ammunition without which it is useless.

What about people who own old antique, surplus guns or guns with oddball calibers (hundreds of different calibers out there) where no new style ammo is available? This lead ammo ban will turn them into criminals every time they fire their gun. Many people have very old shotguns that would be seriously damaged by anything other than lead shot.

Research has always shown that lead is by far the only practical and best material for pistol and rifle target ammunition, birdshot, and trap shooting. That is why it has been used for centuries. The people who decided on lead for these uses back then were a lot smarter than our present government. Lead ammunition is used for home defense weapons, on which about a million people in Washington rely for their families' and especially their children's safety in the event of a home robbery or other type of break-ins while waiting for the police to arrive. People on limited incomes may not be able to afford much more expensive bismuth or tungsten ammo to protect their families.

I checked on the alternatives that are mentioned in the Advisory Committee's study. Since I, too, am a trapshooter like my grandfather, I checked the price of lead shot, which is currently \$39.95 for a 25-lb bag. That is already doubled in price in the last few years at an already very, very expensive \$1.60 per pound. Then I priced bismuth shot and it is six times as much at \$9.50 per pound. Ecotungsten shot is \$60 per kilo (\$24 per pound or 15 times as much as lead.

With this lead ammo ban, you will put an end to the long enjoyed sport of trapshooting in Washington State as even the rich could not afford these prices, and I sure cannot. The trapshooting sport has been going on since about 1880 (organizing with rules in about 1889) and has many very dedicated participants, many of whom have been trapshooting for decades, it being their main hobby. Like my grandfather: his whole life was spent as a Boeing machinist, improving his shotguns and trapshooting. He was an excellent shot as well, hitting 100 out of 100 regularly which is the whole goal of the team of five shooters, this being a greatly enjoyed social activity for these people. This is a unique culture that a ban on lead would be destroying.

Lead is the most cost-effective material and one that already exists naturally in the environment. My grandfather, John Weir of Seattle, an avid 12-gauge trap shooter, reloaded his own ammo, used tons of lead shot, and went shooting every other week or so for 35 years with no health problems whatsoever.

Using tungsten and other materials would cost a whole lot more than using lead. In addition, using tungsten for ammo is a very poor choice due to the difficulty of fabricating it because it has the highest melting point of any metal element at 3,422 degrees Centigrade, or 6,192 degrees Fahrenheit, which is exactly why it has MUCH better applications in super alloys and other much more critical uses. Also, China has about 75% of the world supply of tungsten, while the US produces none. Tungsten is not a very good alternative is it? When lead is plentiful (melts at only 327 degrees centigrade, or 621 degrees Fahrenheit) and available in the United States, and is far less expensive than tungsten.

Compare the availability lead to bismuth in the world metals markets. The world refined 12,000 tons of bismuth in 2006 compared to 8,127,000 tons of lead in 2007. The availability of bismuth as a viable substitute for lead as far as a practical, available alternative could not be poorer. Bismuth costs about 10 times as much as lead. It is nearly the same with tungsten in that regard, with only 37,400 tons of concentrates being produced in 2000. This is not a metal supply situation that I would want to risk in the right to bear arms.

The environmental movement has been demonizing lead as a very dangerous material, which is just not true! Untold billions of people have used it safely for thousands of years because the benefits far outweigh any other considerations. Sure, we have learned that it is not a good idea to eat lead or to make our drinking water pipes out of lead, but that is about where any real danger ends. When used properly and safely, lead's effect on the entire environment has always been negligible.

The environmentalists' zeal has gone way too far – it's all about safety now. They say lead is not safe; of course it's not, in certain instances as mentioned above. Well, living life will never be completely safe, because the earth is a dangerous place and always will be no matter what any government does. All that this excessive banning of lead will accomplish is to restrict further what one more group of people can do, creating less freedom for all of us.

Please reschedule the public meetings as suggested above so that the Washington State firearm dealers, owners and shooters can participate.

Sincerely,



Paul Weir
206-817-3412

From: paul weir
Sent: Sunday, October 05, 2008 10:31:48 AM
To: Davies, Holly (ECY)
Subject: Re: Draft Lead CAP comments

Hello Holly,

Thanks for your prompt reply, I have been quite busy lately, we understand that since about 20% of the population are gun owners that sometimes some people do not know any gun owners that they can get this information from.

I did look through the lead CAP, that's what I based my initial letter on, these documents look like they were put together by a government committee with the help of some academics who are also environmentalists etc with the express purpose of making lead look much more dangerous than it really is. The NRA believes (and I agree) that this voluntary lead CAP is only the initial step and in 2 or 3 years these same groups and this government will most likely be back asking for a total lead ammo ban, like what happened in Arizona, (trying to spread the disease state to state) which it looks like was recently defeated 2 to 1. And to justify banning it. This is always the way the government and these groups work, incrementally

Also the idea that lead wheel weights from automobiles harming wildlife or the environment is also laughable, these weights are part of the car, sure a few may fall off but not that many considering the number of cars out there. And again the effect is negligible.

Thanks, Paul Weir

--- On Wed, 9/24/08, Davies, Holly (ECY) <hdav461@ECY.WA.GOV> wrote:

From: Davies, Holly (ECY) <hdav461@ECY.WA.GOV>
Subject: Draft Lead CAP comments
To: paulweir111@yahoo.com
Date: Wednesday, September 24, 2008, 10:52 AM

Mr. Weir,

Thank you for your faxed comments on the Draft Lead CAP. There is no proposed ban on lead ammunition in the Draft Lead CAP. We would like to work with hunters and shooters to promote non-toxic alternatives to lead without negatively affecting hunting or shooting areas. We are aware that there are not good alternatives to lead for some uses and do not intend to force people to use inappropriate ammunition.

It is unfortunate that the only sportsman on the Advisory Committee was a fisherman. We tried to include a wide variety of people, but we did not know ammunition was such a large use of lead when we started. In retrospect, we wish we had included a hunter or shooter. However, even if a hunter or shooter had been on the committee, we would still want to work with the larger community. We have been working with a representative from WDFW and there are people involved who are hunters and shooters, even though they were not officially representing hunters or shooters. We did contact the NRA earlier about the Lead CAP and they did not respond.

My response is much shorter than your letter and I am not addressing every point you made. I hope the assurance that we are not proposing any ban on any lead ammunition will reassure you that we are not going to affect any of the activities you detailed. We are required to look at all options, and we considered the option of banning different lead products, including ammunition. After considering all the options we decided the best recommendation was to work with stakeholders on voluntary steps. We also agree that the cost of alternatives is an important consideration.

Please take a look at the focus sheet we prepared about lead ammunition and the Draft Lead CAP. I've attached the fact sheet to this email or you can access it at:
<http://www.ecy.wa.gov/programs/swfa/pbt/leadcap/>

Sincerely,

Holly Davies, PhD
Chemical Action Plan Developer
SWFAP/ Industrial
WA Department of Ecology
PO Box 47600
Olympia, WA 98504-7600
Phone: 360.407.7398

Fax: 360.407.6102

From: Pete Weller
Sent: Thursday, September 18, 2008 3:46:35 AM
To: Davies, Holly (ECY)
Subject: Lead CAP

To Whom It May Concern:

Not in Washington...please tell me that we are not thinking about this in the state of Washington. One might expect this from California or Massachusetts but not here at home. We can't run off and outlaw ammunition. There is no affordable and workable substitution yet and this seems extremely restrictive on civil liberties. I wonder if a ban on ammunition would even stand up to constitutional muster. Sure, they don't care about this stuff in California but here in Washington we seem to care a bit more about the people's freedom.

