

Golf Club Shotgun Program: Lead Contamination Risks to Ground Water and Drinking Water in Floodplain Feeding the Crum Creek Watershed

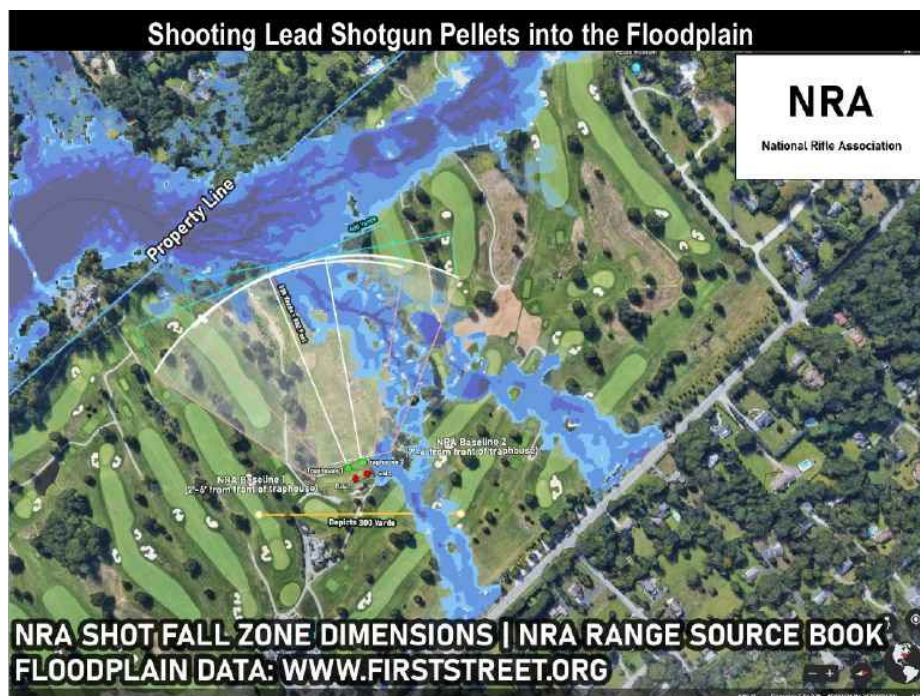
Overview: A trapshooting program using shotguns with hazardous lead shot is operated by a prestigious golf club in the midst of a downward-sloping floodplain with a stream running through it that feeds the Crum Creek Watershed, which in turn supplies ground water and drinking water to Chester County and Delaware County residents, also supplying water to the Springton Reservoir. The golf club is [Waynesborough Country Club](#) in Paoli, an affluent golf club with about 800 members. This golf club shoots at least 20 to 30 million lead pellets per year into the floodplain feeding the environmentally sensitive watershed, running the program from November through March. The golf club's trapshooting range is also located in the middle of one of the National Audubon Society's designated '[Important Bird Areas](#).'

Community Reaction: The neighboring community has complained to the golf club for several years about the noise issues, safety issues and long-range environmental risks of the shotgun program, and a sub-set of the neighbors eventually commenced noise litigation with the Club in March 2023 in the Court of Common Pleas (Docket No. 2023-02023-IR). See neighborhood website: www.stopthenoisenow.com. The noise litigation has passed the discovery/deposition phase, and motions for summary judgment were filed on August 23, 2024 by the plaintiffs (neighbors) and the defendant (the Club). The Club is represented by legal counsel appointed by the Club's insurance company, the [Cincinnati Insurance Companies](#). The neighbors are represented by Lamb McErlane of Chester County and the Club's mortgage lender is [WSFS Bank](#).

Environmental Risks: Given the Club's use of lead shot and the placement of the Club's shotgun program on a golf driving range that is in the midst of a downward-sloping floodplain, the long-range environmental risks are of concern to the neighbors and environmental non-profits; but, in publicly available Court pleadings the Club has dismissed the lead contamination risks as being irrelevant and inconsequential under the pretext that lead contamination has not yet been proven and that certain neighbors of the Club still drink their well water and bathe in it. In addition to many written communications from neighbors and their counsel, two Amicus briefs ('friend of the court' briefs) have been filed in connection with the current noise litigation by concerned non-profit entities, and a letter has also been sent to the Club's Board of Governors by 501c3 [CRC Watersheds Association](#) (CRC), which has been in operation since the early 1970s and outlines its mission as follows: "CRC Watersheds Association's mission is to support, encourage and promote the enjoyment, restoration, conservation, protection and prudent management of the natural resources of the Chester, Ridley, and Crum Creek Watersheds."

