



DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT

BAINBRIDGE ISLAND MUNICIPAL CODE INTERPRETATION
OF THE DIRECTOR OF PLANNING AND COMMUNITY DEVELOPMENT

SPORTSMAN CLUB DETERMINATION OF USE, STATUS, AND NECESSARY LAND
USE APPROVALS/PERMITS

July 29, 2016

I. Introduction:

On March 22, 2016, the City received a building permit application for a bullet berm structure to be constructed on the Sportsman's Club property, 8203 Sportsman Club Road. In correspondence the applicant has indicated that it intends to apply for permits to construct "no blue sky beams" and a new fire line building. All these proposed improvements will be considered together. (Improvements) . The building permit application was accepted and assigned project number BLD21400C-MIS (Permit). The Department of Planning and Community Development began processing this Permit. During the course of this application and review process, the City has received many communications, both from the Sportsman Club and interested citizens. This correspondence has raised numerous issues surrounding the identity of the Property's use, whether the requested use of the bullet berm structure and rifle range is legal, and whether additional land use approvals/permits are required. As a result of these issues, the Director has determined that official interpretations of the Municipal Code are required to resolve these issues and provide the applicant and the public with a clear explanation of how the City intends to process this Permit. This interpretation is pursuant to Bainbridge Island Municipal Code (BIMC) 18.03.090.

II. Factual Background:

The Bainbridge Island Sportsmen Club (Club) owns property located at 8203 Sportsmen Club Road. (Property). The Property is zoned R-4. The Club has existed on the Property since 1939. The rifle range began operations in the 1960's and the current rifle range building opened in the early 1970's. The City incorporated on February 28, 1991. Based on information provided by the Club, the City believes and determines that the uses on the Property were legal uses in the County at the time of the City's incorporation. The Club also operates a pistol range, skeet range and archery range, which are not at issue in this permit application. The rifle range had three firing positions for large caliber rifles and six firing positions for .22 caliber rifles. The current application seeks approval to provide improved operational safety features by installing a berm cap cover and to perform some grading of the range. In addition, the Sportsman's Club has indicated their desire to install additional operational safety features that include "no blue sky beams" to prevent projectiles from leaving the range, and replace the fire line building to enhance noise management. The same number of firing positions will exist.

III. Determination of Use:

There has been considerable discussion among City staff, the applicant and the public as to the current use of the Property and whether such use is allowed in the zone, whether the use is a legal non-conforming use and if so whether such legal non-conforming status has been lost. The Director interprets the Municipal Code to classify the current use of the Property as "club". BIMC 18.36.030(50) defines "club" as "a meeting place for an incorporated or unincorporated association of persons organized for some common purpose, including social, educational, literary, political or charitable purpose operated by a private nonprofit or noncommercial organization." Based on information provided by the Club the City believes and determines that the Club is a nonprofit or noncommercial organization.

Under the table of uses in BIMC 18.09.020 a club is an allowed use in the R-4 zone with a conditional use permit. Currently the Club does not have a conditional use permit for its activities on the Property. A non-conforming use is defined in BIMC 18.36.030 (169) a "use of land that was lawfully established and has been lawfully continued, but does not conform to the regulations of the zone in which it is located..." Because the Club does not have a conditional use permit as required by the zoning, the Director determines that the existing use of the Property as a club is an existing legal non-conforming use.

IV. Loss of Non-Conforming status:

A legal non-conforming use may continue unless certain events occur. These are set forth in BIMC 18.30.020. Subsection A provides that the use may not be enlarged, increased or extended to occupy a greater area of land or structure. In this case, the Club is proposing at least three new structures, namely the berm cover, the "no blue sky beams" and the new fire line building. While the use of the Property as a club will not occupy a greater area of land, the use of the Property will be increased by the addition of these new structures. As such the new structures will not be entitled to non-conforming status.

Subsection B provides that the use may not be moved to any other portion of the Property. The rifle range is located in the same area as the former rifle range. Therefore, there is no loss of non-conforming status under this provision.

Subsection C provides that the use cannot cease for more than 180 days. While the rifle range has been closed for more than 180 days, the use of the Property, namely as a club, has not ceased. Therefore, there is no loss of non-conforming status under this provision.

Based on the above, the Director determines that the Club has not lost its non-conforming status as a club. However, the proposed and desired expansion of structures, including: the berm cap, no blue sky beams, and reconstruction/expansion of the fire line building trigger a loss of legal non-conforming status, for those added or expanded structures.

V. Necessity of other Land Use Approvals/Permits:

1. *Site Plan and Design Review (SPR)*. BIMC 2.16.040(B)(1) requires a SPR permit for "new construction of a non-residential building or other structure." The submitted building permit seeks approval for the construction of a berm cap structure. The Sportsman's Club has also indicated their desire to demolish and construct a new fire line building for the rifle range in addition to the construction of the "no blue sky beams".

