

DNS 20-028 Rule Revision for Recreational Target Shooting

SEPA and Rulemaking comment responses – Comment Period: January 25 to June 10, 2020

Rule Section	Public Comments*	WDFW Discussion	Recommended Adjustments
General Restrictions	The opening section of the proposed rule update is too open ended and could lead to unwarranted closures without warning.	It is WDFW's intention to communicate with the public in advance of any proposed closure.	none at this time
	One of the stated goals of the proposed rule update was to reduce confusion by aligning with Washington DNR target shooting rule (WAC 332-52-145). WDFW should just adopt WAC 332-52-145.	WDFW based its proposed update on WAC 332-52-145 and supplemented it to provide additional guidance. WDFW will continue interagency discussions with DNR about updating WAC 332-52-145 to reflect this proposed update to WAC 220-500-140.	none at this time
	Education (not regulation) should be a focus for improving safety and reducing impacts from target shooting. Educate, educate, educate!	WDFW agrees that education is important. We will continue to encourage users to wear orange during hunting seasons, publish information in multiple languages about target shooting rules and locations, and do education/outreach before enactment of the proposed rule update.	none at this time
Where shooting is allowed and prohibited	Language restricting shooting by roads is vague. WDFW should allow shooting on or along old roads not used for vehicles.	Some roads not used for vehicles are used for other recreation, e.g. hiking, biking, equestrian. WDFW can restrict shooting on these roads as needed to protect other users. WDFW should reduce ambiguity by linking to the definition of a road in WAC 220-500-020.	"(e) Recreational target shooting is specifically prohibited:(i) On, from, at, along, across, or down: (B) Any road as defined in WAC 220.500.020."
	Restricting target shooting is a violation of constitutional rights. Allow unrestricted shooting everywhere.	Recurrent issues related to safety, littering and other habitat damage indicate the need for rules restricting target shooting. Restricting	none at this time

		target shooting is allowed under statute.	
	There is no ricochet danger from shooting over dry water bodies. Allow shooting over/near dry (seasonal) water bodies.	When seasonal water bodies refill with water, expended ammunition increases risk of habitat impacts.	none at this time
	There is limited wildfire danger west of the Cascade Mountains or places with limited vegetation. Allow summer shooting on westside and where no vegetation.	Wildfire danger from target shooting increases across the State during the summer.	none at this time
	Dispersed target shooting doesn't serve the majority of WA residents, poses a safety risk, ruins outdoor experiences for other users, and is contrary to WDFW mission to conserve species and habitat. Also, there is not enough enforcement capacity to cover dispersed shooting. Ban all shooting on WDFW managed lands or restrict target shooting to designated ranges.	Restricting target shooting to ranges will not meet user needs at a time when there are limited designated areas or ranges.	none at this time
	A backstop is a reasonable requirement for ALL recreational target shooting. Require a backstop for all shooting.	All shooting is restricted by rule requirement 3 (a): "...only permitted where a reasonable person...would believe the area between the person and the target, and the area beyond the target, is free of risk to person, animals, or property." The limited range of archery, air rifles (<800 fps), slinghots puts the "danger zone" within	none at this time

		close proximity of shooter, allowing shooter to be well aware of any risk to nearby persons, animals or property. Skeet and trap shooting cannot feasibly be done against a backstop.	
Prohibited Ammunition	These is a low risk of wildfire from steel core ammunition and it is difficult to find 5.56 NATO ammunition that is not steel core. Allow steel core ammunition.	Banning steel core ammunition could push higher lead ammunition usage. Wildfire danger is mitigated by emergency fire restrictions. Should allow steel core bullets outside of emergency fire restrictions unless otherwise restricted.	"(5) The discharge of tracer bullets or shells, or incendiary ammunition, or steel core bullets, is specifically prohibited on all department lands."
	Lead ammunition is toxic to people and wildlife. WDFW doesn't do lead recovery. Add ban on all lead ammunition from WDFW-managed lands.	Early in the process, it became clear that addressing the issue of lead/toxic ammunition in this rulemaking would be a major stumbling block to its adoption when also need to address public safety and other habitat issues, e.g. litter and wildfire danger. Decision made not to address ammunition toxicity in this rulemaking.	none at this time
	Archery and air gun use is not dangerous. Remove all restrictions on these implements.	The proposed rule update includes very minimal restrictions on archery. The restriction on air guns is based on velocity of projectiles that are comparable to traditional firearms and therefore reasonable.	none at this time
Allowable Targets	Steel targets do not create a fire danger unless shot with steel. They are also reusable, which could mean less waste/litter. Allow steel targets year round.	Fire risk and ricochet risk remain a concern with steel targets.	none at this time

Prohibited Targets	Binary explosive targets offer a fun and unique recreation experience. Allow binary exploding targets.	Exploding targets create high a risk of wildfire and are not allowed in the existing rule. Also not allowed on many public lands..	none at this time
	Other targets are inexpensive and safe, including wood pallets, tree stumps, plastic jugs of water, aluminum cans, old yard signs, biodegradable targets (e.g. pumpkin). Allow alternative targets.	It is almost universally accepted (based on comments) that litter resulting from target shooting is an issue on WDFW-managed lands. Limiting the types of allowable targets is intended to reduce the litter impact of target shooting.	none at this time
When target shooting is allowed	Shooting in the dark is unsafe. Restrict shooting to daylight hours.	The proposed rule update allows shooting 1/2 hour before sunrise and 1/2 hour after sundown, which is consistent with hunting rules.	none at this time
Litter	Litter is a big problem associated with target shooting. WDFW should provide dumpsters to facilitate clean up.	Providing dumpsters would encourage dumping unrelated to target shooting.	none at this time
	Increase penalties for littering.	The proposed rule update does not set penalties.	none at this time
	Increase enforcement for littering.	The proposed rule update does not set enforcement priorities.	none at this time
	WDFW should organize volunteer clean up events.	The proposed rule update does not set volunteer program priorities.	none at this time

*WDFW received more than 1,300 public comments. Comments have been summarized and in some places combined for the readability of this document.