

Plantation Range

- Comprehensive Memo
- Complete picture outdoor range remediation
- Complete picture indoor range
- Moving forward
- Property ownership, operational model
- Council considerations

Plantation Rifle Range:

Education, Safety, Practice and Training



Range Services

- Outdoor High-Power and Trap Range
 - 15 covered firing points with distances to 300 yards
 - Trap field with automatic trap machine
- Outdoor Small-Bore Range
 - 12 covered firing points with a maximum distance of 100 yards
- Indoor Range
 - 12 firing points with electric target carries
 - Education and training space
- Contracted Services
 - Law Enforcement Use
 - Academy Use



Issues

- Range has been in operation since 1971
- Though lead is routinely reclaimed and recycled at the Indoor Range, lead shot has not been reclaimed at the outdoor ranges since opening
- Lead shot, when collected and recycled is not considered a Dangerous Waste
- Lead shot when left to accumulate in the environment may be considered a Dangerous Waste
- Washington State Department of Ecology has identified accumulated lead shot at Plantation Rifle Range as a Dangerous Waste
- Whatcom County identified as Potentially Liable Person

An Agreed Order is a legally binding administrative order issued by Ecology and agreed to by the potentially liable person.

It describes the site activities that must occur for Ecology to agree NOT to take enforcement action for that phase of work.

Agreed Order
No. DE 21650:
May 2023

Washington's Cleanup Process

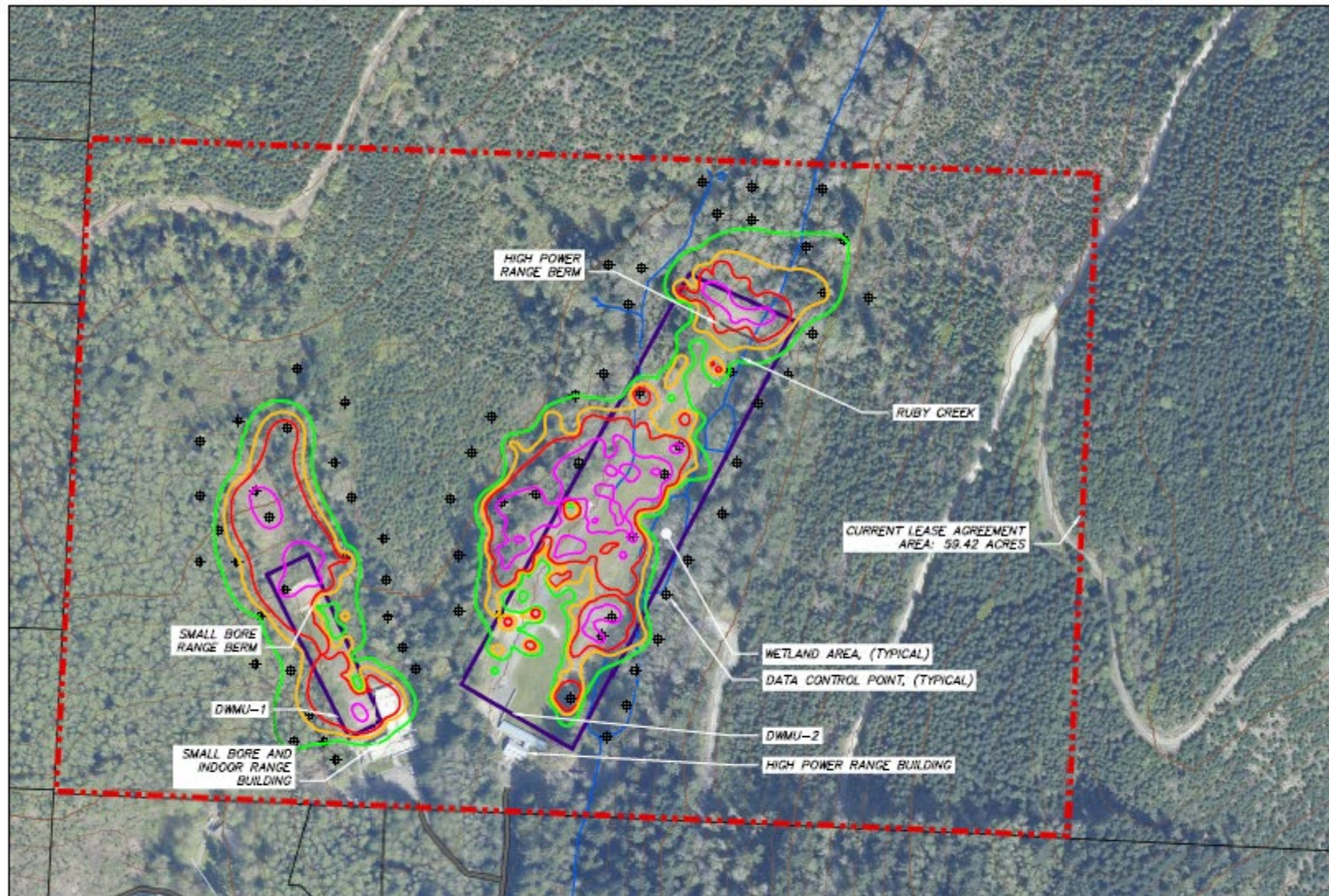
Public participation plans and comment periods are only required for cleanups under a legal agreement with Ecology. Otherwise, all cleanups follow the same steps. The steps are defined by Washington's cleanup law, the Model Toxics Control Act.