Then there is the other side: if the Department of Ecology is going to pursue this then they are looking for a hell of a fight. I really don't think that all of the gun owners and 2nd Amendment believers in this state are going to sit quietly for this. Do you really think this isn't going to cause a lot of trouble? Do we really want to be held hostage by the small but loud fringe that always screams for the environment at any expense? Don't they really think that we should all walk or peddle everywhere and light our way with lanterns? Don't they always scream against man and machine in case they are to harm nature. Are we really going to ban lead ammunition because of them...in Washington?

I could ramble on but I am getting angry. No Lead Ammunition Ban.

Pete Weller

Associate Broker
Windermere Real Estate/Central, Inc.
(206) 650-7383 Cell
(425) 827-1075 Fax
pete@weller4property.com

From: Eve Wellington
Sent: Saturday, October 04, 2008 10:48:34 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Eve Wellington
PO Box 1422
Edmonds, WA 98020-1422

From: gail
Sent: Thursday, September 18, 2008 10:00:50 AM
To: Davies, Holly (ECY)
Subject: Support CAP

I support the scope of the CAP program. Please act on this, as soon as possible.
Thank you,
Gail Werner

From: joanne colman wester
Sent: Thursday, October 02, 2008 12:24:27 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

There is no safe level of lead. Please support a comprehensive plan to phase out all unnecessary lead exposures in consumer products and policies that will eliminate all lead use in manufacturing in Washington state,

Sincerely,

joanne colman wester

concerned parent and teacher

joanne colman wester

PO Box 451

Shaw, WA 98286

(360) 317-8896

From: Mathilda Wheeler
Sent: Friday, October 03, 2008 2:25:20 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Mathilda Wheeler
2230 Utter Street
Bellingham, WA 98225

From: Leonard Whitney
Sent: Tuesday, September 30, 2008 6:10:14 AM
To: Davies, Holly (ECY)
Subject: Banning lead Shot

There are ways to make lead non toxic as described in this synopsis of the patent below the costs of banning lead shot altogether would be enormous.

United States Patent 4714023
Brown, John E. (8 Northwood Dr., St. Catharines, CA)
Application Number:
06/844519
Publication Date:
12/22/1987
Filing Date:
03/27/1986

DETAILED DESCRIPTION OF THE PREFERRED EMBODIMENTS

According to this invention, the superior ballistic properties of lead are retained for the shot while the nickel-phosphorous coating resists abrasion and degradation in the gizzard of the waterfowl, so that the lead is not broken down in the gizzard, but rather the shot passes harmlessly through the digestive system of the waterfowl and is excreted from the body. A nickel-phosphorous alloy coating, as provided by the electroless nickel plating process, therefore, is successful in alleviating the toxicity problem while other coatings, including prior types of nickel coatings, have not been.

A further significant advantage of the nickel coating is that damage to gun barrels is insignificant even though the nickel-phosphorous coating is a hard metal, thereby enabling a serious defect of iron and steel shot to be overcome. The thin nickel alloy coating permits the shot engaging the gun barrel walls to deform sufficiently to avoid damage to the barrel, in contrast to steel shot which has a considerable peening effect, especially when full choke barrel guns are employed.

Tests have shown that the nickel-phosphorous coating for the lead shot at a Rockwell hardness in the range of 50 is not harmful to waterfowl. The coating has a sufficient hardness and abrasion resistance to avoid degradation in the gizzard of the waterfowl so

that the lead is not exposed to the digestive system of the waterfowl, which could result in lead poisoning. Depending upon the loadings for the ammunition, it is appreciated that increased Rockwell hardness for the coating may be desired and at these higher ratings for the coating hardness, it has been found that there is no significant effect on poisoning of waterfowl. As the coating is heat treated to achieve the increased Rockwell hardness, the amorphous nickel-phosphorous alloy is precipitated out in the form of Ni₃P, Ni₇P₃ and Ni₅P₂ phases of the nickel-phosphorous alloys which provide for the increased hardness of the coating.

Accordingly, the thickness of the nickel-phosphorous alloy coating applied by this invention is at least sufficient to enable the coating to resist the abrasive and degradative effects of the gizzard of the waterfowl. In addition, the nickel coating is not so thick that the dimensions of the shot are significantly altered and that any significant gun barrel damage occurs in use.

The shot of the present invention, as coated with the nickel-phosphorous alloy at the various degree of hardnesses, is able to deform on impact, but such deformation does not result in the splitting open or flaking off of the nickel-phosphorous alloy coating. Instead, the integrity of the coating is maintained so that lead does not become exposed to waterfowl which may ingest the lead. The lead shot pellets of the present invention may be loaded into conventional types of shotgun shells and the like with or without buffer materials as desired for use. The ballistic characteristics of the shot when fired from such shells are unaffected by the nickel-phosphorous alloy coating.

It has been found that the smoother nickel-phosphorous alloy coating for the lead shot, when loaded with buffering materials, exhibits a superior impact pattern compared to standard lead shot in tests conducted at approximately forty yards distance.

Although preferred embodiments of the invention have been disclosed herein in detail, it will be understood by those skilled in the art that variations may be made thereto without departing from the spirit of the invention or the scope of the appended claims.

From: Den Mark Wichar
Sent: Thursday, October 02, 2008 7:51:59 AM
To: Davies, Holly (ECY)
Subject: Stop Lead Pollution, Save Lives

To: Holly Davies, PhD
Dear Ms. Davies
I support strongest possible Lead Chemical Action Plan.

Lead is a major neurotoxicant, which affects children's brains in smallest doses. Lead should not be in air we breathe, food we eat, water we drink, or products we bring into our homes.

Current draft plan contains some encouraging recommendations, including recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly.

Specifically, the plan should include these recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.

- ? Lower state's blood lead action levels for children, workers, and other sensitive populations to reflect goal of zero exposure and help health officials better protect these populations.

- ? Establish policies and programs to allow state to address toxic chemicals in more comprehensively, including requiring manufacturers to test and disclose chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in vanguard in protecting public health and environment from toxic chemicals.

Den Mark Wichar
711 W 25 St
Vancouver, WA 98660

360-694-3703

From: Wick, David
Sent: Thursday, September 18, 2008 6:02:45 AM
To: Davies, Holly (ECY)
Subject: Please, lets be reasonable.

Lets concentrate on the real lead issues. The lead from bullets is not a treat to our environment. There are other lead filled item we should be more concerned with. We allow Lead in things such as fishing weights, anchors, batteries, etc. Are we ready to ban the purchase and ownership of these items? Lead is already banned in water fowl hunting. The only time I use a lead bullet is when I am target practicing or when I hunt game for food. When I target practice it is under controlled conditions (the bullet being recovered and recycled) at a shooting range and when I hunt I don't shoot until the target is in sight and identified. I don't miss and use very little ammo over all. Why do they want to attack the hunters again on such a pathetic issue.