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Floodplain and Trapshooting Range Shot Fall Zones: NRA and ATA



The graphics above reflect images from Google Earth, overlaid with floodplain data from www.firststreet.org and shot fall zones as detailed by the trapshooting guidelines and shot fall zone dimensions stipulated by the National Rifle Association (NRA) and the Amateur Trapshooting Association (ATA).

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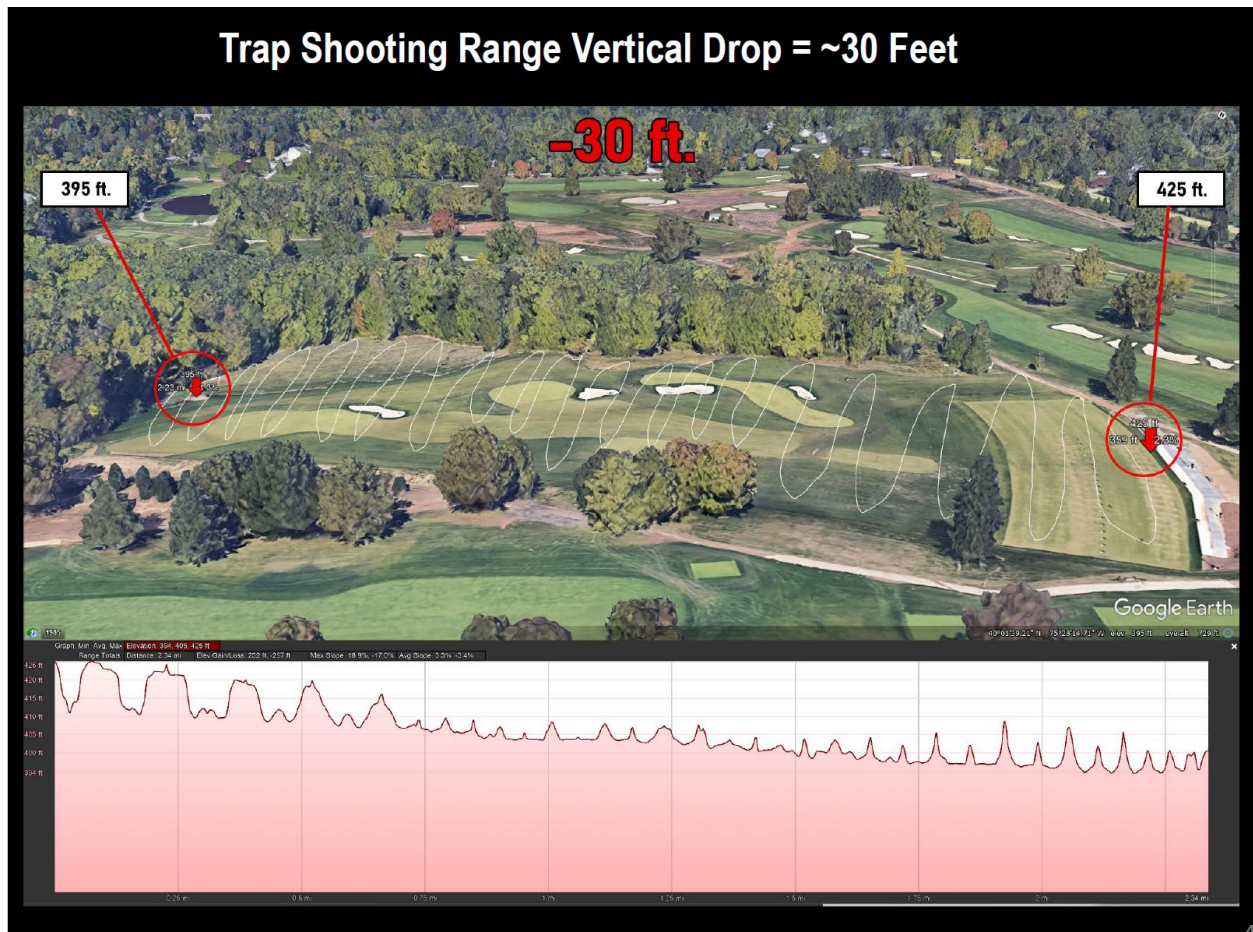


