

Lassen County Fish and Game Commission

707 Nevada Street
Susanville, CA 96130

June 19, 2014

California Department of Fish & Wildlife
Attn: Non – Lead Implementation
1812 9th Street
Sacramento, CA 95811

To Whom It May Concern:

The Lassen County Fish & Game Commission has reviewed your implementation schedule for Fish and Game Code Section 3004.5(i). Our review has resulted in five points which we feel should be addressed to make this process more transparent and reflect necessary leadership during the implementation process.

1. Most importantly, we request the California Department of Fish & Wildlife hold a public meeting in Susanville before July 1, 2015. Implementation of non-lead hunting within Lassen County will not just impact recreation opportunities but a way of life for many of our residents. It is imperative that Lassen County residents have an opportunity to express their concerns and potential support in person at a public meeting. We recommend the meeting be held in Jensen Hall on the Lassen County Fairgrounds. The telephone number for the Lassen County Fair office is (530) 251-8900.
2. California Department of Fish & Wildlife (Department) and the California Fish & Game Commission (Commission) should use non-lead implementation as an opportunity for California to not only lead the nation in the use of non-lead ammunition but the manufacturing of non-lead ammunition. This could be accomplished by both the Department and Commission working with ammunition manufacturers inside the state as well as out of state manufacturers to increase the volume and selection of non-lead ammunition. Currently the most needed non-lead ammunition are 22 rimfire, 17 caliber, upland game non-lead shot sizes, and musket balls. There are many more calibers of rifle and handgun ammunition needed in non-lead. The list of these are attached. Failure to take the lead in this issue reflects a lack of respect and support for California's hunters.
3. The Department should be working with the Bureau of Alcohol Tobacco and Firearms (BATF) to determine if current non-lead ammunition is or is not considered armor piercing. This dialogue should go further to complete a definitive definition of armor piercing ammunition. Without this

definition it is impossible to determine if the Governor's exemption is needed before implementation begins.

4. The Department needs to expand the implementation perspective and document interim actions between target dates. These can be placed on the Department's website.
5. There is be no legitimate need to require certification of handloaders.

We look forward to helping you with the public meeting in Susanville and seeing your response to our recommendations.

Thank you for your consideration of this matter.

Sincerely,

Donald J. Armentrout, Chairman
Lassen County Fish and Game Commission

Cc: Lassen County Board of Supervisors
California Fish & Game Commission
Assemblyman Brian Dahle

**LIST OF UNDERREPRESENTED CALIBERS
FOR NON-LEAD AMMUNITION**

RIFLE

17 Hornet	223 Winchester Super Short Magnum
17 Mach IV	22-6mm
17 Remington Fireball	5.6x52mm (22 Savage High Power)
17 Remington	6x47mm
20 Tactical	6mm PPC
204 Ruger	6mm Benchrest Remington
22 Hornet	6mm-284
219 Bee	243 Winchester Super Short Magnum
221 Remington	25-20 Winchester
222 Remington	256 Winchester Magnum
22 PPC	25-35 Winchester
5.6x50mm Magnum	250-3000 Savage
219 Donaldson Wasp	257 Roberts
219 Zipper	257 Roberts Improved
225 Winchester	25-06 Remington
224 Winchester Magnum	6.5x50mm Japanese
22-250 Remington	6.5x52mm Carcano
220 Swift	6.5x54mm Manlicher-Schoenaur
5.6x57mm RWS	6.5 Grendel

6.5x55mm Swedish Mauser
260 Remington
6.5x57mm
6.5mm-284
6.5 Creedmoor
6.5mm-06
6.5mm Remington Magnum
264 Winchester Magnum
6.8mm Remington SPC
7mm-08 Remington
7x57mm Mauser
284 Winchester
280 Remington/7mm Express
Remington
7x65mm R
7x64 Breneke
7x61 Sharpe & Hart
7mm Dakota
7mm Shooting Times Westerner
30 M1 Carbine
300 Whisper/AAC Blackout
30-30 Winchester
7.5x54mm MAS
300 Savage
307 Winchester
30 Remington AR
308 Marlin Express
7.5x55mm Schmidt Rubin (7.5mm
Swiss)

7.62mm Russian
30-40 Kraig
30 TC
M1 Garand
300 H&H Magnum
300 Remington Short Action Ultra
Magnum
308 Norma Magnum
300 Winchester Short Magnum
300 Ruger Compact Magnum
300 Dakota
300 Remington Ultra Magnum
32-20- Winchester (32-20 WCF)
7.62x39mm M43
7.56x53mm Belgian Mauser
303 British
7.7x58mm Japanese
32 Winchester Special
8x57mm Mauser
8mm-06
325 Winchester Short Magnum
8x68 mm S
8mm Remington Magnum
33 Winchester
338 Marling Express
338-06
338 Ruger Compact Magnum
338 Lapua Magnum
338 Remington Ultra Magnum

348 Winchester
357 Magnum (Rifle)
35 Remington
356 Remington
358 Winchester
350 Remington Magnum
35 Whelan
358 Norma Magnum
9.3x74 R
9.3x62
38-55 Winchester
375 Winchester
376 Steyner
375 H&H Magnum
375 Ruger
375 Dakota
375 Remington Ultra Magnum
405 Winchester
450/400 Nitro Express 3"
416 Rigby
416 Ruger
416 Remington Magnum
416 Dakota
416 Barrett
404 Jeffery
44-40 Winchester (Rifle)
44 Remington Magnum (Rifle)
444 Marlin

45 Colt (Rifle)
450 Bushmaster
45-70 Government (Trap Door)
45-70 Government (1895 Marlin)
45-70 Government (Ruger #1)
450 Marlin
458 Winchester Magnum
458 Lott

HANDGUN

22 Hornet
221 Remington Fireball
222 Remington
223 Remington
22 Bench Rest Remington
6mm TCU
243 Winchester (Encore)
256 Winchester Magnum
6.5mm TCU
6.5mm JDJ
270 REN
270 Winchester (Encore)
7mm TCU
7x45mm Ingram (7mmx223 Improved)
7mm International Rimmed
7mm Bench Rest Remington
7-30 Waters
7mm IHMSA
7mm-08 Remington

7.62x25mm Takarell
30 M1 Carbine (T/C)
30-30 Winchester (T/C)
30 Herrett
309 JDJ
357 Sig
38 Special
357 Magnum
357 Remington Maximum
357 Remington Maximum (T/C)
357-44 Bain & Davis
357 Herrett
35 Remington
375 Super Magnum
375 Winchester (T/C)
375 JDJ
38-40 Winchester
41 Remington Magnum
44 Remington Magnum
445 Super Magnum
444 Marlin (T/C)
454 Casull
460 Smith & Wesson Magnum
45-70 Government (T/C Handgun)
480 Ruger
475 Linebaugh
50 Action Express
500 Smith & Wesson Magnum