



NRA-ILA

NATIONAL RIFLE ASSOCIATION OF AMERICA
INSTITUTE FOR LEGISLATIVE ACTION
11250 WAPLES MILL ROAD
FAIRFAX, VIRGINIA 22030-7400

May 23, 2007

WDFW Commission Members
600 Capitol Way North
Olympia, WA 98501-1091

Dear Commission Members:

On behalf of the National Rifle Associate (NRA), I am submitting public comments regarding the proposed rules that constitute the New WAC Chapter 232-13. The NRA has thousands of members in Washington State who will be affected by the proposed rules.

The NRA appreciates WDFW's clear commitment to our hunting heritage on lands it controls. This is made evident by its recognition that hunting is a "primary purpose" for the public use of department-controlled lands. Of course, hunting is a critical tool in the effort to manage and conserve game animals and habitat.

Recreational shooting opportunities on public lands and effective hunting go hand-in-hand. In order to ensure safe and humane harvests of game animals, hunters need to be able to practice their shooting skills in real-world settings and have convenient places to zero their rifles before hunting.

The proposed rules contemplate the curtailment of recreational shooting on department-controlled lands. This is of great concern to NRA and its members. In the "reasons supporting proposal" section of the Department's document, there is mention of "activities...inconsistent with fish and wildlife management goals." The suggestion is that recreational shooting is somehow one of these inconsistent activities. As already mentioned, the NRA contends that recreational shooting and the associated enhancement of marksmanship skills is perfectly consistent with wildlife management goals in that they enhance hunter safety and efficiency.

The Department's document also mentions "activities [that] prevent others from enjoying fish and wildlife recreational opportunities." Recreational shooters have an outstanding safety record and shooting on public lands is a time-honored tradition. The NRA requests that the Department not restrict recreational shooting opportunities because other public land users are able to hear distant shooting that is being conducted in a safe and responsible manner.

Specifically regarding the new proposed rule affecting recreational shooting in WAC 232-13-110, the NRA requests the elimination of subparagraph (1)(b) and paragraph (2) and a modification to subparagraph (1)(c) to insert a “good faith effort” or “due diligence” standard. All responsible recreational shooters endeavor to leave their shooting site in the same or even better condition than when they arrived. However, it is sometimes impossible to account for every single shell casing or small piece of target paper dislodged from a target while shooting. The strict liability standard that is proposed might have unintended consequences of having a chilling effect on recreational shooting or penalizing truly conscientious shooters who do their level best to clean their shooting location.

Regarding subparagraph (1)(d), the NRA requests that “cans” be eliminated from the list of prohibited targets. Unlike glass bottles, for instance, the “plinking” of aluminum cans is a responsible, age-old tradition that allows for easy retrieval of the targets when shooting is completed. The recreational shooter using cans as targets would still be subject to the “clean-up” requirement proposed in subparagraph (1)(c).

Recreational shooting is a safe, time-honored activity on department-controlled lands that is consistent with the Department’s wildlife management goals. Because of this, recreational shooting should be protected and encouraged on these public lands.

Sincerely,

A handwritten signature in black ink, appearing to read "Darren LaSorte". The signature is fluid and cursive, with the first name being the most prominent.

Darren LaSorte
NRA-ILA
Manager of Hunting Policy