- **Lead Shot Activity November through March (five months or roughly 21 weeks):**

Conservative estimates approximate 20 million to 30 million lead pellets shot into the floodplain per 21-week season. However, after renovations to the golf driving range / trapshooting range, the Club now has two shooting locations, Field 1 and Field 2 (see drone shot above), and each location has five shooting stands. So, roughly ten people can participate in trapshooting at the same time. The trapshooters shoot lead shot downhill into the floodplain, with a stream cutting across the range which is known locally and by some Club members as 'Lead Shot Run.' The typical shooting volume for the 2022/2023 season and 2023/2024 season was approximately 20 to 30 shots per minute for three hours of each four-hour trapshooting session. That volume equals 3,600 shots (20 shots x 60 minutes x 3 hours) to 5,400 shots (30 shots x 60 minutes x 3 hours) per Sunday. Each shotgun shell contains one ounce of lead and roughly 410 lead pellets. The Club uses Winchester Xtra-Lite, 12-gauge, no.8, one-ounce lead shot. That translates to 225 pounds to 337 pounds of lead and 1.476 million to 2.214 million lead pellets deposited into the floodplain every Sunday. Over a 21-week season, this in turn translates to 4,725 pounds to 7,077 pounds of lead, or 31 million to 46 million lead pellets, although conservative estimates in Court pleadings peg the volume at 20 million to 30 million lead pellets per season.

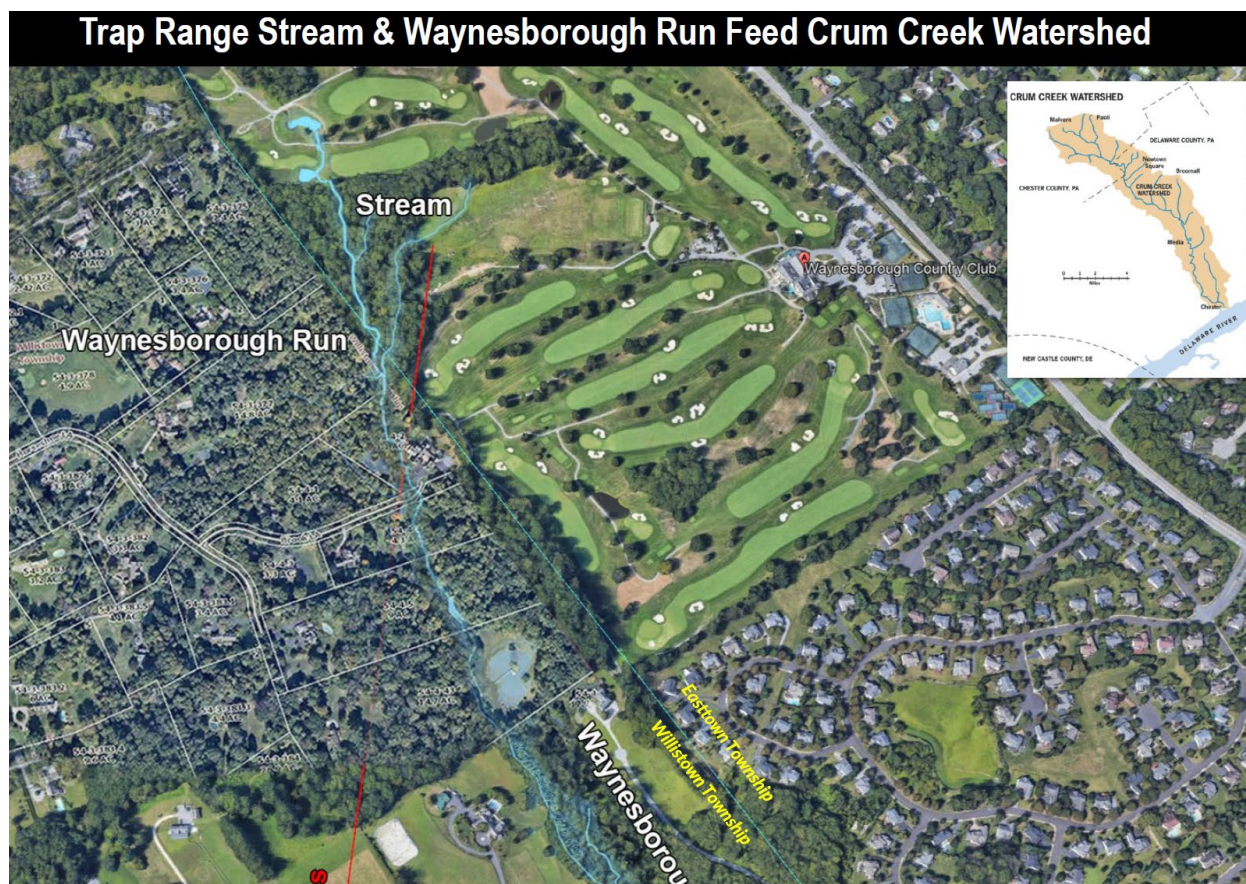
- 3,600 to 5,400 shots per Sunday / 16 ounces = 225 to 337 pounds of lead per Sunday, 4,725 to 7,077 pounds of lead per 21-week season.
- 3,600 to 5,400 shots per Sunday x 410 lead pellets = 1.476 MM to 2.214 MM lead pellets per Sunday, or 31 MM to 46 MM lead pellets per 21-week season.