David Wick

dwick@bechtel.com

Office: 509-373-8294

Home: 509-543-9007

Cell: 509-302-0580

From: Jane Wiebe
Sent: Friday, October 03, 2008 12:33:03 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Jane Wiebe
15706 Greenwood Ave N
Shoreline, WA 98133

2063653639

From: Wiggins, Gary
Sent: Monday, September 29, 2008 11:06:17 PM
To: Davies, Holly (ECY)
Subject: Lead Ban

Ms. Davies, it was an unpleasant surprise to learn of the intended ban on lead sinkers and bullets. Such a ban would have a very negative effect on all fishermen, hunters and sports shooters. It would also negatively affect the over 600 dealers in WA who earn their livings by such sales. I would include that taxes are paid to the state from these sales. I am aware of the noble desire to protect wildlife from the toxic effects of lead, but aside from bismuth (lead shot substitute) there are currently no alternatives. Is the proposed ban based on documented scientific study? If so, please reference the study for my information. Also, my representatives will be made aware of my concerns (shared by many) as I believe that this issue would be best dealt with by the elected legislature. Please make my comments part of the record.

Thank you,

Gary Wiggins

Anacortes
WA

From: Elaine Willey
Sent: Saturday, October 04, 2008 6:09:36 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

Our family supports a strong Lead Chemical Action Plan.

Because lead is a potent neurotoxicant, which affects children's brains in the smallest doses, it should not be in the air we breathe, food we eat, water we drink, or products we bring into our homes.

The current draft plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

Let's keep Washington in the forefront in protecting public health and the environment from toxins.

Sincerely,

Elaine Willey
3665-50th Ave. NE
Seattle, WA 98105

206/854-8230

From: The Williams

Sent: Friday, September 19, 2008 6:00:46 AM

To: Davies, Holly (ECY)

Subject: banning lead bullets

What on earth are you thinking? We don't eat lead.(on purpose anyway) We don't go around putting bullets in our mouths.

There is not an alternative to lead for bullets for game hunting, or personal protection. There is more lead in a car battery than any one person will shoot in a gun in their life time. And if we end up with electric hybrids all over the place there will be more lead exposure and potential accidents than all of the lead bullets that exist now.

I am not in favor of a lead bullet ban in the state of Washington or anywhere else for that matter

Dick Williams

From: Jay Williams
Sent: Thursday, September 25, 2008 1:58:53 PM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Dear Ms. Davies,

I shoot competitively on an international level and the only ammunition used in international competition is lead ammunition. If lead ammunition is ban from the State of WA, no one in the state could train for the Olympics. Rifle, pistol and shotgun shooting use lead ammunition; there is no substitute. There have been many Olympic shooters from Washington State, in fact WA State has some of the highest concentration of great shooters this country.

Banning lead totally for all ammunition is going over board. That's like banning all cars because it is one of the leading causes of deaths and injuries in this country. Or banning all alcohol because it causes drunk drivers to kill innocent people. I don't like to see toxic amounts in our environment either, however a total ban would not allow anyone to train air gun in our own house; which is another Olympic sport.

Jay Williams
Vancouver, WA

From: jim williams

Sent: Friday, September 19, 2008 9:29:08 AM

To: Davies, Holly (ECY)

Subject:

Regarding the proposed ban on lead bullets for hunting. I ask that you do a study that involves factual cases of "bullet caused" lead poisoning and not simply take the word of groups who may have a different agenda.

As in California where condors were used as the "sympathy" icon. There have been reports from some respected researchers who found condors were subjected to more exposures to lead (and other harmful substances) which had no contribution from hunters.

While public safety should always be foremost, I ask that you also consider that there are many people who use hunting to contribute to their annual food supply, not to mention the amount of revenue raised from sportsmen. And contrary to what many of the "no lead" group say, it would have a serious effect on hunters.

From: Kenneth Williams
Sent: Monday, September 29, 2008 2:09:01 AM
To: Davies, Holly (ECY)
Subject: Lead bullets

Dear Sir,

There is no adequate substitute for lead ammunition and that any affects on humans and wildlife do not justify a ban on this ammunition, This is just another plan to subvert our second amendment rights.

Respectfully,
Kenneth Williams

From: f m
Sent: Friday, September 19, 2008 9:20:21 AM
To: Davies, Holly (ECY)
Subject: Washington state proposed lead ban

Sir, I have just been informed about the possibility of banning lead bullets in the state of Washington. As a hunter and target shooter lead bullets are essential. The only substitute in some ammunition is an all copper bullet for hunting which are very expensive. For the sport of black powder muzzleloading and black powder rifle cartridge rifles lead is the only element that can be used in these rifles. Making a ban on lead would bring to an end to recreational shooting of these arms. A lot of sportsman would be affected. I hope you will take the time to really think this lead ban over carefully. In California there is a lead ban in effect for about one third of the state. This is to protect the cal. condor. It affected a lot of folks here quite negatively. Just my two cents.

Sincerely, Mike Williams in Weaverville, Ca.

See how Windows connects the people, information, and fun that are part of your life. [See Now](#)

From: John Willis

Sent: Thursday, September 18, 2008 4:44:59 AM

To: Davies, Holly (ECY)

Subject: Stop the silly talk about banning lead bullets! It sounds good to the eco-freaks and accomplishes NOTHING!

Another dumb idea to make the eco-freaks "feel good" and another meaningless attempt on the part of a bloated government to cater to them! Stop the silliness NOW!

John Willis
Grapeview, WA

From: David Willson
Sent: Wednesday, September 24, 2008 12:55:08 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Ms. Davies,

I disagree with the Lead Chemical Action Plan (CAP) as it appears to be strongly biased and thus does not adequately address the consequences of banning lead or reasons why concentrations are forming at a few select locations in the state. Lawful hunters and shooters are capable of managing lead exposure in a safe and responsible manner. Lead is both inexpensive and the most effective material available to capture game in a humane manner.

Exposure to lead in the environment is generally not concentrated in the manner promoted by the Department of Ecology. The department's citation about lead contamination at one isolated place in the Capitol Forest is the exception not the rule. For example, it would take about 560,000 .45 caliber lead bullets fired into a slightly acidic small pond 50 yards by 50 yards and ten feet deep (about 70,000 rounds of #8 lead shot) before the water would violate the 15 part per billion federal standard for municipal water supply. This illustrates that exposure to dangerous lead in typical hunting scenarios is unlikely. Surely, after a few hundred thousand rounds fired at the same narrow backstop, long before the lead concentration reaches toxic levels, the game animals would keep clear of the area.

Yes, there are some places such as the popular shooting site at the gravel quarry in the Capitol State Forest where the lead ammunition has reached toxic levels, and this will be expensive or difficult to clean up. Perhaps, one reason why these places exist is because there is pressure to close formal shooting ranges where lead contamination and exposure can be controlled in a more effective way, not to mention the public safety measures incorporated into the design of these ranges.

Non-lead ammunition substitutes are generally more expensive and in the case of more affordable steel shot, less effective at taking game in a humane manner. While lead levels in our marshes may have dropped, it is more likely that wildlife has been crippled by missed shots. Also, some of the non-lead ammunition contains other heavy metals which have not been studied as intensively as lead. We may find out some day that exposure to high levels of tungsten is also hazardous to children or kills frogs. For now, tungsten is good just because it is not lead.

