

**From:** [REDACTED]  
**To:** [FGC](#)  
**Cc:** [REDACTED]  
**Subject:** Fw: Comments Re: AB711 Non-lead implementation in CA  
**Date:** Wednesday, June 04, 2014 6:10:52 PM

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In case my email was directed to the wrong address, I am forwarding it to this address, too, to be sure my concerns are considered as part of the regulation development process.

Rick Knapp

**From:** [REDACTED]  
**Sent:** Wednesday, June 04, 2014 11:54 AM  
**To:** [wildlifemgmt@wildlife.ca.gov](mailto:wildlifemgmt@wildlife.ca.gov)  
**Cc:** [REDACTED]  
**Subject:** Comments Re: AB711 Non-lead implementation in CA

I attended the “non-lead” meeting held by CDFW in Eureka on June 3, so I understand the need and intent in implementing regulations under AB 711. However, I went away from the meeting with the same concerns I went in with:

Over the last several years, hand-loaders and purchasers of ammunition have found it difficult to get what they need on a nationwide basis, much of the problem due to hoarders who think their guns and ammunition will be taken away from them. On top of this, hunters in CA will be saddled with an even more onerous problem—to have to load and purchase non-leaded ammunition or not go hunting in our State. This is going to be very problematic. Already, it is very difficult to get ammunition for calibers outside the most common, and that is for leaded bullets. If required to load or purchase lead-free rounds, the problem will be compounded exponentially. I understand we will have until 2019 before the vast majority of hunters will be faced with the regulation, so maybe we don’t need to panic now. However, if the industry does not respond to the need and demand for ammunition on a timely basis, or if issues with ATF slow down or stop development and testing of the bullets needed, we will be faced with no ammo, limited ammo, and no ammo for many calibers when implementation is scheduled.

While the legislation may force implementation of a phased-in program, the Commission needs to work on many fronts to be sure that implementation is feasible, not leaving hunters high and “dry,” or causing hunters to break the law because there are no feasible alternatives except to give up hunting in California. You cannot just say: “We have to do it by law.” Many programs in this State are delayed when implementation is not feasible. If they weren’t, we’d have a bullet train by now. And, you can’t wait until 2019 to determine its lack of feasibility. As you approach the deadline, say 2017, if substantial progress has not been made to meet the demand for bullets and ammunition, you must seek a delay or overhaul of the legislation. That should be made clear when you adopt any regulations.

You should not just put your head in the sand and hope it all works out. You must recognize reality or you will be taking a great deal of deserved and continuous criticism over the next 5 years.

Sincerely,

Rick Knapp

[REDACTED]

[REDACTED]