



# Oregon

Kate Brown, Governor

Department of Environmental Quality

Western Region

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July 27, 2020

Kaylea Kathol  
City of Ashland Public Works  
51 Winburn Way  
Ashland OR 97520

RE: Cleanup Activities Complete  
Ashland Gun Club, 555 Emigrant Creek Rd, Ashland, Jackson County  
ECSI# 5384

Dear Ms. Kathol:

The Oregon Department of Environmental Quality (DEQ) has determined that the City of Ashland has completed the remedial actions for the Ashland Gun Club site in accordance with Remedial Action Plan (RAP), prepared by Stantec and dated October 15, 2015. DEQ has been working with the City since 2009 to assess and remediate past impacts from operation of the shooting range and to prevent future environmental impacts; and approved the RAP on November 19, 2015. The objective of the remedial activities described in the RAP was to minimize the potential for lead-contaminated soil to migrate beyond the limits of the active shooting range into nearby waterways, including Emigrant Creek. The Remedial Action Completion Report, Lithia Springs Property, dated May 2019 by Alpine Environmental Consultants, LLC (Alpine), documents the work that was completed as well the long-term monitoring that is still required to verify the wetland mitigation efforts are successful. This determination is based on DEQ's review of the Remedial Action Completion Report, regulations and the facts as we now understand them including, but not limited to the following:

- The Ashland Gun Club address is 555 Emigrant Creek Rd, Ashland, Jackson County, Map and Tax Lots 390112400 and 300207800 (Figure 1).
- Since 1968, the City of Ashland has leased approximately 32 acres to the Ashland Gun Club for use as an active shooting range (Figure 2). This use led to impacts to the soil and wetlands from the lead shot used at the range, and this contamination posed an unacceptable risk to Emigrant Creek.
- The area requiring remedial action was defined through numerous investigations, including a Level I and II Ecological Risk Assessment in 2009-2010, and a detailed site characterization in 2012 involving approximately 100 soil samples. The remedial action area included two wetlands, designated 3b and 5 (Figure 3).
- Contaminants of concern were lead, copper, antimony, and arsenic, which were found above the regional background concentrations.
- In August 2017, a total of 270 cubic yards of soil was removed from the remedial action area and 25 confirmation soil samples were collected post-excitation to verify the wetland area met background levels. After excavation, the area was backfilled with a drainage pipe; then covered by clean fill and hydroseeded to prevent erosion.

- The excavated soil was screened to remove the lead shot and then used to build up the actively used backstop berm located south of Wetland 5 (Figure 3). This reclamation is documented specifically in Appendix 1 of the Remedial Action Completion Report (Alpine, 2019).
- The loss of wetlands 3B and 5 to the remedial action was mitigated by creation of new wetlands on the west side of the gun club (Figure 3) in accordance with requirements of the U.S. Army Corps of Engineers (USACE), Oregon Department of State Lands, and DEQ's Water Quality 401 Program. The construction was completed between August and November 2018 following the Compensatory Wetland Mitigation Plan (CWMP) prepared by Stantec. Monitoring and maintenance of the mitigation effort is ongoing through at least 2023, until the mitigation efforts have been shown to be effective and satisfying the requirements in the CWMP.

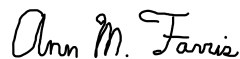
Based on the available information, DEQ has determined the cleanup requirements in the RAP for the Ashland Gun Club are complete. However, the site is still an operational shooting range that is known to have lead in the soil berms used to define and control the shooting areas. Also, the vegetation in the wetland mitigation area is still developing. Due to these conditions, the City of Ashland is completing the following actions to reduce impacts to human health and the environment in the future:

- Continued monitoring of the wetland mitigation effort for at least five years (through 2023) to guarantee survival of the new wetland habitat.
- Removal of the eight remaining piezometers at the site by October 2024 or within 90 days of receipt of final acceptance of mitigation wetlands by USACE, whichever occurs first.
- Ongoing compliance with best management practices for the active range, which are described in the Environmental Stewardship Plan (URS 2013).
- Maintenance of the City of Ashland zoning restrictions to control the land use.

If or when the shooting range closes, additional investigations and/or cleanup would be needed before the property can be transitioned safely to other uses. If any contaminated soil or groundwater is encountered in the future, it must be handled and disposed of in accordance with local, state and federal regulations.

A copy of the RAP and remedial action report can be viewed at <http://www.deq.state.or.us/lq/ecsi/ecsiquery.asp> (search for ESCI #5384). DEQ recommends keeping a copy of all of the documentation associated with this remedial action with the permanent facility records. If you have any questions, please contact Ann Farris at 541-687-7361 or [farris.ann@state.or.us](mailto:farris.ann@state.or.us).