My recommendation to the Department of Ecology is to continue to produce educational materials which promote responsible management of lead in the environment. To take a leadership position and encourage the development of shooting ranges so that lawful citizens have a safe place to practice marksmanship and lead contamination can be controlled. Finally, that inexpensive and effective lead ammunition not be restricted in Washington for the purpose of the humane taking of game.

Sincerely,

David Willson
175 SE 10th Circle
North Bend WA 98045

From: Jerry & Cathie

Sent: Wednesday, October 01, 2008 9:03:05 AM

To: Davies, Holly (ECY)

Subject: Lead Ammunition

First off, I will state that I feel what you are attempting to do, is anti hunting. So does my state Senator, Jim Honeyford. I am talking about the Washington State Lead Chemical Action Plan. The study of the diet of Cree Indians diet in Northern Ontario concerning game shot with lead ammunition has been implicated in their high lead levels. How convent. Perhaps instead of reading Tsuji et al. 2001, you should read Outdoor Life magazine, 2008. You would not have had to dig for a study in some obscure location. The state of Iowa, that's in the United States, has been drawing blood from children and adults who eat wild game, for years, and no elevated lead levels have been found.

Thank you for your time and consideration in matter.

Jerry Wilson
17 Soda Springs Road
Goldendale, WA 98620
jctoddlee@gorge.net

509 773-6039

From: keira Wilson
Sent: Friday, October 03, 2008 9:06:59 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

I am livid to know that vinyl products may contain lead. Vinyl table cloths are used to eat off of in our preschool, and in Washington our children wear rain coats and rain boots. I feel let down by our leaders. I would also like to add that I have not been purchasing as many products in town, opting for imports from Germany and Sweden. I know many parents that do much the same. I think this in turn is not great for our own community, economically. Just my two cents!

Sincerely,
Mama of two
Keira Wilson

keira Wilson
4536 juli ct se
oly, WA 98501

From: Sheila Wilson
Sent: Friday, October 03, 2008 3:53:22 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Sheila Wilson
1140 Bethel St NE
Suite 540
Olympia, WA 98506

36056510203

From: winchg@u.washington.edu
Sent: Friday, September 26, 2008 7:07:33 AM
To: Davies, Holly (ECY)
Subject: Lead Ban

Dear Ms. Davies:

After reviewing the Draft Lead CAP proposal, it still appears to me this is a back-door attempt to ban lead ammunition in this state. I want this proposal scrapped, and I will advise Governor Gregoire accordingly.

Sincerely,

Greg Winchell
9025 48th Dr. NE
Marysville, WA. 98270

From: Greg Winchell
Sent: Thursday, September 18, 2008 9:13:34 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

I do not approve of the attempt to ban sales and use of Lead ammunition...there is no affordable substitute. I support the NRa on this issue.

Greg Winchell
9025 48th Dr. NE
Marysville, WA. 98270

From: Marguerite Winkel
Sent: Thursday, October 02, 2008 7:35:00 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Marguerite Winkel
2012 W 3rd
Spokane, WA 99201-5465

(509) 455-9937

From: Charles Winters
Sent: Sunday, September 28, 2008 11:50:29 PM
To: Davies, Holly (ECY)
Subject: Lead in ammunition

Reference: Draft Lead Chemical Action Plan (CAP), Department of Ecology
Publication No. 08-07-009

Dear Ms Davies: I can understand and support the mandated use of lead-free ammunition in certain hunting situations where birds are at risk. But please refrain from banning lead ammunition from all uses.

For example, lead fragments in offal piles left in the forest during deer and elk hunting are typically scavenged by coyotes and other mammalian species, not birds. Mammals do not have gizzards and therefore are not at any particular risk of lead absorption from the fragments. Same goes for the hunters who eat the venison. The lead fragments are passed through the digestive tract without significant absorption. Also, lead in the soil at target shooting areas is not a particular risk to any species, including birds. If you watch how birds gather grit, they tend to go to riparian zones where sands and gravel are spread out by size for the easy taking. Its highly unlikely a dirt backstop at a shooting range will attract birds seeking grit.

In summary, lead is a useful substance that is also toxic under certain conditions. Its appropriate to protect humans and wildlife from uses that endanger them, but its not appropriate to implement widespread bans on the substance where its not necessary.

Yours Truly, Charles Winters, 770 Highwood Dr, Issaquah WA 98027

From: Sydney Wissel
Sent: Thursday, October 02, 2008 11:36:23 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Sydney Wissel
2449 34th Ave W
Seattle, WA 98199

From: Beth Wofford
Sent: Friday, October 03, 2008 4:37:32 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Beth Wofford
1306 159th Avenue SE
Bellevue, WA 98008

From: Esther B. Wolf
Sent: Thursday, October 02, 2008 8:43:08 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Esther B. Wolf
4009 30 Ave. w.
Seattle, WA 98199

From: Rebecca Wolfe
Sent: Thursday, October 02, 2008 2:41:14 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD
Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Rebecca Wolfe
1124 Second Ave. S.
Edmonds, WA 98020

From: INV 147

Sent: Thursday, September 18, 2008 10:20:23 AM

To: Davies, Holly (ECY)

Subject: Public Comment on Lead Bullets

I am opposed to the banning of lead bullets. In my opinion the banning of lead shot was enough. (Yes I read your articles on lead poisoning.) The banning of lead bullets will hurt many of us who are sportsman. I can't help but feel this is a back door approach to limiting the use of firearms.

Sincerely,

Glenn Wong

From: Gordon Wood
Sent: Thursday, October 02, 2008 11:26:50 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Gordon Wood
906 Lake Washington Blvd S
Seattle, WA 98144

(206) 851-0141

From: Michael Wood
Sent: Thursday, September 18, 2008 6:24:26 AM
To: Davies, Holly (ECY)
Subject: Lead Chemical Action Plan

Good Day,

I am writing in regards to the Lead Chemical Action Plan currently being proposed. I see a serious error in your plan. Unlike waterfowl hunting, there is a very limited choice in alternative metals to lead in rifle and handgun bullets. Those that do exist come at a very high price tag. Not too mention there are groups of handloaders that currently cast their own bullets with lead. For the bullet casters out there, I have yet to see or hear of an alternative metal that could work. I as a shooter know the risks of lead and I am confident in my own judgment to use lead bullets in spite of lead's alleged risk that it may pose.

Please also refrain from using California as an example. The condor protection act is absurd. It doesn't take a genius to figure the odds of a condor ingesting lead when there are what approximately only 20 or so condors in the wild spread out over hundreds if not thousands of square miles. I grew up and hunted in California for over 20 years. I have yet to ever see a condor in the protective zones never the less die from lead poisoning.

The only conclusion I can draw from this proposal is that it is another ploy masquerading as a health issue to impede on my rights as a lawful gun owner and shooter. Lead is a natural element, not man made, it exists in nature. As such it should not be restricted in ammunition. I am aware of many "Anti-gun" groups out there who wish to target the ammunition for banning now, especially in light of the recent Supreme Court's ruling and upholding of the 2nd amendment. When they can't go after the guns, they go after the ammunition.

This is one proposal that should be shelved and forgotten about.

Thank You.