- a. The Municipal Code contains exclusions from obtaining a SPR.
 - i. BIMC 2.16.040(B)(2)(a) does not apply in this situation.
 - ii. BIMC 2.16.040(B)(2)(b) provides that a SPR permit is not required for “any activity that does not require a building permit or is not considered a change in use, as determined by the Director.” The proposals do require building permits. The Club has argued that since the use has not changed, this section of the Code means that they are not required to obtain a SPR. While the Director has determined that the use of the Property is club, and this has not changed, the Director determines that this section of the Municipal Code does not apply. One reason of this interpretation is that subsection (b) is only applicable if there is not a change in use and no building permit is required. Interpretation of the Municipal Code to exempt SPR solely on the basis that there is no change in use would allow the exception to swallow the rule. Moreover, such interpretation is at variance with consistent past practice of the City.
 - iii. BIMC 2.16.040(B)(2)c provides that no SPR is required for “any activity on the exterior of a building that does not exceed 25 percent change in any existing façade or roof form. The Director determines that this exclusion does not apply because the new fire line building is not a change to an existing façade or roof form, but a new structure. The beams and berm cover do not fall under this exception.
 - iv. BIMC 2.16.040(B)(2)(d-f) do not apply in this situation.
2. *Conditional Use Permit(CUP)*. While the Director has determined that the use of the Property is a legal non-conforming use, which was not terminated, the proposed new and expanded buildings and structure will require analysis under a conditional use permit. The Club has argued that it falls within one of the exceptions to requiring a CUP pursuant to BIMC 2.16.050(B)(2). The Director determines that none of these exceptions apply.
 - a. BIMC 2.16.050(B)(2)a is identical to the exception discussed in V. 1. a. ii, above. This interpretation is consistent with past City practices requiring a new CUP in instances where new buildings were being proposed including the new fire station and schools.
 - b. BIMC 2.16.050(B)(2)b deals with "a one time expansion of an existing use up to 25%. This exclusion is not applicable because the Club utilized this exclusion when it obtained permits to build the archery range in 2010.
 - c. BIMC 2.16.050(B)(2)(c-e) do not apply in this situation.

VI. **CONCLUSION**

Based on the interpretations contained above, the Director determines that the Club will need to obtain a SPR for the Improvements to the Property and a CUP limited to the new structures proposed as part of the Improvements.

DATED THIS 29th DAY OF JULY 2016.



Gary R. Christensen, AICP

Appeal Procedures:

BIMC 2.16.020(P) provides that any appeal of the Director's interpretations set forth herein are made to the City's Hearing Examiner. Any appeal must be filed with the City Clerk within 14 days of the date of this decision.

Attachments:

- A. Letter to James Weaver providing information regarding Bainbridge Island Sportsman Club improvements, dated June 17, 2016
- B. Drawings showing desired rifle range improvements at the Bainbridge Island Sportsman Club

City of Bainbridge Island

JUL 6 2016

Planning and
Community Development

June 17, 2016

James Weaver
City of Bainbridge Island
280 Madison Ave. North
Bainbridge Island, WA
98110



Dear Mr. Weaver,

This is in response to your letter of June 9, 2016. To address each component of your letter, we scanned the letter interlineated our responses on a paragraph by paragraph basis, beginning each with "*Response:* ".

We hope that our response provides you with the facts regarding our rifle range project, and lays to rest the misconceptions and misinformation regarding it. We are eager to cooperate with the City and to move this project along, and as always to comply with City policy and procedures.

Sincerely,


Alan J. Kasper
President
Bainbridge Island Sportsmen Club

June 9, 2015

Alan Kasper, President BISC
Bainbridge Island Sportsman's Club
8203 Sportsman Club Road
Bainbridge Island, WA 98110

RE: Building Permit BLD2L400C-MIS Information Required for Processing

Hello,

Thank you for considering this correspondence. This correspondence is a cubulation of the comments, requirements, and additional information by the City of Bainbridge Island required to continue to review and processing of the submitted building permit (Bainbridge Island Building Permit #81D21400C-MIS).

The building permit application for a bullet berm structure to be constructed at the existing rifle range located at 8203 Sportsman Club Road, (Assessor Parcel Number #22250230322104) was received by the Building Division on March 22, 2016. In review of the project, the project file was routed to the Bainbridge Island Fire Department, the Bainbridge Island Historic Preservation Commission, and internally within the divisions of the City of Bainbridge Island Department of Planning and Community Development. The requirements below for additional information is the result of the initial review of the proposed Sportsman's Club Rifle Range Bullet Berm Project (81D21400C-MIS).

In July 2009, the entire Sportsman Club property was determined to be historic by the Bainbridge Island Historic Preservation Commission (Permit# HPR15856). In the review, the Bainbridge Island Historic Preservation Commission reviewed the project, indicated that the current location and use was established in 1939 and the project reviewed the proposed project at their May 5, 2016 regular meeting. The Historic Preservation Commission issued a Certificate of Appropriateness on May 5, 2016.

In review of the project, substantial interest and concerns have been expressed by neighbors and island citizens regarding the project. Numerous documents were provided to the Department for consideration by concerned citizens, including documents from the Sportsman Club regarding their environmental cleanup efforts for their shotgun range, excerpts from the National Rifle Association (NRA) 2012 Range Source Book documents, the US Department of Energy 2012 Range Design Criteria for federal facilities, and Engineering Technical Letters from the Department of the Air Force.