Sincerely,



Ann Farris, Senior Project Manager  
Western Region Cleanup and Emergency Response

Attachments:

1. References
2. Figure 1 - Vicinity Map
3. Figure 2 - Site Map
4. Figure 3 – Remedial Action and Wetland Mitigation Area Map

cc: Jonathan Williams, Alpine Environmental

cc: ECSI #5384/COMM (including attachments)

**References:**

1. Brown and Caldwell, Level I Scoping Level Ecological Risk Assessment Report, Oregon, August 2009.
2. Brown and Caldwell, Level II Screening Level Ecological Risk Assessment Report, Oregon, April 16, 2010.
3. JBR Environmental Consultants, Inc, Site Characterization Report, Ashland Gun Club, March 9, 2012.
4. Alpine Environmental Consultants, LLC, Remedial Action Completion Report, Ashland Gun Club, May 17, 2019.
5. Stantec Consulting Services, Inc, Remedial Action Plan for the Lithia Springs Property, October 15, 2015.
6. Stantec Consulting Services, Inc, Compensatory Wetland Mitigation Plan for the Lithia Springs Property, March 17, 2016.
7. URS Corporation, Environmental Stewardship Plan, January 22, 2013.

**Figure 1: Vicinity Map**

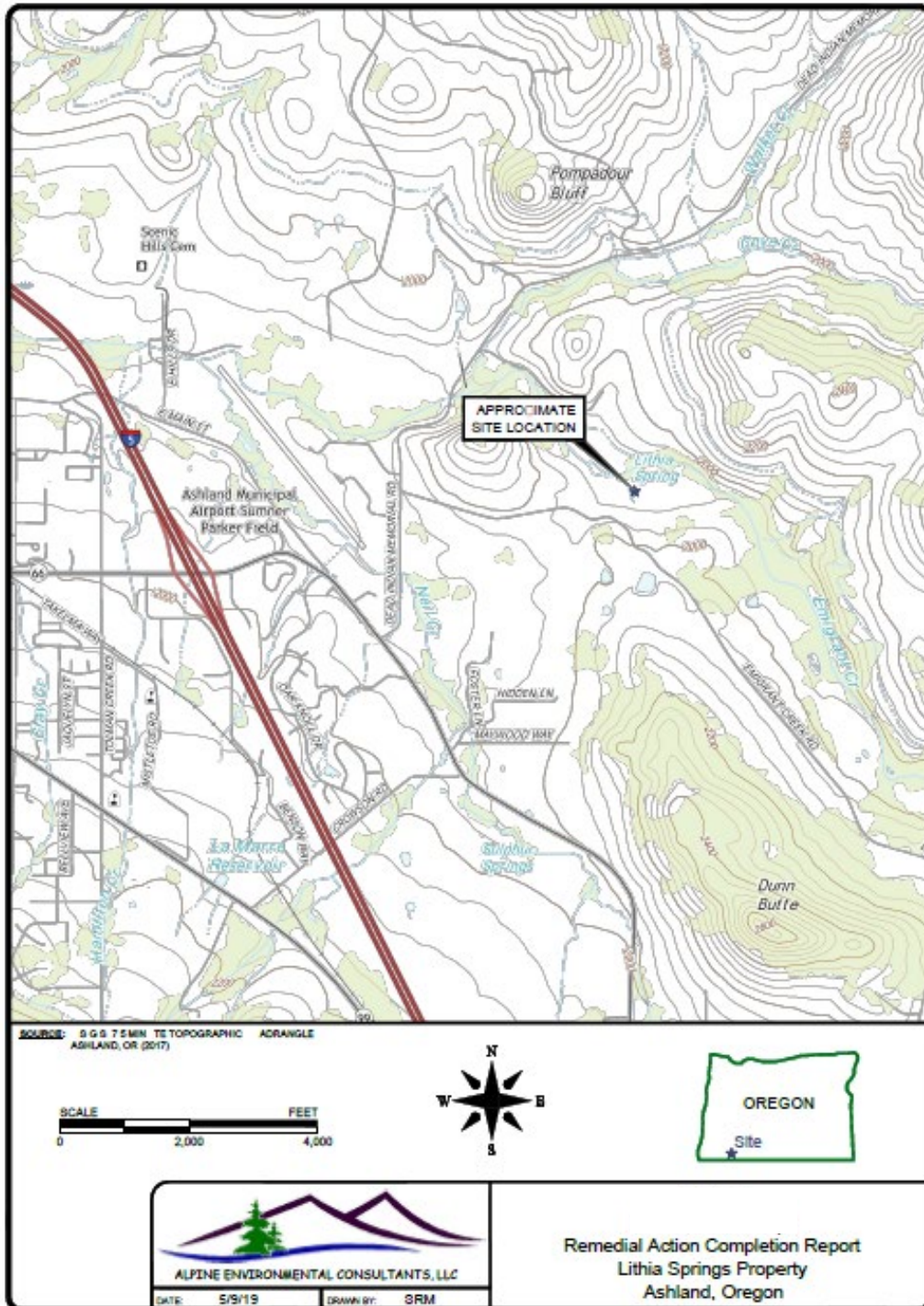


Figure 2: Site Map