January 2024 | publication 19-09-166

Public Participation:

- Public review and comment
 - Remedial Investigation Report
 - Feasibility Study
 - Clean-Up Action Plan
 - Engineers Design Report
 - SEPA
- Periodic Community Engagement Meetings sponsored by Whatcom County



Context Location Plan

Map Legend

- Current Lease Agreement Area Boundary
- Dangerous Waste Management Unit (DWMU)
- Data Control Point
- Creek
- Wetland Area

Lead Concentrations in Surface Soil

- Extends unknown
- Greater than 212 mg/kg
- Greater than 500 mg/kg
- Greater than 1,000 mg/kg
- Greater than 10,000 mg/kg

Current Lease Agreement Area: 59.42 Acres
 Approximate Area for Control and Tenure of Site: 32.45 Acres

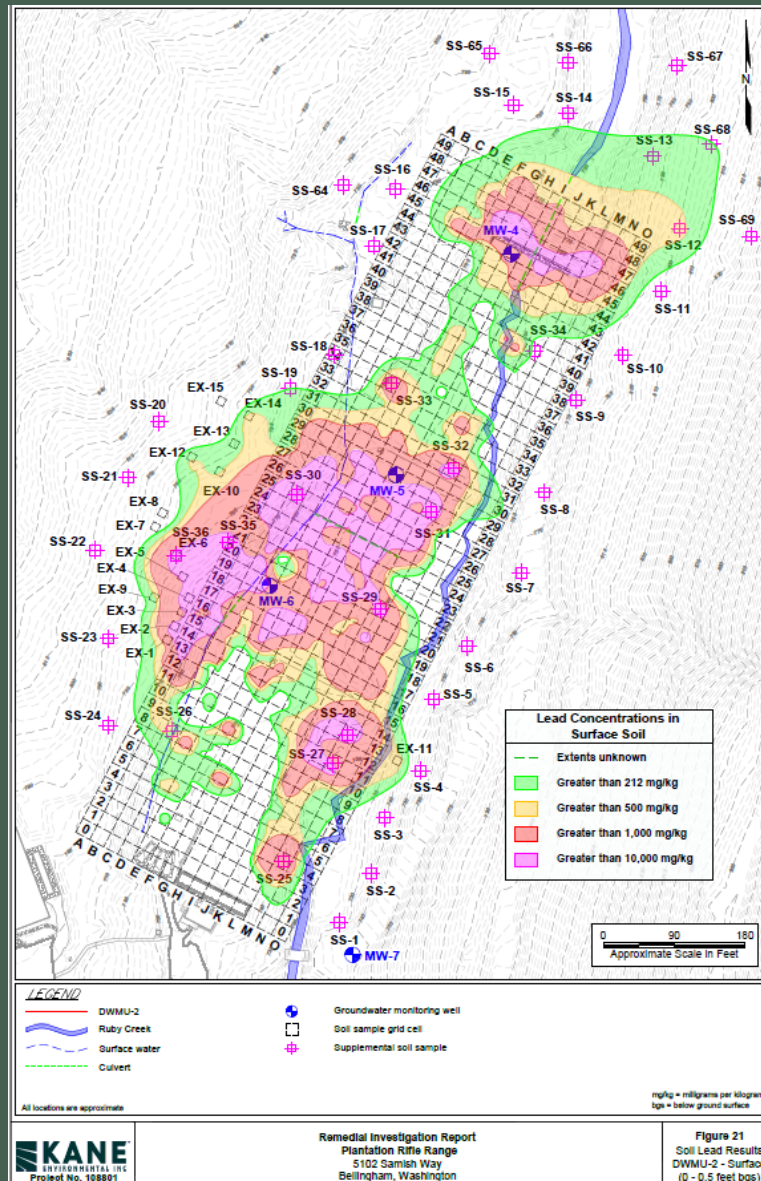
Scale: 0 125 250 Feet
 Approximate scale in Feet

The information included on this graphic representation has been compiled from a variety of sources and is subject to change without notice. While every effort is made to ensure accuracy, the information is provided as is and is not intended to be used as a basis for any legal action. The use or misuse of the information contained on this graphic representation is at the sole risk of the user.