This correspondence and the request for additional information below is the accumulation of the Department review, comments, requirements, and additional information need to continue to review and processing of the project

Development Engineering:

1. The proposed project includes more than 7,000 square feet of disturbed area, more than 500 square feet of new structure footprint, and more than 5000 square feet of new impervious surfaces. Pursuant to the Bainbridge Island Municipal Code Sections 15.20 and Section 15.21, an engineered Storm water Management Plan must be provided pursuant to the standards and requirements identified in municipal code.

Response: While it is true that the crushed clean gravel we are putting down is just over 7100SF it is important to note that this is "clean gravel". We also understand that your permit guidelines state that gravel is impervious. However the gravel we are using is specifically designed to permit water flow. The reason we are using clean gravel is precisely so that it does drain and does not become an impervious surface. The drainage will be into a trench that will funnel the water through 30 feet of limestone for the purposes of removing trace elements of lead that may occur on the range. This article talks to using limestone as a means of removing lead from water.

<https://www.researchgate.net/publication/244611329> Removal of Lead from Water Samples by Sorption onto Powdered Limestone

2. Bainbridge Island Form #B109 Surface and Storm water Management (SSWM) Plan form has been provided for your use and completion. A completed copy of this form must accompany the required Engineered Storm water Management Plan submittal for this permit to be reviewed and processed.

Response: We will accommodate your request for a SSWM plan.

Building:

3. An separate grading permit will be required to continue review of the project. Although initially indicated at the front counter that no substantial grading would accompany the bullet berm structure, the initial construction plans indicate a total of 200 cubic yards of material to be included as part of the structure. On May 31, 2016 a revision was submitted to the plans that indicated that only 90 Cubic Yards of material grading would be proposed. Based upon the revised documents, a separate grading permit would be required.

- a. A separate grading permit application (Bainbridge Island Form # B213) for the grading of the 90 cubic yards will need to be completed and the application has been included with this letter for your use.

Response: We will resubmit the grading permit request.

4. In review of the proposed project, it was noted that the existing rifle range location, direction, and orientation, was proposed to remain consistent with the current use, and that the proposed project design of 100 yard rifle range intent was to improve safety of the existing facility. The proposed range targets were identified at 75 feet from the North property line, significantly further away than the distance for the existing range.

Response:

The range targets will not be 75 feet from the North property line. At most the target line might move a single yard or so north to be completely under the proposed berm cap.

5. Please provide construction drawing for the proposed new firing line building located on the site plans for the proposed firing line cover structure. The structure outline on the site plan indicated that the firing line cover proposed is approximately 20 feet by 30 feet and would not be exempt from a building permit pursuant to the 2012 International Building Code, Section 105.2. Please submit the construction plans for that structure with the resubmittal.

Response: We understand that a building permit for the firing line building will be required, and we intend to request such a permit. We have not done so to date because we were taking a staged approach to range construction, based on our discussion with City personnel at the front desk.

6. In review of the proposed civilian rifle range improvement project, the consideration for current use design criteria included the 2012 National Rifle Association Range Source Book (11250 Waples Mill Road, Fairfax, VA 22030) and may be identified as the minimum standards for construction for ensuring public safety and welfare. An excerpt of the 2012 NRA Range Source Book, Article 3.

Response: Our design is the reflection of numerous information sources including the NRA Source Book. We also use National Shooting Sports <http://nssf.org/> as an information source. And the EPA's *Best Management Practices for Lead at Outdoor Shooting Ranges* https://www.epa.gov/sites/production/files/documents/epa_bmp.pdf. Although not specifically applicable per se to *outdoor* ranges we also embrace policies specified in the *NIOSH Alert, Preventing Exposures to Lead and Noise at Indoor Firing Ranges*. <https://www.cdc.gov/niosh/docs/2009-136/pdfs/2009-136.pdf> We have also spoken with multiple range designers and have incorporated their advice into our overall design.

Outdoor Ranges has been provided for your reference and consideration and was utilized regarding the proposed project and the review comments attached.

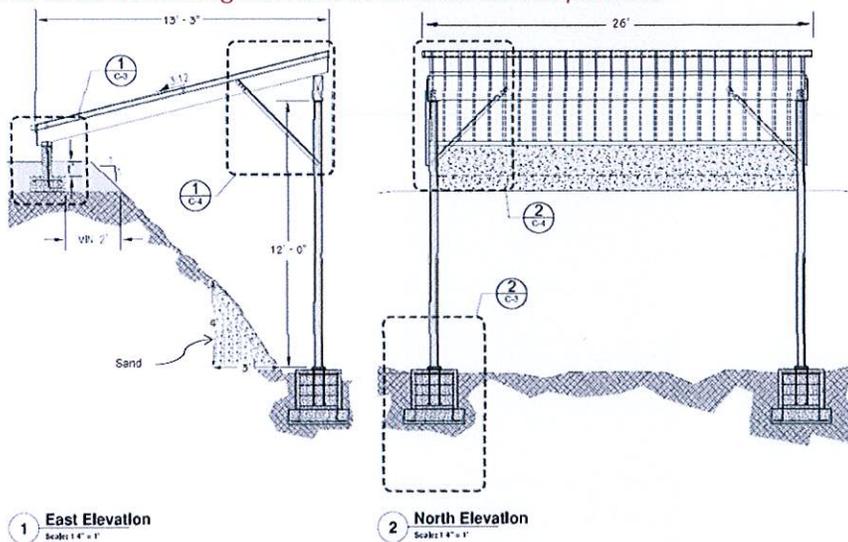
- a. Backstop / Bullet Impact Berm: The proposed Backstop / Bullet Impact Berm identified on the construction plans {Sheet C-1 and Site Plan} indicates a total height of 10 feet for the backstop / bullet impact berm. The 2012 National Rifle Association Range Source Book, Section 3.04.5.1 c includes a minimum recommended height of 20 feet for a backstop. Without the benefit of a downrange area with high terrain features or significant distance to the property line, a recommendation for the design to be modified to meet the 2012 National Rifle Association Range Source Book design criteria (document has been attached for your use and consideration).

