

From: [Gallie, Jon A \(DFW\)](#)
To: [Newschwander, Jeff \(ECY\)](#)
Cc: [Creekpaum, Marjorie L \(DFW\)](#); [Wood, Lisa \(DFW\)](#); [Volsen, David P \(DFW\)](#)
Subject: RE: Comment from Ecology on DNS 14-069 Hidden Ranch Shooting Preserve
Date: Friday, October 10, 2014 4:26:26 PM

Mr. Newschwander,

thank you for providing comments for DNS 14-069 Hidden Ranch Shooting Preserve, RE: Toxics Clean Up. In response to your request for the applicant to allow only non-toxic shot on the Shooting Preserve, we first sought to be consistent with other WDFW policies and current management of similar situations in evaluating your comments. WDFW recognizes the threats posed by lead and have implemented non-toxic shot restrictions in places that have been documented to be most hazardous to wildlife, namely wetlands and water bodies with waterfowl hunting, areas of historic concentrated upland bird hunting (pheasant release sites), and target/clay shooting sites. The harmful effects on wildlife occur after years of lead deposition in concentrated areas. Other WDFW managed lands that do not fall into these categories; where there is regular, but not concentrated upland bird hunting, are open for lead shot use.

In an effort to be consistent with the above criteria, we examined how the proposed shooting preserve might fit. First, the sloping topography on this site prevents water accumulation during the spring, and is thus not suitable waterfowl, shorebird, or wading bird foraging habitat; which fails to meet one of the criteria for non-toxic shot. There are no plans for target/clay shooting, another suggested non-toxic shot criteria. This area will be used for pheasant/chukar partridge releases and will develop concentrated hunting activity, which does suggest a need for non-toxic shot. However there is one key factor on this property that should be considered is that it has always been in private ownership, not open to hunting and currently would likely have no detectable lead presence. This is in contrast to our WDFW managed lands used for pheasant releases, where there has been decades of public hunting in addition to the concentrated shooting activity surrounding the pheasant release to produce the current lead build up and contamination.

Neither WDFW nor Hidden Ranch Outfitters wants future lead build up, so we are proposing a mitigation plan that should satisfy your concerns. First, the applicant will routinely spread hunting clients and bird release across the 950 acres as to not concentrate hunting activity. Second, given the lack of current lead presence on site, we feel that there is not an immediate concern for toxic buildup and subsequent effects on wildlife, so the applicant will advise clients to use non-toxic shot, providing time to educate clients on the issue, but not require non-toxic shot for a period of three complete hunting seasons (Sept-May) after permit approval. Beginning in the fourth year following permit issuance (assuming permit is issued in 2014, this would be 2018) the applicant will require all clients to use non-toxic shot. Given that the majority of clients are return hunters allows for education, and the phased approach will both satisfy the prevention of toxic lead build up, and prevent interruptions in business operations for the applicant.

WDFW feels this approach is both consistent with other WDFW programs and nationwide phase in of non-toxic shot requirements for hunting opportunities. If you have any questions, please contact me at the number below. Thanks.

Jon Gallie

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