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From: handgnr@centurytel.net

Sent: Friday, September 19, 2008 5:57:04 AM

To: Davies, Holly (ECY)

CC: Steve Pew; office@washingtonarmscollectors.org;
danointhenw@centurytel.net; Ujhammer@aol.com; leeguns@hotmail.com;
woodymathews@hotmail.com; rgrwjb@hotmail.com;
jim@universalcorporate.com; spindleblaster@msn.com; boyd@seanet.com;
protect2ndamd@comcast.net; rickbrooker@msn.com;
parabellum9@aol.com

Subject: Re: Fwd: Proposed ban on lead based ammunition

Dear Holly:

I am in receipt of several e-mails regarding a draft lead CAP in which you have explained there was no hunter or shooter on your advisory committee, but there was a representative from the Department of Fish & Wildlife.

I submit to you that a WDFW person does not represent hunters or shooters in this state, and only represents the interests of the agency, which at times are not the same as the interests of hunters and shooters.

While I have seen assurances that this draft does not propose any further bans on lead ammunition, I will be reading the document carefully to ascertain whether that is accurate.

Regards

Dave Workman

Senior Editor

GUN WEEK

12500 N.E. Tenth Place

Bellevue, WA 98005

(425) 454-7012

From: BRUCE WRIGHT

Sent: Friday, October 03, 2008 11:56:23 PM

To: Davies, Holly (ECY)

Subject: lead ban

I say no the the proposed lead amunition ban . Lead is a natural accuring mineral found in Washington state as well as aspestos , mercury and a host of other potentially deadly minerals . These minerals do not have to be refined in order to be deadly .

This is a direct attack on the hunting and fishing community , that will have the Trumpeter Swans as the scape goats for the EPA , just as the Spotted Owl was/is for the anti-logging folks . The source of the lead found in the poisoned swans found in Skagit, Whatcom counties as well as British Columbia has never been determined .

I'am a register voter in the state of Washington as well as my wife .We will not be voting for any Democrats this fall because of attacks like these on my traditions,culture and rights .

Bruce Wright
Clayton,Washington

From: Jim Wright
Sent: Saturday, September 20, 2008 2:11:14 AM
To: Davies, Holly (ECY)
Subject: Proposal to ban lead ammunition

Dear Governor Gregoire:

I have just been informed that the Department of Ecology would like to ban the lead ammunition I use for hunting and recreational shooting. I will not be able to own, purchase, or use lead ammunition in my great state of Washington.

I consider myself a conservationist. I am all for conserving our great outdoors so that all of us can enjoy what God has given us. It is called stewardship. I also believe that one can use information and statistics to justify their own personal beliefs and agendas. I know the importance of containing toxins such as lead. California outlawed the use of lead ammunition in certain locations even though there is no scientific proof saying that lead is the problem. The report from the Department of Ecology stating that there is a location in the Capital Forest that is contaminated from lead ammunition is a concentrated location used by citizens. This does not represent areas that are not part of this concentrated location.

I strongly urge that you find out non bias information regarding the toxins produced by lead ammunition - not just the data that is given to you by the Department of Ecology. Their data is distorted and is not a good sample of all data available to them.

Jim Wright

From: Josh Wright
Sent: Thursday, September 18, 2008 11:53:21 AM
To: Davies, Holly (ECY)
Subject: lead ammunition

By passing a law against purchasing lead ammunition, you subsequently kill any opportunity to hunt any game, big or small. By doing this you without giving an affordable alternative, you are violating the 2nd amendment in the bill of rights, therefore violating the Constitution. By banning the ammunition, you're not just making hunting difficult, if not impossible, you're keeping good, hard working americans like me from getting the chance to fulfill an american tradition and passtime. If you decide to overturn this ban, you will be doing the good, law abiding hunters a favor and keeping the american tradition of hunting alive and well. I do understand why you would ban lead ammunition because of how harmful it is the environment and to the public, but unless there is an affordable alternative that won't break the bank for hunters, you won't have the support from me or any other hunters in Washington State.

Do you want us to stop us from passing an american tradition from generation to generation? Because with this ban taking effect, you're doing exactly that!

Sincerely,

Josh Wright

From: Donna Yancey
Sent: Thursday, October 02, 2008 12:52:09 PM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, and cosmetics.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Donna Yancey
4202 Phinney Ave. N #3
Seattle, WA 98103

206 632-2363

From: Peter Yocom
Sent: Wednesday, September 24, 2008 11:58:13 AM
To: Davies, Holly (ECY)
Subject: Lead CAP

I appreciate the opportunity to comment on the proposal to ban lead shot. I reviewed it and found the arguments to control the prevalence of lead in the environment compelling. However, I found the methodology used to determine how much lead contamination came from lead shot to be weak. A great deal of the argument involved the mortality of waterfowl as the result of lead shot. Lead shot has already been banned for the use against waterfowl, and in use in selected areas in Washington. My main concern is the use of lead shot for skeet, trap, sporting clays, and upland game. The cheapest alternative proposed is steel shot, at an estimated \$13 million increase in cost to the shooter. I shoot a lot of sporting clays. I have one shotgun that can handle steel shot and it is not a competition shotgun. The rest would be rendered useless. Unless a feasible alternative is proposed (and I view steel shot as unacceptable solution), I cannot endorse this proposal.

Thank you for the opportunity to comment.

Peter Yocom

From: Heidi Zamzow
Sent: Thursday, October 02, 2008 9:43:35 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

As a heavy metals chemist, I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

- ? Eliminate all unnecessary exposures to lead from consumer products, including vinyl products, clothes, cosmetics, and household appliances.
- ? Lower the state's blood lead action levels for children, workers, and other sensitive populations to reflect a goal of zero exposure and help health officials better protect these populations. THERE IS NO "SAFE" LEVEL FOR LEAD.
- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Heidi Zamzow
1178 NW Pioneer Hill Rd
Poulsbo, WA 93950

(360) 779-9021

From: Olga Zharkova
Sent: Friday, October 03, 2008 5:42:23 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

Holly Davies, PhD,
Department of Ecology
PO Box 47600
Olympia ,WA 98504-7600

Dear Ms. Davies,

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Olga Zharkova
7919 236th St. SW
Edmonds, WA 98026

From: jzierdt@earthlink.net
Sent: Monday, September 22, 2008 4:46:03 PM
To: Davies, Holly (ECY)
CC: jzierdt
Subject: Against the ban on lead in Ammunition

Attn:Leadcap

My background as a Washington State Citizen includes former duty as a Lt. Colonel in the Washington State Guard, and I am presently a volunteer as a Firearms Instructor in the Washington State Hunter Education program (for over Ten years).

While lead shot is banned in waterfowl hunting; other metals substitute marginally for lead in shotgun ammunition. Such is not the case with other than shotgun ammunition where there is no adequate substitute for lead.

Banning lead in ammunition would disarm and cripple our Law Enforcement, our Military as well as hunting, sport shooting and our Citizens' right to self protection.

Your efforts to ban lead in ammunition smacks of a backdoor attack on our Nation's Second Amendment Rights.

Jerald F. Zierdt, Major USAFRegRet
1409 W NORTH Dragoon Drive
Colbert WA 99005
(509)276-5250

jzierdt@earthlink.net
EarthLink Revolves Around You.

