

LAW OFFICES OF
ANDREW L. PACKARD

245 KENTUCKY STREET, SUITE B3, PETALUMA, CA 94952

PHONE (707) 782-4060 FAX (707) 782-4062

INFO@PACKARDLAWOFFICES.COM

December 16, 2017

VIA CERTIFIED MAIL

Ukiah Rifle and Pistol Club
P.O. Box 26
Ukiah, CA 95482

Chris L. Land
Agent for Service of Process and
Secretary
Ukiah Rifle and Pistol Club
560 Saratoga Court
Ukiah, CA 95482

Public Enforcement Agencies
(See attached Certificate of Service)

**NOTICE OF VIOLATION AND INTENT TO FILE SUIT UNDER HEALTH &
SAFETY CODE § 25249.5 *et seq.* (California Safe Drinking Water & Toxic
Enforcement Act, also referred to as "Proposition 65")**

Greetings:

The Mateel Environmental Justice Foundation ("Mateel") gives you notice that the Ukiah Rifle and Pistol Club ("URPC") is, has been, will be and threatens to be in violation of Cal. Health & Safety Code § 25249.5. This law firm represents Mateel in this matter and I can be reached at the address and telephone numbers set forth in the letterhead above. William Verick, who is a responsible person at Mateel, also represents Mateel, and he may be reached at 1125 Sixteenth Street, Suite 204, Arcata, California, 95521, (707) 630-5061.

The chemicals at issue in this Notice are lead and lead compounds ("lead"). The above-referenced violations occur when people shoot guns at URPC's gun range located at 2300 Vichy Springs Road, Ukiah, California (the "gun range"). Shooting guns at the gun range causes lead-based ammunition to land on the ground there. This lead-based ammunition is thus deposited onto land or into water at URPC as the direct and immediate result of the business activities conducted by URPC at the gun range. Lead from this lead-based ammunition is deposited onto land or into water such that it is likely to enter into a source of drinking water. When rain lands on the spent lead-based ammunition, the rainwater dissolves some of the lead and runs off carrying the dissolved lead into sources of drinking water.

The sources of drinking water at issue are the Sulphur Creek Hydrologic Subarea of the Russian River Hydrologic Unit and the Russian River Hydrologic Unit itself, both of which are designated as existing sources of municipal and domestic drinking water in the "*Water Quality Control Plan for the North Coast Region (Revised May 2011)*," generally referred to as the "Basin Plan." Basin Plan, 2-11.00.

A summary of the statute and its implementing regulations, which was prepared by the lead agency designated under the statute, is enclosed with the copy of this notice served upon URPC.

These violations have occurred every day since December 16, 2016 that people shot guns at the gun range using lead-based ammunition. These violations will continue every day into the future that people shoot guns at the gun range unless and until the ammunition they use ceases to be lead-based. If you wish to discuss a resolution of the issues raised herein, please contact the undersigned at your earliest convenience.

Sincerely,

A handwritten signature in black ink, appearing to read 'Andrew L. Packard', written in a cursive style.

Andrew L. Packard
Attorneys for Plaintiff
Mateel Environmental Justice Foundation

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury under the laws of the State of California that the following is true and correct. I am a citizen of the United States, over the age of 18 years of age, and am not a party to the within entitled action. My business address is 245 Kentucky Street, Suite B3, Petaluma, California 94952.

On December 16, 2017, I served the following documents: **NOTICE OF VIOLATION, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; "THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986: A SUMMARY"** on the following parties by placing a true and correct copy thereof in a sealed envelope, addressed to the party listed below and depositing it in a U.S. Postal Service Office for delivery by Return Receipt, Certified First Class Mail:

Chris L. Land
Agent for Service of Process and Secretary
Ukiah Rifle and Pistol Club
560 Saratoga Court
Ukiah, CA 95482

Ukiah Rifle and Pistol Club
P.O. Box 26
Ukiah, CA 95482

Proposition 65 Enforcement Reporting
California Attorney General's Office
1515 Clay Street, Ste. 2000
Oakland, CA 94612

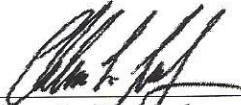
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The Honorable Xavier Becerra
Office of the Attorney General
1300 "I" Street
Sacramento, CA 95814-2919

The Honorable Charles David Eyster
Mendocino County District Attorney
100 North State Street, Room G-10
Ukiah, CA 95482

The Honorable Jill Ravitch
Sonoma County District Attorney
600 Administration Drive, Room 212 J
Santa Rosa, CA 95403

Executed on December 16, 2017, in Petaluma, California.



Andrew L. Packard