



# Safari Club International

A NON-PROFIT ORGANIZATION ♦ DEDICATED TO CONSERVING WILDLIFE AND PRESERVING HUNTING



## California Chapters

March 26, 2015

Mr. Jack Baylis, President  
California Fish and Game Commission  
1416 Ninth Street, Suite 1320  
Sacramento, CA 94244

Re: Agenda Item 27 for the April 8-9, 2015 Fish and Game Commission Meeting, Adoption of proposed regulations regarding authorized methods of take for wildlife using lead ammunition – phasing out the use of lead ammunition

Dear President Baylis and Members of the Commission:

Safari Club International Foundation and Safari Club International (SCI) is a worldwide organization with the purpose of promoting Conservation of our Renewable Wildlife Resources, recognizing hunting as one of the many management tools. Currently with over 55,000 members and over 5,000 members in California, Safari Club International also has 30,000 California Affiliates, 950,000 U.S. Affiliates and over 7,000,000 International Affiliates. SCI spends millions annually for Wildlife Conservation, Research and Education.

The Commission is urged to support, and the Department is urged to sponsor, follow-up legislation to AB 711 that would provide alternatives to an absolute ban on traditional ammunition.

In the meantime, the Commission is asked to include alternatives to a traditional ammunition ban during its regulatory phase in of AB 711, a process that does not have to be fully completed until July 1, 2019.

SCI supports an alternative that would require a hunter to bury, cover or otherwise make unavailable to predators or scavengers any entrails, carcasses or other remains of animals taken by the hunter unless the hunter used nonlead ammunition to take such animal.

Such a provision would provide hunters the alternative of using traditional ammunition, subject to the above restrictions and implementing regulations that would be adopted by the commission.

The research presentation by Southwick Associates, Inc., made to the Wildlife Resources Committee on the projected negative impacts of AB 711 on hunters, businesses and the Department of Fish and Wildlife, provided a chilling picture of what would likely happen if AB 711 is implemented without alternatives such as the **above described** restricted use of traditional ammunition being made available.

There is also the uncertainty of whether nonlead ammunition will actually be available to hunters, or if so, whether there will be adequate supplies in popular hunting cartridges. **At present, such is not the case.**

**SCI has analyzed the currently proposed Federal Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) armor piercing ammunition regulations and has determined that the proposed regulations would prevent the use of essentially all nonlead projectiles loaded into rifle cartridges that are popular for hunting. Most popular hunting cartridges can also be discharged in single shot pistols that are chambered for them. The proposed armor piercing exemption for rifle ammunition that can be fired in pistols, but only in single shot pistols, would never become operative. This is because most, if not all of it, can also be discharged in bolt action handguns having a magazine. Under the proposed regulations, this would void the exemption for hunting rifle cartridges.**

The State of Arizona has recognized the potential for unintended consequences of a mandatory ban on the use of traditional ammunition and has made the use of nonlead ammunition voluntary. Arizona reports good cooperation from hunters and has determined that its voluntary approach to method of take has been very successful in preventing access to lead ammunition fragments in animal remains by predators and scavengers.

SCI urges the Commission to take a well thought out and reasoned approach to implementing AB 711 over the entire length of the time period provided for this purpose by the bill, and to provide the above described alternative to a complete traditional ammunition ban during this time.

It is also urged that the commission give serious consideration to supporting the above described legislation that would provide a practical statutory alternative to an outright ban on traditional ammunition for hunting.

Supporting/sponsoring the enactment of the above described follow up legislation, which would provide a rational and effective alternative to a complete ban on traditional ammunition, would also fulfill the Governor's request in his signing message for such an approach to implementation.

Should you have any questions, please contact our legislative advocate, Kathryn Lynch, at (916) 443-0202 or [lynch@lynchlobby.com](mailto:lynch@lynchlobby.com).

Sincerely yours,



Lisa McNamee  
Co-Legislative Coordinator  
California Chapters



Don Giottonini  
Co-Legislative Coordinator  
California Chapters

cc: Mr. Sonke Mastrup, Executive Director, Fish and Game Commission  
Mr. Charlton Bonham, Director, California Department of Fish and Wildlife  
California Fish and Game Commission  
Governor Edmund G. Brown, Jr.  
Ms. Kathryn Lynch, Legislative Advocate  
Safari Club International California Chapters