

DNS 19-026-Wenas Wildlife Area Target Shooting Improvements and Management
 SEPA Comment Period, May 2-May 16, 2019

#	Comment	WDFW Response
1	<p>I support the development of a defined and restricted shooting area at Wenas. Judy Hallisey</p>	<p>Thank you for your comment.</p>
2	<p>Dear Ms. Wood:</p> <p>The process WDFW has facilitated over the past couple of years has been productive by informing this proposal. There has been abundant education opportunities created by the process for the public around the complexities of shooting on public lands. The very diverse advisory committee has had ample opportunity to discuss with themselves many options, and they've done a lot of compromising as they learned from each other. Throughout the planning process there has been complete transparency in decision making. The staff working so hard on this project should be recognized for the effort they put into this complex task.</p> <p>The Department of Natural Resources (DNR) provides recreation opportunities where such uses are compatible with the trust objectives. Trust Lands are publically owned and managed, but they are not public lands in the sense that we are accustomed to thinking of national parks, national forests, or many other types of public land. They are managed for clearly specified beneficiaries, principally the common schools. DNR is obligated to make the trust productive and to act with undivided loyalty to the beneficiary. There are many DNR managed lands scattered within the planning area.</p> <p>The Region was represented at nearly all of the meetings where development of these actions took place. The improvements will reduce impacts to DNR trust lands due to better controls provided by all the actions. It is the Region's belief that the proposed actions are the safest possible early actions that can be taken to address the many shooting topics the advisory committee has worked on. The Phase 2 actions that are mentioned under Action 1 will need more consideration from a safety and environmental stand point. Additionally, Phase two is where DNR will need to coordinate more directly as the footprint of actions will spread to DNR managed lands within the wildlife area.</p> <p>Thank you for the opportunity to participate in this planning process and to comment on the SEPA. Southeast Region supports the implementation of the four actions listed in this proposal. They will provide a safer, more sustainable experience for shooters on the Wenas Wildlife Area. We look forward to more conversations around this topic and other adaptations to recreational use in the future on our mixed ownership.</p> <p>Sincerely,</p>  <p>Larry Leach</p>	<p>Thank you for the response, we look forward to continuing to coordinate with DNR as this project is implemented, especially as opportunities for longer distance target shooting are developed which will directly impact trust lands.</p>
3	<p>This project should not go forward until the ground at the shooting range is tested for lead contamination. The shooting range has been in existence for over 40 years and has never been tested due to the objections of WDFW staff. Their conclusion is that the "blocking" caliche soil prevents lead from penetrating and poisoning the shooting range with lead contamination. That theory should be tested. Until the testing is done through a certified agency, nothing should go forward on this project Ed Shoenbach</p>	<p>Lead management is addressed in the SEPA checklist, WDFW is not removing any materials from the site and is taking efforts to contain any lead existing or added to the site from mobilizing and leaving the project area. The site will be monitored and lead accumulation will be reclaimed as needed.</p>

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4	<p>Dear sirs,</p> <p>The subject discussion seems consistent with the written proposals generated by the Target Shooting Committee as well as subsequent involvement of the committee with DFW officials. The report is silent on the subject of dedicated and dependent funding as well as a provisional timetable for implementation.</p> <p>Regards, Steve Miller, Target Committee member</p>	<p>Thank you for your comment, current funding is limited to the proposed phase 1 improvements, additional funding will be needed for phase 2 work and long term maintenance.</p> <p>Implementation of phase 1 work is expected in 2019.</p>
5	<p>The WDFW Region 3 (WDFWR3) proposal is typically inadequate approach by government to an opportunity to provide community with a long term solution to an issue they themselves have brought to the front.</p> <p>In May of 2017 WDFWR3 seated the Wenas Target Shooting Committee which met through December of 2017.</p> <p>At the outset WDFWR3 seated the TSC to address four (4) concerns;</p> <p style="padding-left: 40px;">1.Safety 2. Habitat 3. Trash 4. Fire</p> <p>In the later months of the Target Shooting Committee (TSC) meetings while the committee was discussion shooting options for the Buffalo Road (BR) site, WDFW Program Manager McCorquodale (PMM) stated, quote; “if it were up to me there would be no shooting at Buffalo Road”.</p> <p>The plan set forth by WDFWR3 in the SEPA fails to adequately meet the recommendations as set forth by the TSC.</p> <p>Clearly insufficient funding is being used as the driving reason behind the plan. This is poor excuse for what is in truth poor management. Washington State Recreation and Conservation Office in 2017 had on its web site posted there was at that time available \$580,000 for Firearm and Archery Range Recreation. WDFW R3 has known since 2017 that funding was necessary to achieve the recommendations. Had R3 leadership been proactive in seeking funding from all sources including grants from National Rifle Association, The National Shooting Sports Foundation and other available groups?, there is little doubt adequate funding would have been found.</p> <p>Why did WDFRR3 not apply for such grants? State government would not have wanted to found publicly aligning themselves with any PRO FIREARM organization</p>	<p>Several of the commenter’s comments have been received before and direct responses have been previously provided. Several of the comments to this SEPA review are personal conjecture and others are inaccurate.</p> <p>Recommendations from the Wenas Target Shooting Advisory Committee (WTSAC) that substantively addressed the 4 principal concerns (safety, habitat conservation, litter reduction, and fire risk) have generally moved forward within limits of budget, agency policy, and applicable law.</p> <p>The WTSAC role was advisory, not decision-making. The commenter has mischaracterized some outcomes of the WTSAC process. For example, there was no consensus in the report regarding a shotgun range at Sheep Company Road.</p> <p>Additional funding was sought to support this project for the 19-21 biennium, but was not secured. This project will continue to be a priority for the region and all potential</p>