2012 National Rifle Association Range Source Book, Section 3.04.5.1 c {excerpt}

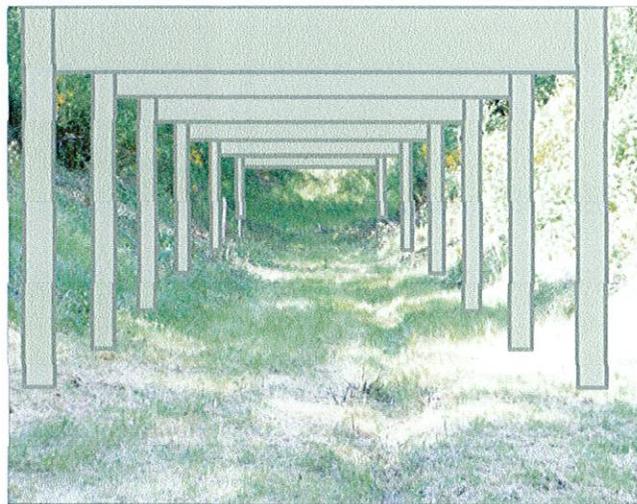
Height: The recommended height for a backstop is 20 feet high, except where the down range area is backed up by high terrain features, such as a large hill or a mountain, or by sufficient distance, to contain occasional ricochets. Terrain and topographical features should always be considered when designing a range. This is especially true with a 50 foot range, often used by youth shooting sports programs, where 10 feet is commonly recognized as the appropriate height.

Response: Our existing backstop berm has been surveyed at **24 feet tall**. Hence we are fully compliant with the NRA Source book recommendation.

Perhaps the confusion lies with the top of the berm cap which is 15 feet tall. It is specifically designed somewhat lower than the top of the berm to better protect the sand berm and bullets contained therein from moisture. This reduces the chance of lead leaching into the soil between mining activities to remove lead deposited.



Nonetheless the height of the berm cap and for that matter the actual berm height is somewhat irrelevant in that the no blue sky beams only permit a view for shooters that is approximately 7 feet high. Herewith is an artist's conception of the view downrange from the shooters position. Please note the tunnel affect that is presented to the shooter. The bullet cannot go up and out and the side berms restrict the bullet from leaving the range either left or right.

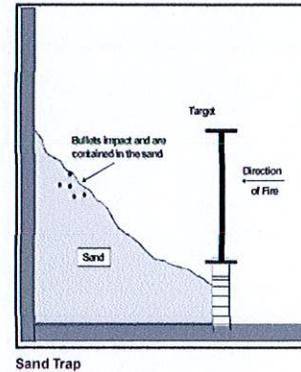


- b. Overhead Baffles: The proposed overhead baffle cap design indicates a proposed use of plywood and 2" x 4" dimensional lumber with gravel filled voids.

Response: Our berm cap is designed with a 2" x 4" gravel filled plywood box. However the baffling reference of the Source Book, Section 3.04.6.1.1 specifically applies to baffling designed to stop a full frontal impact of a projectile. Our berm cap is not designed for that purpose.

The design of the berm cap was in support of our EPA compliant sand trap was at least in part taken from the EPA's Best Management Practices for Lead at Outdoor Shooting Ranges.

https://www3.epa.gov/region02/waste/leadshot/epa_bmp.pdf. This was done for lead management purposes.



The primary purpose of our berm cap is to keep the "ballistically acceptable" sand (EPA recommended) at least partially isolated from rainfall. We added the rock filled aspect of the berm cap again out of an abundance of caution to capture unlikely ricochets emitting from our "ballistically acceptable" sand trap. The NRA Source Book is silent on Berm Caps.

- i. Constructed Baffle cap Lumber Depth: The 2012 National Rifle Association Range Source Book, Section 3.04.6.1.1 includes a minimum recommended design criteria for plywood boxes utilizing a minimum of 2" x 5" dimensional lumber with a minimum of ¾" crushed rock. In some cases 2" x 8" or 2" x 10" dimensional lumber is recommended. Without the benefit of a downrange area with high terrain features or significant distance to the property line, a recommendation for the design to be modified to meet the 2012 National Rifle Association Range Source Book design criteria 2" x 6" minimum, but given the downrange proximity preferably 2" x 10" dimensional lumber with a minimum of ¾" crushed rock would be recommended.

(document has been attached for your use and consideration).