Plantation Rifle Range
 Surface Soil Lead Contamination Diagram

Whatcom County Parks & Recreation





Contaminants of Potential Concerns (COPCs)

- Antimony
- **Arsenic**
- Chromium
- Copper
- **Lead***
- Mercury
- Nickel
- PAHs (Polycyclic Aromatic Hydrocarbons)
- Zinc

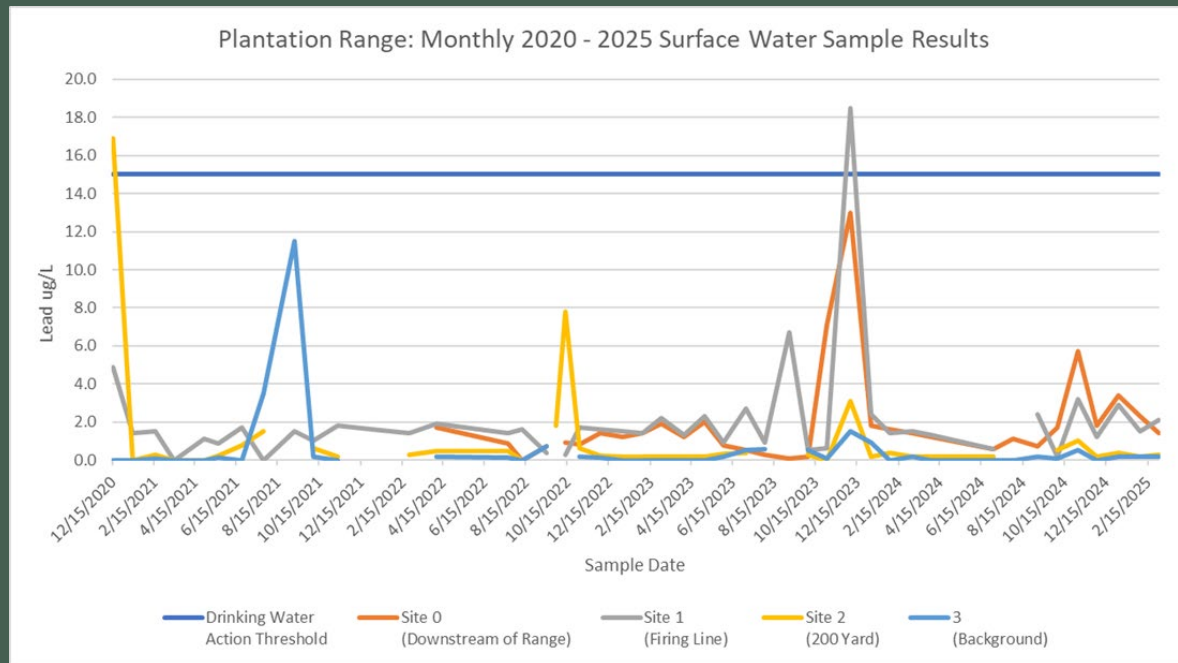
* Preliminary screening levels for Lead > 192x State Clean-Up Level (CLU) for soil