<p>.Simply because state government is ANTI FIREARM and is grudgingly accommodating the shooting public with what WDFWR3 believes is all that is necessary to appease this moment in politics.</p> <p>WDFWR3 has successfully used the lack of finale agreement for shooting activities at BR as the reason for what will be later in time be judged as, from its inception, a failed plan that has missed opportunity to address the concerns brought forth by WDFWR3 applying the recommendations made by the TSC.</p> <p>The TSC was manipulated by WDFWR3 staff in such a way as to purposely not enable the TSC the ability to reach consensus for target shooting at Buffalo Road. This lack of consensus is foundational to the plan set forth in the SEPA.</p> <p>The TSC recommended there only be discharge of Shotguns at Buffalo Road and a location for the activity was recommended.</p> <p>Development of a shotgun only range does appear to be in the plan. However the plan purposely lacks definitive description for the location of the range and lacks definition for what level of development will be provided. Moreover the development is intended to be last on the list of areas to be enhanced. Instead, this site should be the first to be developed at the Selah end of the Wenas.</p> <p>The reason for BR development being last is in the opinion of this observer, is that WDFWR3 has no intention of developing a Shotgun range or any other range at Buffalo Road. Rather the plan is to first enhance the site at Sheep Company Road (SCR) which, includes an accommodation for shotgun.</p> <p>This is directly opposed to the TSC recommendation that there be NO shotgun shooting at SCR.</p> <p>Please realize the underlying the reason for the failure to apply the TSC recommendation is the statement made by PMM that there be no shooting at BR.</p> <p>The planed enhancement at SCR includes a token shotgun stand at the Southeastern corner of the site.</p>	<p>funding sources will be evaluated.</p> <p>Thank you for the constructive comment on the shotgun range orientation at Sheep Company Road. If possible, the orientation will be adjusted to maximize use.</p> <p>As described in the SEPA, the Buffalo Road proposal is based on information in the WTSAC report and over a year of additional coordination with the committee.</p> <p>Lead management is addressed in the SEPA checklist. Existing soils that may contain lead will not be removed from the property. Going forward lead accumulations will be monitored and will be reclaimed as needed. All contracts would go through a competitive bid process.</p> <p>Thank you for your comment on range design and layout. The design has been reviewed by internal and external experts as well as the WTSAC. The project will continue to move forward as proposed.</p>
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<p>One would think that driving enhancements of any type at any of the chosen site would be to offer to the public a site that they would want to use.</p> <p>The location for a shotgun position pointing SE is one of the least desirable positions for a sport that requires a participant to look skyward into the sun. Common sense would tell anyone that the location for the range would best be located looking north or at minimum northeasterly.</p> <p>Participants will recognize the location chosen will diminish time of day available for its use and diminish the number of participants. So when and where will they go? Elsewhere on the Wenas Wildlife Area in direct opposition to the intent of the enhancements</p> <p>To this observer WDFWR3 intends to placate shotgun shooters in the hope that enhancement at BR will be unnecessary. Again consider PMM statement.</p> <p>In reality there should be NO SHOTGUN SITE at SCR as recommended by the TSC. WHY NOT?</p> <p>Visit The Pomona Gun Club located in Yakima County on State Route 821 north of Selah. This group is over 50 years in operation. It is a best example of a safe shooting range.</p> <p>First of all shotgun is commonly placed apart from hand gun or long gun because discharge of shotguns is technically demanding, demanding in ways that are being totally disregarded by WDFW R3.</p> <p>If WDFWR3 seriously desired long term solutions addressing the four (4) concerns as were brought forth, SCR would be seen as an opportunity rather than as a an undesirable conclusion for something an ANTI GUN state government agency is attempting to force down the throats of the tax paying public they are responsible to accommodate.</p> <p>These enhancements at the locations outlined in the SEPA are intended to attract shooters to the locations thereby diminishing the need or the desire to go elsewhere on the Wenas to discharge firearms.</p> <p>The plan as set forth may be a temporary solution but is not a long term fix. As a result WDFWR3 will have spent time and funding, inadequately enhancing these sites which in</p>	
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<p>the end do NOT provide a long term solution to the very reasons the TSC was seated.</p> <p>If developed as presented WDFWR3 has in the plan a discussion regarding lead. There is acknowledgement of the current existence of lead. There is discussion of later management of lead deposited after enhancements are made.</p> <p>Environmentally I can agree with WDFWR3 SEPA approach to the lead. There is not threat to the public by lead being at these locations.</p> <p>However there is not discussion for why there is no plan to address removal of existing lead. Considering the lack of funding and considering the value of reclaimed lead?</p> <p>Consider throughout the country the emphasis placed on proper management of lead including professional commercial reclamation of this valuable commodity.</p> <p>The current volume of lead at SCR must huge. Consider; you do the math.</p> <p>A single 150 grain projectile is in common use for center fire rifle and hand guns. One (1) 150 grain projectile = approximately 1/3 of an ounce of lead.</p> <p>Three (3) such projectiles = One ounce of lead. The SCR site became public lands in 1968.</p> <p>Now 50 years later, if the site averaged 5 shooters per day (many more in reality), each shooter discharging 20 rounds of ammunition, each projectile weighing 150 grains (1/3.) X 365 days, X 50 years, how many tons of lead may be laying just under the ground and on top of the ground at SCR ???</p> <p>This equation does not consider the additional volume of lead laid down by shotgun shooters over these same years, nor does it consider the enormous volume of small caliber ammunition (.22 caliber) discharged by adults or parents and grandparents training young shooters.</p> <p>Combined it must be recognized there is an enormous volume of lead at SCR and WDFW R3 is disregarding the opportunity to harvest this recoverable reusable commodity for the value it represents.</p>	
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	<p>The Plan set forth disregards a growing population, both in the Ellensburg area and the Selah area of the Wenas Wildlife area.</p> <p>The recommendations made by the TSC recognized and included this fact when making the recommendations for the locations and arrangement of shooting disciplines at SCR and Durr Road. These recommendations were supported by George Holman (US Army Range Design Expert). WDFWR3 is attempting to proceed disregarding these recommendations.</p> <p>As such the plan set forth in the SEPA may initially and limitedly resolve a portion of the four (4) concerns brought forth by WDFWR3. However in a relatively short time will prove, on their own, to have been ill-conceived and thought though poorly.</p> <p>It is recommended there be a formal review by the proper agencies and range design experts to reconsider the plan as set forth.</p> <p>That the plan be put it on hold until WDFWR3 complies with the recommendations of the TSC.</p> <p>James Lydigsen Past member 2017 TSC</p>	
6	<p>In my opinion the WDFW DNS is appropriate, particularly inasmuch as the proposed improvements will far more likely than not both improve public safety due to the addition of backstops and side berms in heavily used target shooting areas both for shooters and for the general public using the Wildlife Area and residents adjacent to the Wildlife Area.</p> <p>The improvements will also (if constructed appropriately) limit environmental movement of lead away from projectile impact areas and facilitate management (periodic removal) of lead from backstops compared to current use practices.</p> <p>In my opinion compacted crushed rock of either quarry spill underlayment/base or ¾" minus or larger surface installation is more permeable than the fractured basalt/clay soil at the site(s).</p>	<p>Thank you for the comments. WDFW will monitor the site and follow Dept of Ecology requirements.</p>