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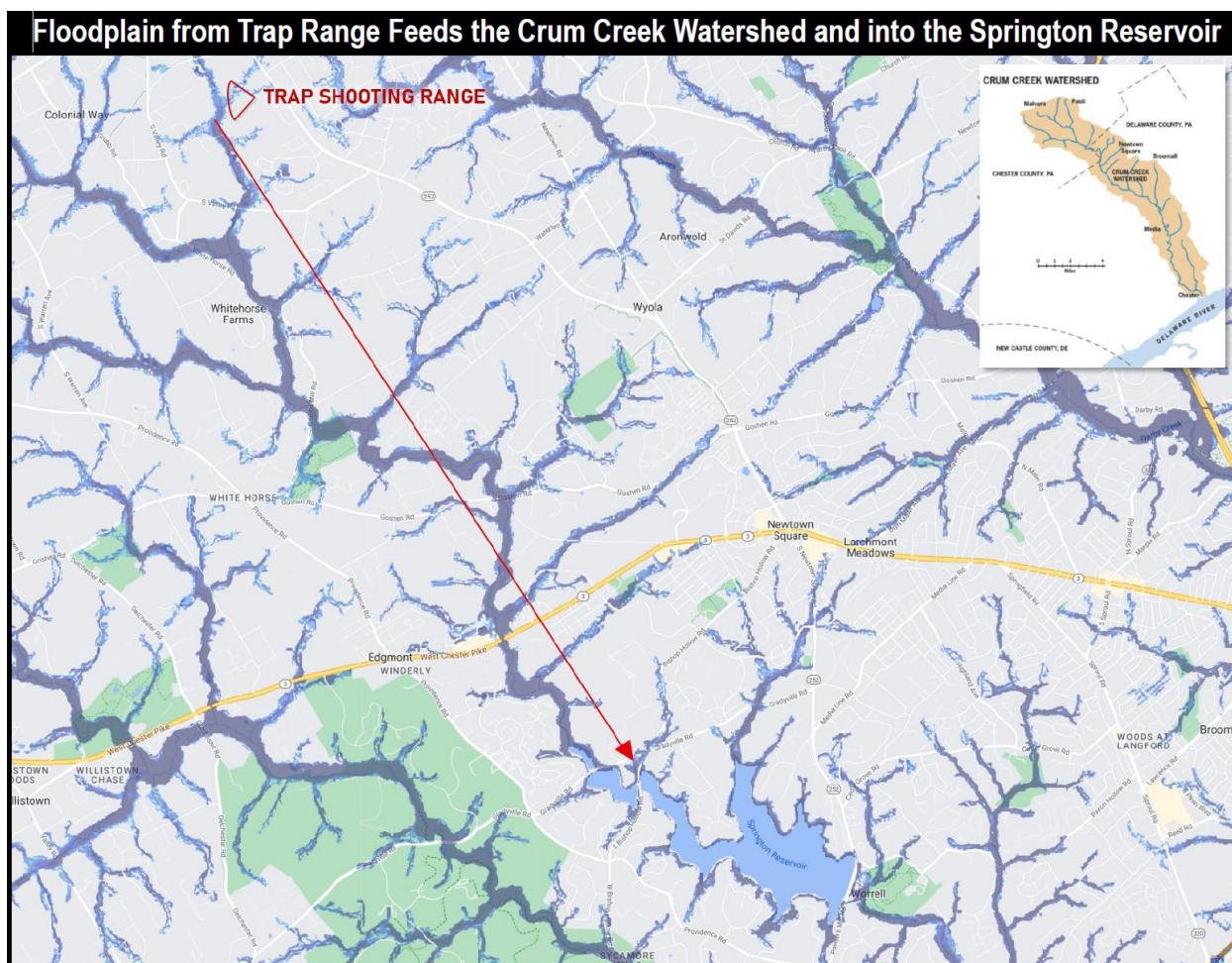
The figure above depicts a satellite image from Google Earth Pro, with an elevation graph generated by Google Earth Pro.

