

WHATCOM COUNTY
Parks & Recreation
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PUBLIC INFORMATION NOTICE

Whatcom County enters into Expedited Settlement Agreement with the Washington Department of Ecology related to lead impacts at Plantation Rifle Range

High-power range will be closed starting November 1, 2022 as Whatcom County Parks implements agreed actions to resolve environmental issues.

SUMMARY

- A large number of lead bullets have been discharged at the rifle range in the 50 years since it began operations. These lead bullets and fragments are embedded in the berms which serve as backstops at the range. The accumulation of lead, a potential environmental health hazard, has become a cause of concern for Whatcom County and State agencies.
- Recent testing confirmed a high concentration of lead in the soil.
- Additionally, surface water tests downstream of the range indicated a concentration of lead that marginally exceeded Clean Water Act standards for aquatic life in freshwater systems. At the same time, the detected level of lead has remained well below the regulatory benchmarks for drinking water.
- In order to address this legacy issue of lead contamination, Whatcom County has entered into an agreement with the Washington Department of Ecology to remove contaminated soil and take proactive steps to prevent future impacts on water quality. Whatcom County has already begun to take the first steps toward implementation of the site clean-up plan.
- Clean-up efforts will impact operations, and the high-power rifle range will be closed starting November 1. The County will engage with stakeholders over the long-term future of the range and analyze the costs and benefits associated with continuing operations under stricter regulations.
- While no tests conducted to date have shown lead levels in water approaching a concentration that would present a human health hazard, we know this may be a concerning topic. We take these issues - and our community's health - very seriously. We are committed to the health of our environment and our community. If you have questions about lead in your drinking water, please refer to the [Whatcom County Health Department's informational webpage on lead](#).

RANGE HISTORY AND OPERATION

- The Plantation Rifle Range opened in 1971. It began with a 300-yard large-bore rifle range (also called the high-power range) and a trap range. In the mid-1970s, the indoor and outdoor small-bore ranges were added. It is one of only two public gun ranges in the state of Washington.
- The range sits on lands leased by Whatcom County from a private company, Bertch Timberlands, LLC. The property was historically used as a tree plantation, which is how the site got its name.
- Whatcom County Parks and Recreation (Parks) operates the range. Users include members of the general public and law enforcement agencies from across the North Puget Sound region.
- In 2019, the last full pre-pandemic year of operations, the Plantation Range hosted more than 13,000 recreational shooters and more than 150 visits by law enforcement training groups. Revenues generated by user fees totaled \$245,917, which covered approximately 85% of the costs of operating the facility.
- The indoor small-bore range is currently closed while its HVAC system is being replaced, with reopening planned by the end of 2022. The adjacent outdoor small-bore range is also now closed due to unresolved concerns about proximity to recently-built houses.
- The high-power range is open but at a reduced capacity to minimize environmental impact.

PENDING ENVIRONMENTAL ISSUES

- Plantation Range is transected by an unnamed, salmon-bearing stream that is part of the Lake Samish watershed. The stream flows onto the property from the north toward the high-power range, through a culvert under a berm, then across the northeast corner of the property before exiting the property to flow adjacent to the range and south toward Lake Samish.
- There are also wetlands on the eastern edge of the high-power range.
- Other than recent work to remove surface materials, no lead has been removed at the range since it began operating in 1971.
- The layout of the range has allowed lead bullets to fall in close proximity to the stream (both outside the 300-yard berm to the north and within the range). These objects have fallen into the wetland within the range.
- Lead is a pollutant that presents a health hazard to humans when exposure reaches certain thresholds. It can also have negative impacts on animals.
- The high-power range was visited by the Washington Department of Ecology (Ecology) in January 2020. They took surface water samples downstream of the range. The results showed lead above Clean Water Act standards for aquatic life in freshwater systems. On April 29th, 2021, Ecology staff took soil samples along the high-power range. The results showed that two of six samples had lead above a level that would require regulation as a “dangerous waste.” The limit for lead is 5 mg/L; two samples were 850 mg/L and 920 mg/L.
- From late 2020 through 2022, Parks took water quality samples both upstream and downstream of the range. The results of these samples do not indicate levels of lead, from a drinking water perspective, at levels requiring action.¹
- In May 2020, as a result of these inspections, Parks was notified of violations that put it in non-compliance with Dangerous Waste regulations and Washington’s Water Pollution Control Act. Ecology directed Parks to take steps to return to compliance.

- In March 2022, Whatcom County and the Ecology agreed to enter into an Expedited Settlement Agreement (ESA) to resolve these violations.
- In September 2022, Whatcom County and Ecology finalized the ESA. The ESA requires Parks to take specific steps within 120 days. These steps include: continuing water quality sampling; preventing erosion and the movement of lead from the site; removing target waste, bullets, and other visible non-native debris from the surface of the range; and submitting of a report showing compliance.
- Also, the County and Ecology have agreed to finalize an Agreed Order which will result in clean-up of both the high-power and small-bore ranges.

NEXT STEPS

- Parks has begun to implement the ESA.
- Parks will hold a public meeting, details to be determined, to share about the current range status and the ESA. This will be an opportunity to respond to questions and concerns from users and the public. Notice of this meeting will be posted separately.
- In December, Parks will submit a report to the Ecology explaining how it complied with ESA requirements. The report will address water quality sampling and monitoring. It will address removal of debris that is visible on the ground at the range. It will also address the steps Parks has taken to prevent more lead debris on top of the range and within nearby waters.
- In January 2023, Parks will submit a plan to the Ecology. The plan will show how Parks will identify lead impacts to human health in drinking water downstream from the range.
- To facilitate site cleanup, Parks has made the decision to close the high-power range effective November 1st, 2022. It will remain closed until range cleanup is completed. Simultaneously, the County will gather additional information and public input to make future decisions about range operations.
- In March 2022, County Executive Sidhu wrote to Ecology and committed to negotiating an Agreed Order with Ecology. This Agreed Order will address site cleanup. The County hopes to have this Agreed Order in place by the end of 2022.
- The costs of these cleanup efforts have not yet been determined. Contracts to complete this work will be subject to review and approval by Whatcom County Council.

¹Washington State Department of Health, Lead in Drinking Water, website: [https://doh.wa.gov/community-and-environment/drinking-water/contaminants/lead#:~:text=The%20Washington%20State%20Department%20of,\(0.015%20parts%20per%20million\)](https://doh.wa.gov/community-and-environment/drinking-water/contaminants/lead#:~:text=The%20Washington%20State%20Department%20of,(0.015%20parts%20per%20million))

Drinking Water Regulations

The Washington State Department of Health requires public water systems to:

- Collect samples from residential customers.
- Treat the water when more than 10 percent of samples exceed the action level (0.015 parts per million).