	<p>While there will likely be some minor movement of lead (associated with adsorption to soil fines) primarily due to wind erosion and/or fugitive dust when shooting occurs in future use, it will most likely be limited to 75 feet or so (see remediation report for the Snohomish County Sheriff's Range at Payne Field, accessible through the Department of Ecology ISIS (Integrated Site Information System) for background. This report will give insight into likely current and/or future impacts at these sites.</p> <div style="background-color: #e0e0e0; padding: 10px; margin: 10px 0;"> <table style="width: 100%; border: none;"> <tr> <td style="width: 20%;"></td> <td style="width: 20%; text-align: center;">Paine Field Pistol Range Cleanup, Paine Field Sheriff Pistol Range</td> <td style="width: 20%; text-align: center;">3220 100TH ST SW</td> <td style="width: 40%;"></td> </tr> </table> </div> <p>7.a.5. of the SEPA checklist should also address lead contamination (if found to be present above MTCA (Ch. 70.105D RCW, WAC 173-340, i.e. comprising a "hazardous substance, in the Worker Health and Safety Plan for construction.</p> <p>If lead (Pb), antimony (Sb) or arsenic (As) are found above MTCA standards (see above comment), the location should be reported to Ecology and an Interim Action Plan should be developed for such contaminated areas to contain or otherwise safeguard or use contamination within the zone of contamination (to avoid waste generation).</p> <p>If you have any questions about these comments, please feel free to contact me.</p> <p>Sincerely, Norm Peck</p>		Paine Field Pistol Range Cleanup, Paine Field Sheriff Pistol Range	3220 100TH ST SW		
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7	<p>It would seem to make more sense to keep all of the shooting in one area. Since Buffalo Rd is a popular area for hikers and horses, having a shooting area there would have a negative impact on those activities. From experience I have found that the majority of the people shooting are not conscious of others in the vicinity. I have have had some bad experiences where people were not respectful of horses and</p>	<p>Thank you for the comment. The proposal seeks to balance the variety of recreation use in the Buffalo Road Area. A shot gun only area at a designated location is appropriate and will provide opportunity for a</p>				

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	people passing by. Having all of the firearms in one area would leave other areas available for use by those that are not shooting. Kelly Neilson	segment of the community while limiting impacts to other users and surrounding private property owners.
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