Summary of Activities

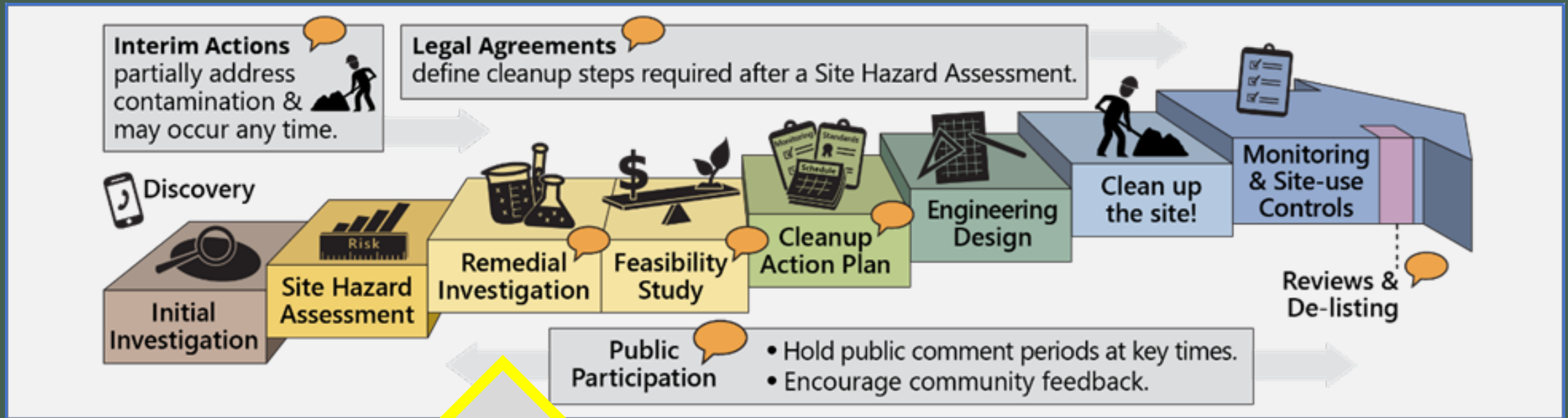
- 2022
 - Expedited Settlement Agreement
 - Addressed violations
- 2023
 - Agreed Order signed
 - Site Characterization started
- 2024
 - Site Characterization continues
 - Preliminary DRAFT Remedial Investigation (RI)
 - Preliminary DRAFT Terrestrial Ecological Evaluation (TEE)



Monthly Surface Water Sampling



- Ruby Creek Sampled Monthly
 - Dissolved Lead
 - Four instream sites
- Results are reported to DOE
- Drinking Water Standards
 - Two samples exceeded Action Threshold for drinking water purveyors



WE ARE HERE: Until Ecology is satisfied with the site assessment and remedial investigation (the final report documenting the type and extent of contamination), we cannot move forward to the next step of determining the amount of clean up that is feasible and acceptable to Ecology.

Plantation Rifle Range Environmental Remediation Project Budget Report

Account	Budget Authority*					Expenditures/Encumbrances					Remaining
	Original Budget	1st Budget Suppl	Budget Transfer	2nd Budget Suppl	Total Budget	2023 Actual	2024 Actual	2025 Actual (thru Feb)	Total Actual	Current Encumbered	Remaining Budget
Direct Billing	\$ 97,000		\$ (3,171)	\$ 70,000	\$ 163,829	\$ 4,368	\$ 792	\$ 1,612	\$ 6,772		\$ 157,057
Office Supplies			\$ 1,171		\$ 1,171	\$ 2,742	\$ 3,302		\$ 6,044		\$ (4,873)
Books, publications, & Subs					\$ -		\$ 321		\$ 321		\$ (321)
Contractual Services					\$ -		\$ 96	\$ 725	\$ 821		\$ (821)
Tools & Equip					\$ -	\$ 4,616			\$ 4,616		\$ (4,616)
Professional Svc		\$ 700,000	\$ 2,000	\$ 88,753	\$ 790,753	\$ 645,720	\$ 290,027		\$ 935,747	\$ 168,181	\$ (313,175)
Intergovernmental Prof Svc					\$ -		\$ 94,634	\$ -	\$ 94,634		\$ (94,634)
Other Improvements	\$ 558,000				\$ 558,000	\$ -			\$ -		\$ 558,000
Total	\$ 655,000	\$ 700,000	\$ -	\$ 158,753	\$ 1,513,753	\$ 657,446	\$ 389,172	\$ 2,337	\$ 1,048,955	\$ 168,181	\$ 296,617
Summary											
* Fund Sources									Total Budget Authority		\$ 1,513,753
REET I	\$ 1,035,971								Total Expenditures/Encumbrances		\$ 1,217,136
WA DOE Grant	\$ 477,782								Remaining Budget		\$ 296,617

Remediation costs to date

Total Budget Authority:

\$1,513,753

Expenditures and Encumbrances to date:

\$1,217,136

Remaining Budget:

\$296,617

Current estimated change orders: TBD

SOURCE OF FUNDING IS REET I

What work is occurring now?

- Ongoing meetings with Ecology Staff and Consultant
- Site Characterization continues
- Revising Preliminary DRAFT RI & TEE for submission to Ecology
- Preparing for next planning phases
 - Feasibility Study
 - Clean-up Action Plan
 - Engineering Design



What could clean up look like?



18,700 tons of soil removed, backfilled with new soil



Restoration of critical areas



Restoration of stream



Ongoing monitoring and compliance with Ecology



\$13.83 million. When plan is accepted by Ecology we must immediately begin clean up

How to pay for \$13.8 million in clean up costs?

