

From: Monda, Matthew J (DFW)
Sent: Wednesday, March 07, 2012 11:14 AM
To: Clear, Gwen (ECY)
Cc: Zeigler, Robert C (DFW); Ware, David A (DFW); Creekpaum, Marjorie L (DFW)
Subject: Hughes Shooting Preserve
Attachments: Ecy Comment on Hughes Shooting Preserve.pdf

Dear Ms Clear:

Thank you for your comments in the attached letter regarding the determination of nonsignificance for the establishment of a shooting preserve by Mr. Grant Hughes. Below are our responses to your comments.

Consider making the proposed shooting preserve a Nontoxic Shot Zone

Currently lead shot is legal to use for hunting upland birds on all private property and most public property in the state. The areas that require the use of nontoxic shot by WDFW are identified by **WAC 232-12-068 Nontoxic shot requirements** and went through a public review process before being acted on by our Fish and Wildlife Commission. WDFW has never required the use of nontoxic shot in issuing a shooting preserve application. We have discussed your proposal with Mr. Hughes and he is not interested in requiring nontoxic shot on his area. WDFW is moving forward to restrict the use of lead for hunting and fishing where we have the strongest indication where there are issues, such as waterfowl picking up spent shot on wetland bottoms, pheasant release sites where large numbers of hunters annually deposit large quantities of shot, and lakes with breeding loons. We have moved the boundary of the shooting preserve to ½ mile from Crumbacker Lake, this should minimize exposure to lead by waterfowl. We will forward your letter to Mr. Hughes to ensure he is aware of your recommendation. Restricting the use of lead on a shooting preserve would be controversial, is without precedence, and inconsistent with our many existing shooting preserves that do not require nontoxic shot. If broader restrictions on the use of lead shot are required by an action of our Fish and Wildlife Commission or by other laws, they would apply to existing shooting preserves.

Test soil for residual concentrations of pesticides

Not sure of the relevance for this recommendation. This is an application for a shooting preserve, this permit does not regulate ground disturbance or site development. You further recommend that “potential buyers” be notified of the soil testing results; selling this property is not part of this application or indicated in application. The SEPA checklist 8b. identifies that the past agricultural use was grazing and we are not aware of information indicating that the land had other types of agricultural use that would have used extensive pesticides.

Thank you for your comments and we will be forwarding your letter to Mr. Hughes.

Matthew J. Monda, Ph.D.

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