

THE TRUTH ABOUT THE MOTHER LODGE GUN CLUB'S LEAD ISSUE

Rumors seem to abound and spread like a wildfire when things happen that members are opposed to or when members have a self-interest in one particular program at the "Club". The Mother Lode Gun Club is and should always be the priority over any member or any program. Members have a place to shoot and the programs exist because of the "Club". If the Mother Lode Gun Club closes its doors because the lead issue is not handled properly then the members lose their "Club" and all of the programs stop. The Mother Lode Gun Club is the only thing that counts at this point.

The following information will clear up any misconceptions and lay out the true situation concerning the lead issue. The following discussion is based on the truth, not rumors, exaggerations, misconceptions, and in some cases lies:

- 1.** Barry Blaylock and I attended the NRA Grant Meeting in Sacramento in February of 2017. One of the grants involved a northern California club with a lead problem (To be referred to as Club X)¹. Club X was remarkably similar to our "Club" in many ways.
- 2.** I reported on the lead issues faced by Club X at the next board meeting of the Mother Lode Gun Club. President Popke appointed me as the chairman of the Lead Committee for the "Club".
- 3.** I contacted representatives from Club X and acquired the name of the firm handling their lead problem. The current President and past President of Club X were extremely cooperative and helpful.
- 4.** I acquired such documents as the EPA's "Best Management Practices for Lead at Outdoor Shooting Ranges", "Lead Management & OSHA Compliance For Indoor Shooting Ranges" as well as other information concerning lead.
- 5.** I then prepared a report for the Board of Directors explaining the various issues that needed to be addressed. The plan

¹ NRA Grant Committee rules preclude me from including the name of this club. Therefore the name Club X for greater ease in the presentation.

prioritized the various ranges at the “Club” with the indoor range as number one, the trap range as two, next the gong, and then the rest of the outdoor ranges (Action Pistol, 100 yard, 200 yard 25 yard, and 50 yard).

- 6.** The next item was to have the meeting room, kitchen, and indoor range checked for lead contamination. Two bids were received. One was for approximately \$5,000 and the other was approximately \$1,700. Entek, the low bidder, was given the bid and conducted the test.
- 7.** Entek conducted a sampling of the indoor range, adjoining meeting room, and kitchen for lead. The results came back extremely high with the kitchen having approximately 3,000 ug per square foot, the meeting room approximately 8,500 ug per square foot, and near the firing line the indoor range 9,400 ug per square foot². A recommended safe level is 40 ug per square foot.
- 8.** The next step was to determine what was necessary concerning a cleanup of these areas. JM Environmental, Inc. was contacted and the owner, John Moore, met with Dick Coffin, Jim Collins (member of Lead Committee), and me to discuss the lead issue and provide a bid for cleaning up the indoor range, meeting room, and kitchen (the Building). John Moore’s recommendation was to not pay for a cleanup. He said that we were a gun club and six months after paying for the cleanup we would have a lead dust problem again. His recommendation was to have our attorney prepare a waiver for all club members and all guests to sign prior to entering club property. One of the representatives from Club X said that they did not even have an indoor range but they had lead contamination in their kitchen. Shooting ranges generate lead dust.
- 9.** JM’s bid for the cleanup was:
 - a.** Bullet Trap: \$15,000
 - b.** Indoor Range: \$33,000
 - c.** All Purpose Room: \$27,000
 - d.** Swamp Coolers: \$3,800
 - e.** Other Work: \$24,000

² Ug per square foot is micrograms per square foot.

- 10.** President Popke, Dick, and I met with Paul Bunt (the “Club’s attorney) to discuss a waiver and how to handle the lead issues concerning the Building. Paul told us that a waiver would not work for a minor. It would only work for adults. He recommended that all persons under eighteen be banned from the indoor range.
- 11.** Status of the indoor range was then discussed by the board:
- a. Approve or reject JM’s proposal to clean up the Building.
 - b. If we do the cleanup, are we going to spend the money to modernize the indoor range? This could cost the Club approximately \$150,000 to \$200,000 depending on what we decide to do. A firm had been contacted earlier concerning modernizing the indoor range. If we paid to do the work on the indoor range to mitigate lead dust, do the cleanup, and put on a new roof we would need to modernize our equipment. A firm I contacted in Nevada would provide a new bullet trap, exhaust fans with the required HEPA filters, target retrieval equipment, and a louvered ceiling. The range would be redesigned to mitigate lead dust and exposure to it. The total for all of this work could even reach \$250,000.
- 12.** The indoor range was put on hold as a result of a letter received by President Popke on June 22, 2017. Guy Chetelat of the Central Valley Regional Water Quality Control Board expressed concern about the trap range and its proximity to the seasonal creek running through “Club” property. Lead samples were taken fifteen feet upstream from Jamestown Road and elevated lead levels were found. The letter, at this time, is requesting that we assess erosion at the shooting range and develop a plan to control erosion and associated potential discharges of lead in storm-water runoff.³
- 13.** President Popke instructed me to contract with a firm to test all of the outdoor ranges for lead and develop a plan, as requested by Mr. Chetelat. If the “Club” fails to do this, there is a good chance that we will lose the “Club” in a few years. Therefore, there is no point in spending money on the indoor