From: Bob Zimmerman
Sent: Monday, September 22, 2008 3:18:32 AM
To: Davis, Kathy L. (ECY)
Subject: Lead ammo on target ranges

To whom it may concern,

The use of lead on target ranges where the lead is confined to an impact area is not a hazard to public health or wildlife. Antique style muzzle loading firearms will not perform with any other substitute because the lead projectile has to “bump up” to engage the rifling. Many target rifles from the late 19th century only shoot cast lead bullets. They will not shoot jacketed bullets. The bullets need to be soft enough to be pushed into the rifling at the breech. Again, lead confined to target range impact area is not a hazard.

Thank your for your consideration,

Sincerely,

Robert W. Zimmerman

From: Matt Zublic
Sent: Thursday, September 18, 2008 5:06:19 PM
To: Davies, Holly (ECY)
Subject: lead exposure

Greetings,

I am writing on the occasion of voicing my opinion on the proposed ban of lead in ammunition.

The 'Focus on Lead Ammunition' point paper states "The goal is to lower the amount of lead people are exposed to," however, I am not aware of any health epidemics as a result of high lead levels. The one quarry referred to in the point paper has high lead concentration because of the nature of the area (defacto shooting range). Instead of radically changing ammunition, why not set up public gun ranges where the lead level and exposure can be controlled. If the public ranges was open, free to the public, people would go to said ranges instead of randomly firing weapons in the public areas of WA (legally allowed). To me, the proposed action is a roundabout way to severely limit hunting and firearm usage. I do not disagree with the decision to go lead free when hunting waterfowl. However, that decision and subsequent legislation were determined by significant research and scientific evidence. Even the California Condor the point paper refers to, is based on a specific threat to an animal species and in a limited area. However, the argument of the point paper is to limit lead exposure to people and again I go back to my original statement of - where's the evidence there's an epidemic in humans from lead exposure directly linked to ammunition. This is not a well thought out or organized point paper. If PEOPLE are the priority, then make that point; don't refer to California Condors or legislation that is already been enacted to resolve the issue of lead shot in waterfowl areas. Until a case can be made about toxic HUMAN exposure, this is a moot debate.

Very Respectfully,
Matt Zublic
360-941-3109

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From: Jon Zurit
Sent: Thursday, October 02, 2008 11:45:31 AM
To: Davies, Holly (ECY)
Subject: Strengthen Lead Action Plan

To: Holly Davies, PhD

Dear Ms. Davies

I am writing to express my support for a strong Lead Chemical Action Plan.

Lead is a potent neurotoxicant, which affects children's brains in the smallest doses. Lead has no business being in the air we breathe, food we eat, water we drink, or products we bring into our homes.

While the current draft plan contains some encouraging recommendations, including the recommendations to eliminate lead exposure to children in housing, the plan must be strengthened significantly. Specifically, the plan should include the following recommendations:

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- ? Establish policies and programs to allow the state to address toxic chemicals in a more comprehensive way, including requiring manufacturers to test and disclose the chemicals in their products and helping manufacturers identify safer alternatives to lead.

These improvements will keep Washington State in the forefront in protecting public health and the environment from toxic chemicals.

Sincerely,

Jon Zurit

1

Fairfield, VT 05455-5570

(802) 524-5437

Comments submitted Anonymously

From: bertmargerou

Sent: Friday, September 19, 2008 1:43:06 AM

To: Davies, Holly (ECY)

Subject: lead ammo ban

Lets not stop at ammo there are millions of lead/acid batteries in cars,trucks and back up power systems. Not to mention all the lead the military and police spray and pray with. Gee, then even other countries can come in and sue the US for clean up of all the lead used in war games. Yep sounds like a good deal to me. The only winners will be the drug gangs cause now you got to get close enough to taser them...no more swat teams! All because a group of idiots think they can do away with all violence by doing away with guns and hope the law dogs can get there in time to help you. (last time I called the cops it took them 35 minutes to get here from 8 blocks away.)

From: bobl28@peoplepc.com

Sent: Friday, September 19, 2008 9:10:34 AM

To: Davies, Holly (ECY)

Subject: lead ammunition

there is no suitable substitute for lead bullets. This is just some more anti hunting stuff.

From: brittney f
Sent: Thursday, September 18, 2008 8:08:02 AM
To: Davies, Holly (ECY)
Subject: Anti-lead legislation in ammunition

I support anti-lead legislation in ammunition and hope it passes.

I was on a online hunting forum about this lead ban in the state of Washington, and I am against it because I can't afford steel slugs everytime I go shooting at the range. In reality, what animal is going to be eating a big mangeld up slug? Water foul, that I understand. But anyother bird I highly doubt it. Besides on all lead products that we handle for fishing and hunting has a lead "warning". In order for a person to get lead poisoning, they must be pretty stupid to actually eat the whole thing. I work for a organization that deals with lead on the exterior walls that i insulate. I do not do the lead safe practise (except for 6mil poly plastic for easy clean up) just because takes too much time and slows progress down. Been doing this for years now and I go in to get lead blood work done and every single time I am fine. Heck, I handle fishing weight lead all the time and bite on it to close it on my line and I also do reloading..... Old people back in the day grew up with lead paint on their cribs and everything and they didnt die or get harmed by lead. They died and got harmed by tobacco products... All that I am saying is that if you ban lead permitley from Washington State, your going to have a lot of upset sportsman that cannot afford steel or anyother metal for bullet reloading or fishing.. Heck, for a thing of lead balls for making slinkies is already up pretty close to \$20. Jumped \$5 more than a few years ago... This country is already screwing us for gas and food, why screw us in our hobbies?

I am totally against abolishing lead ammunition for hunting and shooting sports. If I wanted to live under California laws I would live in California. You environmentalists have done enough to ruin this great country, just look at our lack drilling in our non existent energy policy. Move to California and take the Governor with you. Native born Washingtonian

From: Fox Mulder
Sent: Friday, September 26, 2008 12:24:26 PM
To: Davies, Holly (ECY)
Subject: a comment on your lead ammunition ban

I've been a Washington State resident all of my life and I just had a couple of things to comment about this lead ammunition ban.

First, I would like to add that I am an avid shooter who does use lead ammunition for when I go out shooting for fun.

Second, I oppose a policy that would ban lead ammunition in the State of Washington for recreational use by shooters.

Third, honestly I just don't see any adequate substitute for lead ammo anyways. In my eyes, it would be a loss of the right to use/buy lead ammo. Lead paint and ammo I understand why they are banned but not lead ammo (yet). Not only would this be a loss of the right to buy/use lead ammo, but it would double the price of ammo that I and many other shooters use for recreational use.

I would just like to say that any affects on humans and wildlife do not outright justify this recommended ban.

On page 235, Recommendation 9 of the CAP it clearly says "reduction of lead shot." This is clearly a wolf in sheep's skin which pretty much means a "reduction" of lead will ultimately lead to an outright ban.

In conclusion, I oppose a ban on the sale and use of lead ammunition and urge the Department of Ecology to drop this proposal.

Thank you for reading this.

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From: Gary
Sent: Monday, October 06, 2008 8:04:01 PM
To: Davies, Holly (ECY)
Subject:

I am opposed to any additional bans on lead ammunition other than the present wet area bans. There simply are no other alternatives to lead bullets.