Response: The NRA Source book Section 3.04.6.1.1 is not labeled "Constructed Baffle cap Lumber Depth". It is labeled "Overhead Baffles". There is no reference to "Baffle Caps" in the NRA Source book. Section 3.04.6.1.1 states in part:

3.04.6.1.1 Overhead baffles are used to contain the flight of bullets to a specified area within the range. These overhead baffles are useful in areas where space is limited. Baffles are also described in sections on particular shooting activities (see drawings A/A-17, A-17, A-20, B/A-20, C-7, C-24, C-25, and C-62).

- a. Material: Construct baffles from a variety of materials, but make long-term low maintenance a design consideration. Reinforced concrete, steel, wood and high-impact, bullet-resistant plastics are some of the materials available.

The NRA Source Book is silent on Berm Caps.

We will not be using plywood boxes as baffling as they are prone to failure.

Consultants have recommend glulam beams backed by steel. Poulso Sportsmen Club is in the process of replacing some of its gravel filled baffles with steel supported baffles. Note that the NRA Source book references steel as an appropriate medium for baffling.

2012 National Rifle Association Range Source Book, Section 3.04.5.1 e(excerpt)

Plywood can also be used for baffles. To do so, construct long boxes out of plywood and 2 x 6 inch lumber to be filled with a medium capable of stopping any bullet fired on the range, such as 3/4 inch crushed rock. Prior to baffle construction, select and test materials to be used in baffle construction to determine effectiveness for bullet containment. In some cases, the baffle must be designed with 2 x 8 inch or 2x10 inch lumber' Test every design to determine if it will stop the projectiles used at the range. If it fails, increase the baffle's depth until you can effectively stop and contain the projectile. This will also require engineering the support structure to handle the additional load.

Response: What it says in this excerpt is to "Test every design to determine if it will stop the projectiles used at the range." This is exactly what we have been doing and why we have not yet submitted a request for permit for the baffling design and structure as we had not completed testing. The photo herewith displays the result of a 300 Winchester Short Magnum 180 gr. at ~ 3100 fps bullet striking a steel plate after it had passed through a 5 inch glulam beam. It was successful. We have also tested a .416 Taylor with a 350 gr. monolithic bullet at ~ 2400 fps with the same result.



- ii. Constructed Baffle Cap Material Options: The proposed overhead baffle cap design indicates a proposed use of plywood and dimensional lumber with gravel filled voids. The 2012 National Rifle Association Range Source Book, Section 3.04.6.1.1 f includes an option for overhead baffles to include conveyor belting to the face of the baffle cap to reduce the velocity of the projectile. Given the downrange proximity consideration of the option identified in the 2012 National Rifle Association Range Source Book, Section 3.04.6.1.1f may be considered. (document has been attached for your use and consideration).

2012 National Rifle Association Range Source Book, Section 3.04.5.1 F (excerpt)

Baffles designed using dimension lumber and built (See drawing A-14) are acceptable for pistol ranges. Recommend testing the baffle to ensure that projectiles will be contained. You may add conveyor belting to the face of the baffle. This will reduce the velocity of the projectile, help protect the baffle, and will not be a reactive target for the shooter. As a projectile impacts the baffle, the remaining velocity and aerodynamic properties of the projectile change significantly. . Projectiles may travel the legal length of the property as long as they remain on property owned or controlled by the range.

Response: See response to 6.b.i above.

- iii. Constructed Baffle Cap Width: The proposed overhead baffle design indicates a proposed baffle width of 26 feet across a proposed 20 foot wide rifle range. The top of the side berm on each side of the proposed range occurs on a topographical elevation of 195-197 feet. The width of the top of the side berm is approximately 60 feet across as shown on the site plan. The 2012 National Rifle Association Range Source Book, Section 3.04.6.1.1 g includes that the overhead bullet baffle cap must extend the entire width of the firing line and connect to either a side wall or side berm. Given the downrange proximity, the recommendation is for a design modification of the overhead baffle cap to extend to the top of each side berm, or inclusion of side baffles, to be consistent with 2012 National Rifle Association Range Source Book, Section 3.04.6.1.1 g (document has been attached for your use and consideration).

**2012 National Rifle Association Range Source Book, Section 3.04.5.1 G
{excerpt}**

Size: Overhead baffles must extend the entire width of the firing line and connect to either a side wall or side berm.* Recommend concrete slabs be a minimum of 4 feet wide, 6 to 8 inches thick and 15 to 40 feet in length, and have a 5,500 psi rating. Lengths up to 40 feet of pre-stressed concrete will increase the effectiveness of the range design and give a larger open area without obstruction from support structures. Build wood/steel laminated panels 15 feet long and 4 feet wide. Thickness depends on laminations required for a specific range. Do not forget to design baffles taking snow and/or wind loads into consideration.

Response: Response: We have no idea what baffle design the City is referring to since we are still in our testing phase and have not yet requested a permit or suggested a design. However our side berms exist today and feature a side hill on

either side of the range. These side hills can be seen in "artist's conception" presented in 6.a above.

Planning:

7. On May 31, 2016, a revision was submitted to the plans that indicated that only 90 Cubic Yards of material would be proposed. Based upon the revised documents and at this point of the project, SEPA environmental review would not be required for the scope of this particular project.

Response: We concur.

