

October 3, 2025

JAKE RIED
NEIGHBORHOOD BUILDERS LLC
6205 MILLS CIVIC PKWY STE 200
WEST DES MOINES IA 50266

BRENT GREGUREK
THE NEW PIONEER GUN CLUB
31454 312TH PL
WAUKEE IA 50263

**Re: The New Pioneer Gun Club (31454 312th Pl, Waukee, IA 50263)
Iowa DNR Contaminated Sites Database ID No. [2864](#)
Phase I ESA and Phase II LSI Reports – Initial Site Screening**

Dear Mr. Ried and Mr. Gregurek

The Iowa Department of Natural Resources, Solid Waste and Contaminated Sites Section (DNR) received a Phase I Environmental Site Assessment (Phase I ESA) report and a Phase II Limited Site Investigation (Phase II LSI) report for The New Pioneer Gun Club property in Waukee, Iowa on September 19, 2025. The reports were completed by Emmons & Olivier Resources, Inc.

The reports detail recognized environmental conditions at the location. The subject property has been used as a clay target shooting range for over 60 years and it is understood that lead shot is an impact associated with this activity. Two main areas of the property have likely been impacted by lead shot deposition: an area north of the present skeet/trap houses, and a broader, less well-defined area associated with sporting clays shooting.

Soil at several locations was found to contain lead above the statewide standard of 400 mg/kg. While the samples were collected from locations across the property, it is apparent that the anticipated main shotfall area for the trap and skeet range was not sampled, though it is understood that this area has had shot reclaimed in the past. It will be imperative going forward to agree on a plan for complete sampling of all areas that are likely to have lead shot. Experience at similar sites suggests that the upper few inches of soil will contain most of the shot, and sampling should be concentrated to this zone.

DNR anticipates that the area will be redeveloped for residential use, which increases the likelihood of human contact with lead-contaminated soil. In order to allow residential use of the property, it will be necessary to demonstrate 24" (minimum) of clean soil below regulatory limits.

The site information and reports have been reviewed as part of the Initial Site Screening (ISS) program. The site has been assigned a Priority 3, which means that some health-based standards are exceeded and additional work is necessary should the land-use type change. This site will automatically be included in the State Lead Program. The rules regarding this program can be found in [567 IAC 133](#). If a certificate of no further action is desired, the site can be optionally enrolled in the Land Recycling Program ([567 IAC 137](#)). Please have the party who will be responsible for future actions at the site contact DNR for more information and next steps.

If you have any questions, or if we may be of further assistance, please contact me at matthew.graesch@dnr.iowa.gov or by phone at [\(515\) 250-1923](tel:5152501923).

Sincerely,

Matthew Graesch, P.G.
Environmental Specialist Senior
Land Quality Bureau

cc: Michael Sullivan
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Pat Conrad
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