From: gmiklos@netscape.com

Sent: Monday, September 29, 2008 11:02:55 PM

To: Davies, Holly (ECY)

Subject: Lead???

Your office is trying to get ridd off lead bullets &shot ???
99% of bullets & shot are shot at a range or a trap club.
1% for hunting, so this is killing the state ecology naming what??
There is still lead paint sold in the state of wa, how come!!!
I think if lead bullets &shot are banned all lead should be
Heres the crank to start to the car.
Or maybe you might think about lead on your walk to work????
This lead banned means Electronics Too!!!
have a good day with out lead!!

email gmiklos@netscape.com

hunter for 60 years!!!

Netscape. Just the Net You Need.

From: Gordon

Sent: Friday, September 19, 2008 10:50:54 AM

To: Davies, Holly (ECY)

Subject: Lead Chemical Action Plan;

This is one of the worst ideas I have ever heard of for the state as it would stop one of the best recreational sports in this state.. Until there is a reasonable substitute freely available , there should be no such plan even thought of and I would like the Governor to veto any such plan. Thank you for letting the Governor know my feelings on this very touchy issue.

I am using the free version of SPAMfighter for home users.

SPAMfighter has removed 56 spam emails to date.

Paying users do not have this message in their emails.

Try [SPAMfighter](#) for free now!

From: guns equal freedom
Sent: Thursday, September 18, 2008 10:56:39 AM
To: Davies, Holly (ECY)
CC: guns_equal_freedom@yahoo.com
Subject: Banning lead ammunition

Eat shit you fucking liberal moonbat eco-nazi earth-first type.

Fucking ban dirt bikes from PUBLIC land, now you want to ban lead ammunition from PUBLIC land.

Fucking democrat jack booted thug, you didn't even have anyone from the firearms side there.

You suck.

From: gvaar@aol.com
Sent: Friday, October 03, 2008 10:58:49 AM
To: Davies, Holly (ECY)
Subject: lead bullets

who is it that thinks that there is such a thing as green bullets instead of lead bullets for hunting purposes. We have already taken lead shot out for bird hunting and instead we have gone to steel shot.

I will be keeping track of the people that are for banning lead for hunting and fishing and I will make a point watching who I vote for in upcoming elections in the years to follow. I do not infringe on your activities so please do not infringe on yours

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From: hydrogeneconomy@mail.com
Sent: Thursday, September 18, 2008 5:35:38 AM
To: Davies, Holly (ECY)
Subject: cap

that's awesome: you're in lacey, right across from the new Cabelas and you want to ban the only viable ammo since the 1700s with a back door attack on the second amendment.. If you are going to destroy something legally, shouldn't you be required to have a remedy for the damage you'll cause????????????????

Doing this in Gregoires dying days is diabolical. None of the right people will go to your Seattle "public" meeting on it, and you are fully aware of such. I'll go out of state and buy tens of thousand\$ of cheap lead ammo and bring it back to sell and believe me, people are gonna be desperate in this economy. How will you afford the lawyers you'll need to fight the states (and their businesses) that haven't banned lead ammunition?

--

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Choose From 200+ Email Addresses
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From: Jason The Saj
Sent: Thursday, September 18, 2008 11:45:46 PM
To: Davies, Holly (ECY)
Subject: Regarding the "Lead Chemical Action Plan"

Can I offer some alternative suggestions?

First off, while non-lead based ammo does exist for some calibers, it is extremely hard to find and usually several times more expensive. Second, there are a number of calibers that I've not found any non-lead alternative. One of which happens to be the extremely common 22 caliber. This round is probably the most popular in America. It's the round most people learn to shoot. It's what I shot in Boy Scouts.

To pass such legislation is foolish, and essentially using environmental concerns as gun control. All this will do is cause a backlash against environmental concerns. Which would be a shame...

Can I suggest an alternative. How about offering a tax free season on all non-lead based ammo. There are a couple of ways this can be done. But the simplest in my opinion would be to eliminate the sales tax on non-lead ammo for a period of 5 yrs. Perhaps also offer dealers, and sporting goods stores, a tax incentive if they stock and carry non-lead ammo for most common calibers.

The result, this would help lower the price on non-lead ammo, which would increase the quantity sold, ramping up production and lowering the manufacturing costs. This will help transition the change.

If you really need more, than consider a \$1 per box of ammo tax for lead bullets. And then apply a further discount incentive on non-lead ammo.

This would be a much better strategy...and truly help achieve the goal of improving the environment (rather than simply passing gun control legislation under another name).

From: Jgdurkee@aol.com
Sent: Monday, September 29, 2008 10:44:04 AM
To: Davies, Holly (ECY)
CC: Jgdurkee@aol.com
Subject: Draft Lead Cap

Holly,

I do not desire any additional restrictions on the use of lead ammunition or lead fishing shot. I believe that existing laws are sufficient to protect the environment. No new laws or restrictions are needed. I am afraid that anti-gun groups will try to whip public opinion into a frenzy about "potential harm" that ill advised legislation will result that further restricts the use of lead ammunition for hunting or target practice. Chicken Little Syndrome will take over and unneeded restrictions will be put in place.

I would also like to review a paper copy of your draft CAP and the scientific basis for any findings or recommendations that the Department of Ecology is making in this document.

Thank you.

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From: Jim

Sent: Sunday, September 21, 2008 11:21:58 PM

To: Davies, Holly (ECY)

Subject: LEAD EXPOSURE

Worry about ammunition lead exposure where in the city, country oh yea how about Irac. what about exposure to traffic, nuclear, propane, household (paint ,insectasides spray yada yada yada ect) oh and natural gas that we turn loose commonly know as the FART. Quit wasting the tax PAYERS MONEY!

What happened using good old common sence.

From: jmreik

Sent: Sunday, September 21, 2008 12:49:46 AM

To: Davies, Holly (ECY)

Subject:

Bad idea. Sounds like back door gun control to me. You can't ban the guns so you try to ban the ammunition.

John in Oklahoma

From: Joey C.

Sent: Sunday, September 28, 2008 12:54:08 PM

To: Davies, Holly (ECY)

Subject: Lead ammunition ban

Let's be clear about what you are up to. You want to ban guns. First you'll try to ban ammunition. But as a first step you'll try to ban lead ammunition. Since there is no viable substitute for lead ammunition the attempted ban on lead ammunition is the initial phase of wanting to vacate the Second Amendment. What makes you think you are wiser than the Founders of the USA? Answer: You are not. You are driven by left-wing mantras to disarm the USA. You will never, ever accomplish that goal.

From: marty marty
Sent: Saturday, September 27, 2008 8:21:52 AM
To: Davies, Holly (ECY)
Subject: Lead CAP

To whom it may concern

I feel your use of a quarry as an example of lead toxicity points more to a problem with the range than with the projectiles in use.

The current range I frequent in Clark county has "soft" sand/earth banks to capture lead and copper clad projectiles en-tact.

A possible idea you may wish to put on your agenda is to update all government operated ranges to sand bank capture.

This way the sand can be sifted yearly and the bullets recycling.

As I'm not a hunter I can only pass on some additional thoughts concerning my hobby of target shooting.

Many (as in most) of the cowboy action and Quigley matches have long standing multi-state records requiring the use of period guns and bullets (lead) in all matches.