8. As a component for review of the nature and extent of the existing use, please submit information related in establishing the existing conditions on the site and addressing any new impacts from the proposed construction or resumed use. Please include either a narrative or supplemental information regarding the following items in responding to this explanation of the existing use.

- a. A scaled site plan of the gun club property showing all of the existing improvements, structures and uses. The same plan or separate plan should also depict the location of the proposed improvements.

Response: We have provided a site plan.

- b. A description of the existing or previous use of the shooting range and any new proposed use, including the types of rounds (i.e. caliber, black powder, shot size, etc.), the type of weaponry (i.e. Pistol, rifle, shotgun, automatic, muzzle loading, cannon, other, etc.) used on the range.

Response: We will maintain compliance with State regulation 9.41.290

<http://apps.leg.wa.gov/RCW/default.aspx?cite=9.41.290> Consistent with our past use we will permit typical calibers including but not limited to .22 rim fire, .222, .223, .30-30, .30-'06, .308, .338, .375, 45-70, .416, .458. We will specifically include black powder rifles. Shotguns will be permitted. Pistols will be permitted at the discretion of the Range Safety Officer. We will specifically exclude .50 BMG rifles and fully automatic weapons. Canons will not be permitted. We will specifically exclude armor piercing, incendiary, tracer and explosive ammunition in all calibers. All shots will be through the muffler box including police use.

It should be noted that all shooting with the exception of 22 rim fire will be through the muffler boxes. The muffler boxes are our first line of defense in projectile management. The existing (and planned) muffler boxes contain a top steel plate. This steel plate is highly effective at deflecting errant shots into the berm even against the most powerful rounds due to the acute angle the bullet comes in contact with the steel plate. This is in part a reason why there is no record of a rifle projectile ever escaping our range. Additionally we will be proposing steel backed no blue sky beams and the rock filled berm cap as additional methods of bullet containment.

- c. A description of the existing or previous use and any changes of the shooting range regarding hours of operation, days of operation, number and/or type of events, etc.

Response: Our shooting hours will be within our published standards currently available on our web site. <http://www.biscwa.org/rifle-range-at-bisc/rifle-range-policies-procedures> These standards are subject to change by our board and general membership. The actual hours for the rifle range have not yet been determined.

- d. A history of permits obtained and structures built on the subject property since City incorporation.

Response: The Club does not maintain a library of permits and/or construction projects. Based on member memory we have: 1) resided our club house, 2) removed a dangerous ecology block fence and replaced it with a wooden fence on the trap range, 3) added an archery range, 4) enhanced our existing pistol range, 5) added improved lighting on the trap range and 6) have an City approved plan to replace the front porch of the Club house. All of these items were permitted. Additionally we received a permit to grade our rifle range according to our first grading plan which we have since abandoned due to scope and cost constraints. A replacement plan is currently pending at the City.

- e. A description of the existing or previous use and any proposed changes of the shooting range regarding range control procedures, operation protocols, safety provisions, (including, but not limited to, the illustrated depiction on a site plan of on and off-site "safety danger zones," etc.

Response: There will be no "off site safety danger zones". Our policies for rifle range operation are found at this link. <http://www.biscwa.org/rifle-range-at-bisc/rifle-range-policies-procedures> They are subject to change by the Club board.

- f. A description of the existing or previous use of the shooting range regarding contamination control, materials handling protocols, environmental measures or mitigation, etc.

Response: Historically we used lime products such as dolomite to manage lead on our property. We will continue the use of products that fix lead onto our property. Our club was founded in 1929 where members began shooting at targets simply nailed to a tree. Since then we have significantly improved our procedures both from a containment perspective and ecological perspective. In 2009 the Kitsap County tested both water leaving the property and the pond on the east side of Sportsman Club Road. No lead above normal background levels was found either in the pond or in the drainage.

- g. A description of any proposed contamination control, materials handling protocols, environmental measures or other proposed mitigation.

Response: As mentioned above, we will be using several mechanisms to mitigate contamination. 1) The Berm Cap and sand berm are in compliance with the EPA guidelines for lead management at outdoor ranges. See https://www3.epa.gov/region02/waste/leadshot/epa_bmp.pdf. 2) We will periodically mine the lead using protective clothing and sand filters to extract the lead. 3) Lead recovered from our berm will be taken to an EPA approved lead recycler such as Navy City Metals Bremerton within 24 hours. 4) We will periodically spread a lime product such as dolomite on the range to fix lead. 5) All rain water falling on the range will be directed through the proposed trench which will feature 30 feet of limestone to fix the lead. This paper shows the effectiveness of using limestone to remove lead from water. <https://www.researchgate.net/publication/244611329> Removal of Lead from Water

CC: Gary R. Christensen, AICP, Director Department of Planning and Community Development
Joshua Machen, AICP, Planning Manager, Department of Planning and Community Development

Enc: Attachment A: COBI Form # 8109 Surface and Storm water Management (SSWM)Plan
Attachment B: COBI Form # 8213 Grading Permit Checklist
Attachment C: 2012 National Rifle Association Range Source Book