Golf Club Shotgun Program: Lead Contamination Risks to Ground Water and Drinking Water in Floodplain Feeding the Crum Creek Watershed



The figure above reflects an image taken from Google Earth, overlaid with a map taken from the CRC Watersheds Association: <https://bit.ly/4fQwM1T>

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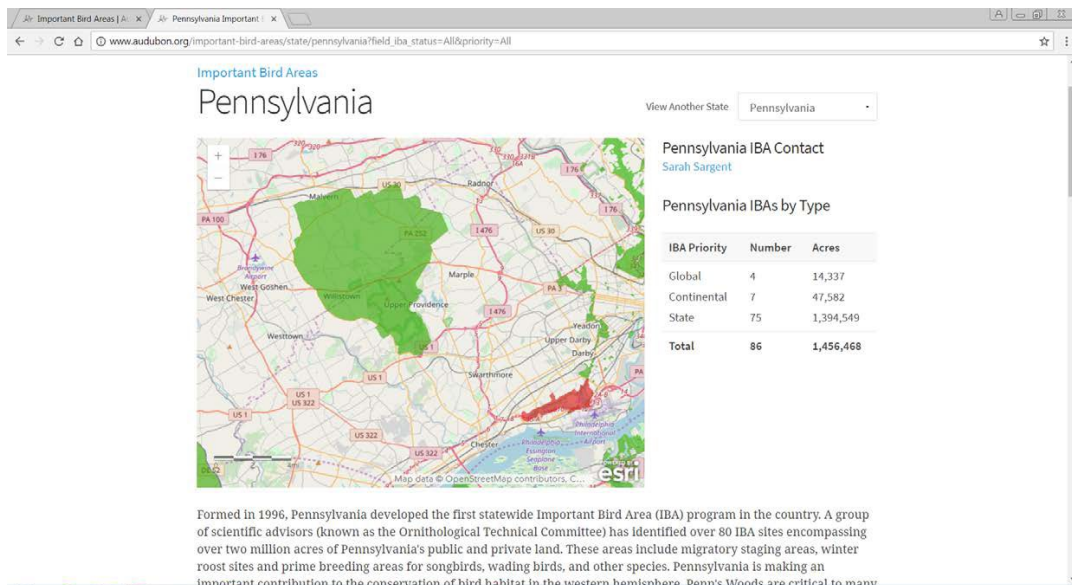
The figure above depicts an image taken from Redfin.com, overlaid with a map taken from the CRC Watersheds Association: <https://bit.ly/4fQwM1T>

Golf Club Shotgun Program: Lead Contamination Risks to Ground Water and Drinking Water in Floodplain Feeding the Crum Creek Watershed

Waynesborough Country Club's trapshooting range is not only located in the midst of a downward-sloping floodplain feeding the Crum Creek Watershed, but also in the middle of one of the National Audubon Society's designated '**Important Bird Areas**.'

National Audubon Society - Important Bird Areas:

<https://gis.audubon.org/portal/apps/dashboards/1742bc47f980490da9c23e23dc4d5e86#state=Pennsylvania>:



Explore Important Bird Areas