Olympic small bore competition also uses lead based ammo.

Obviously these are only two of many examples but I think it makes a point that on shooting ranges nation wide lead based ammo currently has no replacement and more of your emphasis should be towards soft capture of the current projectiles in use.

In the uncontrolled environment of hunting I can easily see the point to removing lead shot from the environment as foul could easily mistake lead shot for small pebbles to aide digestion.

Though I truly feel the prospect of hunting projectiles (bullets not shotgun shot) to make the environment toxic is vastly overstated. As most modern lead and copper projectiles are now designed to retain 80% or more of their mass.

What this means is that any projectile that misses its target is going to be safely burried underground untill the next ice age, and projectiles that do hit would be too large to be easily consumed by most small carnivores.

If a carnivore were to eat a rifle projectile I do believe it would follow the same rout as bones and would quickly exit the creature via the end rout, leaving very little time for exposure.

So in other words focus on getting state wide ranges up to date and don't spend too many sleepless nights worrying about lost rifle bullets.

Marty

From: Paul's Machine & Engine Rebuilding Service

Sent: Friday, September 19, 2008 9:18:35 AM

To: Davies, Holly (ECY)

Subject: lead

this is a waste of tax payers money. get some commun sence for a change and us are tax dollars for some thing more consrutive for a change . i vote nra and will not agree with trying to ban ammunition . lead shot and water foul is correct but bullets (this is plain stupid) ---are going to ban cars and exctra as they cause a lot of deaths--animals and humins ... we need a eatern washington and get ride of a bunch of west coast dumacrats..

From: Phil Jarmer

Sent: Wednesday, October 01, 2008 7:51:23 AM

To: Davies, Holly (ECY)

Subject: lead bullet ban

This idea is a waste of time there is no proof of what is claimed about lead fragments in game and down the food chain accusations. I am 68 years old and have fed my family a lot of deer and elk as well as bear that have been harvested with a lead projectile with no ill effects. I believe this to be an anti hunting anti gun idea and should not even have time wasted on it. I guess I can't expect much thinking in a state run by a two out of three loser.

From: rb

Sent: Thursday, October 02, 2008 2:48:57 AM

To: Davies, Holly (ECY)

Subject: lcap

Regarding the Lead Chemical Action Plan,

I'm not sure you have any accurate data on harm done by lead shot in regards to upland bird hunting.

Certainly there must be bigger ecology concerns.

People dumping refrigerators, motor oil, tires and the like.

I'm quite sure that all the hunters I know love the outdoors and take better care of it than any one else, and would never consider pollution by the above mentioned means.

From: rcpljp@aol.com

Sent: Saturday, October 04, 2008 1:25:06 AM

To: Davies, Holly (ECY)

Subject: lead ban

Dear Holly Davies,

My name is Robert Pierce. I live in Pasco, WA. I have heard of the initiative to ban lead in fishing weights, shotgun ammunition and wheel weights. My family and friends are avid upland bird hunters, sports clay-pigeon shooters and fishermen. I strongly oppose the banning of lead in ammunition and fishing weights in WA State. Please reconsider this initiative. These sports would ultimately suffer greatly in the future if this ban was imposed.

Thank you,
Robert

McCain or Obama? Stay updated on coverage of the Presidential race while you browse - [Download Now!](#)

From: RG

Sent: Monday, September 22, 2008 3:37:26 AM

To: Davies, Holly (ECY)

Subject: Lead ammunition (and other) Lead bans;

Ms. Davies and DoE,

I have watched the drum beat for banning of the use of many substances in this, and other states now for better than 3 decades. The departments contention that banning of Lead in small arms ammunition use is at best, ambitious in it's scope. Am I to believe that the relatively small statistical amount of Lead used in this application the department finds significant?

Every vehicle has Lead mounted on all 2, 4, 6, or 18+ of it's wheels, to balance tires. Each vehicle has a lead/acid battery with which it's starter motor operates. Most battery powered electronics utilize it as well. Even Hybrid powered cars use some amount of the substance in their batteries. No ma'am, the amount of it used in ammunition is small enough, to be statistically non-existent.

The department should know, that when used at indoor ranges, the Lead gathered by the deflecting equipment, actually is RECYCLED to once again become ammunition. As also is by the way, some sources of Lead mentioned above.

Unless the department is going to suggest alternate methods of balancing vehicle wheels. Or is prepared to mandate that every new automobile produced come equipped with a hand crank for use as an engine starter, I fear this piece of legislation is an exercise in futility. In particular, it's small arms Lead ban aspect.

It is however more widely being seen as an attempt at back door gun control (via ammunition). And is being viewed as such, not only here in Washington state, but elsewhere currently.

I thank you for your time

From: Rob Skeens
Sent: Friday, September 26, 2008 3:22:08 AM
To: Davies, Holly (ECY)
Subject: Lead ban

This lead ban is wrong. The facts in the study are not accurate and this is not something that you should pursue.

From: sidewinderwa@pocketinet.com
Sent: Saturday, September 20, 2008 1:08:03 PM
To: Davies, Holly (ECY)
Subject: Lead free ammunition

I work at a major sporting goods store and know that there are only a few non-lead bullets available. I have not seen any evidence that a requirement to only shoot non-lead bullets is justified. How many actual cases of lead poisoning are from lead bullets? I can understand indoor shooting ranges using non-lead bullets so that the vapors are not ingested while breathing. I see no justification in the hunting world for small and big game hunting. This would greatly influence the shooting world, hunting and those people that make money from hunters and shooters, including motels, restaurants, grocery stores, sporting goods stores, etc. Please do not go overboard on this issue and leave it a voluntary issue and not a mandatory issue. We are NOT Kalifornia!

From: Ted S.

Sent: Sunday, September 28, 2008 2:22:38 PM

To: Davies, Holly (ECY)

Subject:

Are you kidding me?

I just want to know what we are thinking these days that we have nothing better to do than right laws that do nothing for the environment. Banning lead bullets has to be near the top of the list of the stupidest things i've ever heard. You had better ban lead fishing weights first.....!!!!!! tree hugging fools. Of course I'll be sending emails to all my elected officials.

From: Vance234@aol.com
Sent: Thursday, September 18, 2008 5:08:46 AM
To: Davies, Holly (ECY)
Subject: Lead

You got to be kidding. The amount of lead we are talking about is so small that if it were not associated with guns would not be mentioned. I who live in Olympia believe most shooters in this area shoot at ranges. The indoor range I shoot at recycles the lead.

Psssst...Have you heard the news? [There's a new fashion blog, plus the latest fall trends and hair styles at StyleList.com.](#)

From: Wadogcatcher@aol.com
Sent: Saturday, September 27, 2008 11:10:32 PM
To: Davies, Holly (ECY)
Subject: CAP - Lead Ammunition

I see this plan (CAP) to ban lead ammunition as another opportunity for the anti-hunting, and anti-firearms establishment to take away our second amendment rights!

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From: Zurfs
Sent: Wednesday, September 03, 2008 2:01:22 PM
To: Davies, Holly (ECY)
Subject: Lead Caps

Congratulations,

You "agenda" oriented, self proclaimed lawmakers, could not get this passed through the legislature, so make up some doom and gloom and scare everyone into believing there is some science behind your decisions and not the forwarding of your socialist goals.