Worst case, finance it – over 20 years – use REET for debt service \$1.1M a year for 20 years @ 6% interest

AND/OR... GRANT – work with Port of Bellingham for grant prep

Oversight Remedial Action Grants funded in 2023–25 Enacted Capital Budget

Click a CSID to visit the cleanup site webpage.

Show 50 entries

Search:

CSID 	Applicant	Project Title	Amount
63 	Port of Bellingham	Blaine Marina Tank Farm	\$300,000
219 	Port of Bellingham	Whatcom Waterway	\$17,700,000
220 	Port of Bellingham	Cornwall Avenue Landfill	\$2,420,000
1785 	Port of Bellingham	Weldcraft Steel & Marine	\$725,000
2012 	Port of Bellingham	I & J Waterway	\$1,955,000
2205	Port of Bellingham	Westman Marine	\$1,100,000
2279	Port of Bellingham	GP West (Chlor-Alkali RAU)	\$1,250,000
3418	Port of Bellingham	Central waterfront	\$2,650,000
10583	Port of Bellingham	Sea K Fish	\$770,000

Dept of Ecology Oversight Remedial Action GRANTS

May cover up to 50% of eligible costs

Competitive Grant Cycle every other biennium

Next Opportunity: January 2026 for 2027-2028 biennium

Dept of Ecology Oversight Remedial Action LOANS

Standard Loans: below market rate loan for up to 20 years.
Repayment up to 20 years with interest rate set at 60% of the average market rate

Extraordinary Financial Hardship Loans: below market rate loan with deferred terms and conditions for repayment.

We cannot legally stop funding this work. (Agreed Order financial assurance clause)

We must keep the process moving to be ready for the grant rounds. To do this, we must continue to fund this work locally.

Grant Funding not available until 2027.

After clean up: other considerations

- *Use of property will be determined by the extent of the clean up and conditions of Ecology*
- *After clean up plan is underway– discuss service structure, what outdoor range can be reopened if anything*

Q&A



Indoor
range

Current activities

- *Tiger Construction: Final hookups of HVAC units, insulation installation, egress door*
- *SAZAN Group: Commissioning of HVAC units – turned on by 3rd party and tested to ensure installation and operations are to plans*
- *County PDS: Final inspections*
- *Parks staff: Re-opening plan for September 2025*
 - *Staffing, pricing, hours of operation, anticipated revenues to sustain indoor range operations without reliance on general funds.*
- *Additional funds needed for project completion:*
 - *\$373,375*
 - *Construction completion*
 - *Commissioning*
 - *Direct Billing*
 - *Force Account*
 - *Contingency*
- *Source of funding for original budget: REET and RCO funds*
- *Procedures in place for lead – permit compliance with State Ecology. A 3rd party vendor handles this.*

HVAC and Roof Project Costs



- Expenditures and Encumbrances to date:
 - **\$1,310,205**
 - Tiger Construction, SAZAN Inc., Project Management
- Supplemental Budget Request:
 - **\$373,375**
 - Tiger Construction
 - Other Costs related to project closeout and reopening; Industrial hygienist, minor repairs, labor, etc.
- Total Project Cost:
 - **\$1,683,580**

Historical revenues generated

December	2024	Revenue						
		2018	2019	2020	2021	2022	2023	2024
Current Yr Refund of Expe	4369-9091	-	1,449.01	-	0.00	11.46	-	-
Misc Revenue-Tax Exempt	4369-9002	(15,963.80)	(10,410.80)	(10,330.10)	(10,209.44)	(3,169.00)	-	-
Overages & Shortages	4369-8100	(17.85)	(7.75)	(38.75)	(22.00)	(6.50)	-	-
Range Fee Tax Exempt	4347-6031	(9,166.75)	(11,969.16)	(9,166.75)	(8,606.75)	(7,980.65)	(196.00)	-
Range Fee-Contract No.	4347-6032	(93,949.79)	(89,008.32)	(88,469.92)	(68,580.97)	(41,231.89)	(116.41)	-
Rifle Range Fees	4347-6030	(140,833.67)	(135,970.54)	(87,449.85)	(62,504.93)	(49,341.70)	-	-
Total		\$ (259,931.86)	\$ (245,917.56)	\$ (195,455.37)	\$ (149,924.09)	\$ (101,718.28)	\$ (312.41)	\$ -

After clean up plan – Property lease

- Expires January 1, 2030
- Cost: \$4,000 per year
- Need to get to phase of clean up and ongoing encumbrances prior to any negotiation of purchase
- Complete final reports, SEPA
- Allowed use of property will be determined by the extent of the clean up and conditions of Ecology, and Whatcom County Code

After all the clean up.... Operational model

- Concessionaire
- Direct County operations

Q&A