³ Angels Cam Gun Club also received a letter from Mr. Chetelat.

range. If the “Club” does not cooperate with the Water Board we will be closed, everything is then lost. Since we are now under the scrutiny of the Water Board, we must consider the outdoor ranges our first priority.

- 14.** The firm selected to test the outdoor ranges and develop a plan was Holdrege & Kull from Nevada City. On October 5, 2017, the “Club” was closed and test samples were taken. At this time a drone was flown over the “Club” in order to map it to assist with developing a plan to handle our storm water.
- 15.** The Board is considering retaining an attorney who specializes in gun clubs and their lead issues. Several gun clubs in our area with lead issues, including Angels, have either engaged or are considering engaging this attorney.
- 16.** President Popke, Dick Coffin, Jim Collins, Paul Bunt, and I met with W. Lee Smith an attorney with Michel & Associates. Mr. Smith represents gun clubs like ours with lead issues. He also works with Guy Chetelat and various regional water boards. He is also closely connected to NRA and other issues involving gun clubs such as firearms. Mr. Smith brought Dwight Hoenig with him from Turner Maclane, Inc. an environmental consulting firm. We all walked the entire range, including the indoor range, and here are some of the things that we learned:
 - a. President Popke made the correct decision closing the indoor range.
 - b. Mr. Smith and Mr. Hoenig think that 40 ug per square foot is unreasonable and the 200 ug per square foot is a better goal when dealing with the indoor range.
 - c. Trap one and possibly trap two will have to close until they can be redirected.
 - d. The gong is a major problem and as such will be taken out.
 - e. Work is needed on the 25 and 50 yard ranges to contain storm water and runoff.
 - f. Work is required on the shot fall area at trap to mitigate lead and runoff during storms.
 - g. If we do not work with the Water Board, the “Club” will be designated as a problem and enter into a designation we

- will never get out of. As such, we will come under the scrutiny of approximately six different agencies.
- h. We need to establish a closure fund if things become so expensive that we have to close the “Club” and turn it over to the State. Mr. Smith said that the State would rather we stay open and follow a plan to mitigate the lead issues rather than having the State take over and force the tax-payers to pay for the cleanup.
 - i. Mr. Smith gave a San Francisco gun club as an example what happens when the rules are ignored. He said that the gun club’s board was trying to comply with the various issues concerning lead. A group of members decided that they would take over and ignore the directives concerning lead. Mr. Smith said that the club is now “toast”.
 - j. We were told that we have to formulate a plan and record each year what we do to mitigate lead leaving our range. If we do that, we have a chance to stay open.

Now you all know the truth concerning the closure of the indoor range, the other issues concerning lead, and the danger your “Club” is in. Your officers and board would like to know what you want to do. Here are some possibilities that the Board is suggesting:

1. Executive order from President Popke using his authority to deal with safety issues; reduce the number of guests to two (2). Our “Club” is in danger because of too much lead. At this time, an overabundance of guests contributes too much lead to our ranges and these guests do not pay anything to help with the problem.
2. Once the report arrives from Holdrege & Kull and the Board has an approximation of what costs we are facing, there could be a notification sent out to you calling for a vote on a special assessment for 2018 to pay for our lead abatement program. We are having a budget session to develop the 2018 budget the last Saturday in October. If possible, we will try to include a special assessment, if needed, with the vote on the 2018 budget. The “Club” has a problem with lead and it must be handled properly. That is going to be expensive and all club members, regular and life members, will have to contribute to the lead abatement program

through a special assessment each year.⁴ It could go on for several years, even more if the membership decides to include the indoor range in this process. A special assessment is not a pleasant thing to consider but neither is the alternative, losing the Mother Lode Gun Club.

Once again, if any of you have any solutions for our lead problem or would like to step forward and assist, we welcome you. However, we are now dealing with the government and, like taxes, complaining will not make it go away.

Thank you,

Fred Coleman
Chairman Lead Committee
Mother Lode Gun Club

⁴ A special assessment will have to be voted on at a regular meeting of the membership just like dues increases and yearly budgets. The membership will decide if they want a special assessment or not. The Board can only recommend. Control of this issue is in the hands of the members.