LEGAL DESCRIPTION

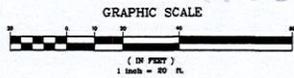
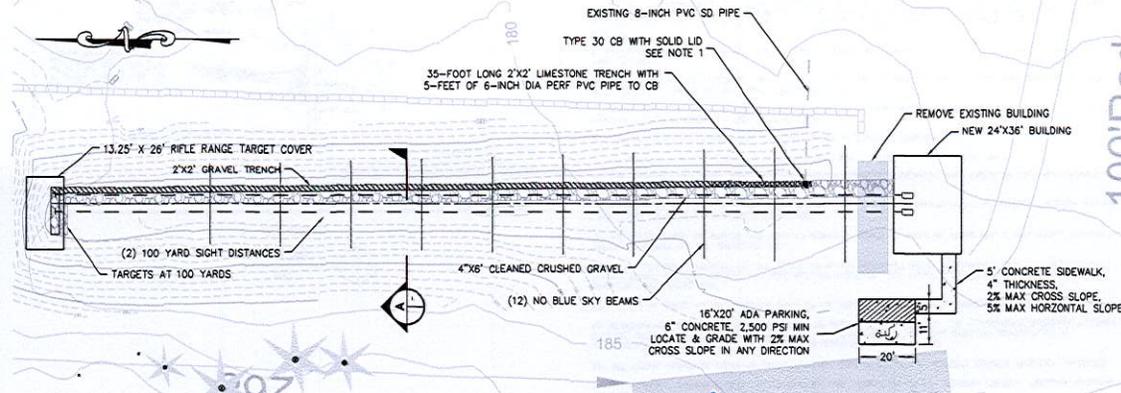
EXCEPT TAXABLE PORTION TO 222502-3-032-2104 (PER DOR REG NO 10901.001) THE EAST 16.82 ACRES OF THE NORTH 20.93 ACRES OF THE SOUTHWEST QUARTER OF THE SOUTHWEST QUARTER, SECTION 22, TOWNSHIP 25 NORTH, RANGE 7 EAST, W.M.; EXCEPT ROAD.

S 22 T 25N R 2E WM

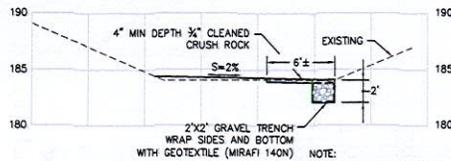
**BAINBRIDGE ISLAND SPORTSMAN CLUB
RIFLE RANGE IMPROVEMENTS**



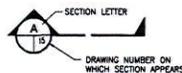
VICINITY MAP
N.T.S.



RIFLE RANGE SITE PLAN
SCALE: 1"=20'



SECTION
SCALE: 1" = 5'



ON PLAN



AT SECTION

SECTION INDICATORS:



ON PLAN



AT DETAIL

ABBREVIATION

CL	CENTERLINE
CONC	CONCRETE
CSTC	CRUSHED SURFACING TOP COURSE
CSBC	CRUSHED SURFACING BASE COURSE
EOP	EDGE OF PAVEMENT
ELEV	ELEVATION
EXIST	EXISTING
FG	FINISH GRADE
FF	FINISHED FLOOR
FL	FLOWLINE
GB	GRADE BREAK
IE	INVERT
LF	LINEAR FOOT
LT	LEFT
MIN	MINIMUM
N	NORTH
OHW	ORDINARY HIGH WATER
PE	POLYETHYLENE
PT	POINT
RT	RIGHT
S	SOUTH
SD	STORM DRAIN
STA	STATION
STR	STRUCTURE
TOC	TOP OF CONCRETE
TP	TEST PIT NUMBERS
TYP	TYPICAL
W/Q	WATER QUALITY

DRAWING INDEX

1	COVER, DRAWING INDEX, VICINITY MAP
2	NOTES & TESCOP
3	NO BLUE SKY BEAM PLAN & SECTIONS
4	SECTIONS AND DETAILS
5	DETAILS

EXISTING SOIL TYPE

KAPOWSIN PER SOIL SURVEY OF KITSAP COUNTY

SITE IMPERVIOUS AREAS

TARGET COVER STRUCTURE = 344.5 SF (0.008 AC)
BUILDING = 864 SF (0.02 AC)
CONCRETE AREA = 475 SF (0.01 AC)
TOTAL AREA = 1,683.5 SF (0.038 AC)

SITE CLEARING LIMITS

SITE CLEARING LIMITS = 70,229 SF (1.6 AC)

EARTHWORKS

SITE VOLUMES:
45 CY CUT
45 CY FILL
NET 0 CY CUT
VOLUMES ARE NEAT LINE QUANTITIES

- NOTE:
1. GRAVEL TRENCH SHALL BE 2-FOOT MINIMUM DEPTH AND SHALL SLOPE (OR BE FLAT) TO EXISTING STORM DRAINAGE OUTLET.
2. AREA SHALL BE MOWED WITH BRUSH AND BLACK BERRIES CUT TO THE GROUND.
3. DATUM NAVD83.



PRELIMINARY

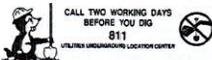
Bannon Engineering, Inc.
23789 Redden Place NE
Poulsbo, WA 98270
TEL: (360) 398-1501
FAX: (360) 398-1089

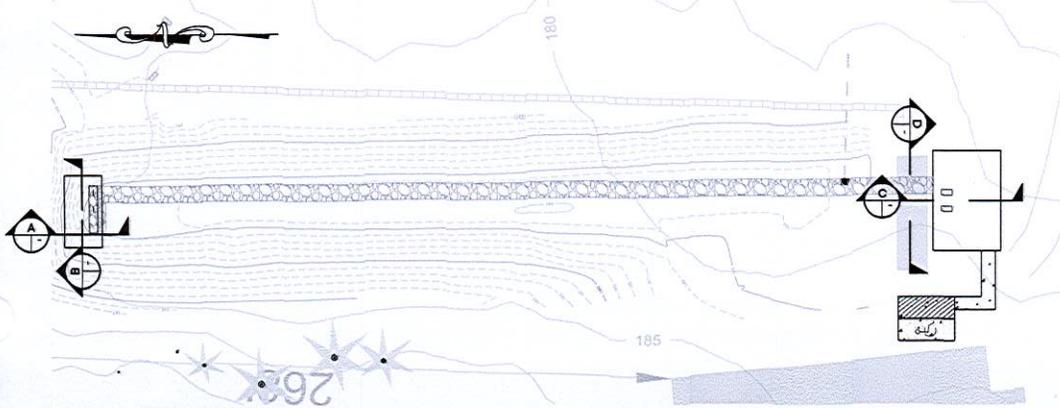
REV	DATE	ISSUE
1		
2		
3		
4		
5		

CHK. WLB	
DES. WLB	
ISSUE DATE: 7-17-16	
PROJECT NO.:	
REV. DATE:	

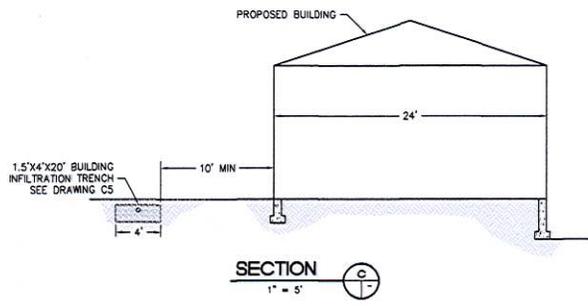
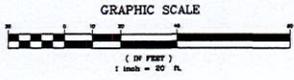
TAX PARCEL NO.: 222502-3-032-2005
PROPERTY COORDINATOR: ALAN KASPER
SITE ADDRESS: 8203 SPORTSMAN CLUB
PHONE NUMBER 206-696-0623
COVER, DRAWING INDEX, VICINITY MAP

DRAWING NO.
C1

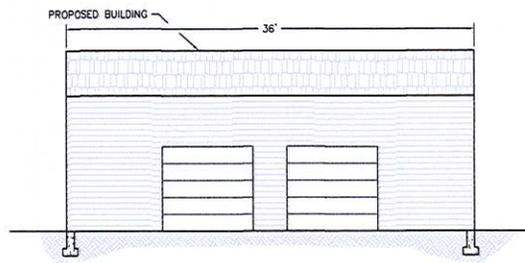




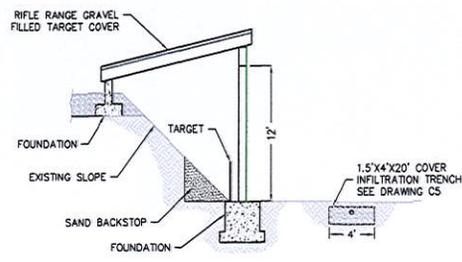
RIFLE RANGE SITE PLAN
SCALE 1"=20'



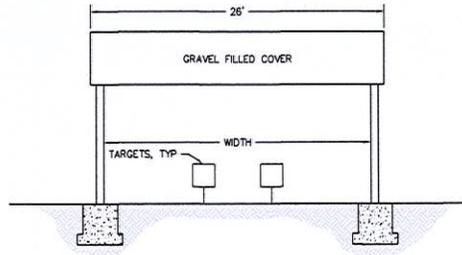
SECTION C-C
1" = 5'



SECTION D-D
1" = 5'



SECTION A-A
1" = 5'



SECTION B-B
1" = 5'

- NOTE:**
1. STRUCTURE DESIGN WILL BE SUBMITTED TO THE CITY WITH THE BUILDING PERMITS.
 2. ALL STRUCTURE ROOF AREAS SHALL DISCHARGE TO AN INFILTRATION TRENCH AS SHOWN ON DRAWING CS.

Bannon Engineering, Inc.
23789 Broken Floor NW
Poulsbo, WA 98370
TEL: (360) 946-1501
FAX: (360) 946-1549

REV	DATE	ISSUE	DRW	DES	CHK	APP
A	7-17-16	REVISED DRAWINGS				

DRW.	DUB	CHK.	WLB
DES.	DUB	APP.	WBL
ISSUE DATE:	7-17-16		
PROJECT NO.:			

TAX PARCEL NO.: 222502-3-032-2005
PROPERTY COORDINATOR: ALAN KASPER
SITE ADDRESS: 6205 SPORTSMAN CLUB
PHONE NUMBER: 206-886-0623

SECTIONS & DETAILS
DRAWING NO. **C4**



PRELIMINARY

