

Boone & Crockett Club * Campfire Club of America * Catch a Dream Foundation * Congressional Sportsmen's Foundation * Conservation Force * Delta Waterfowl * Ducks Unlimited * Masters of Foxhounds Foundation * Mule Deer Foundation * National Rifle Association * National Shooting Sports Foundation * National Trappers Association * National Wild Turkey Federation * North American Bear Foundation * Pope & Young Club * Quality Deer Management Association * Rocky Mountain Elk Foundation * Ruffed Grouse Society * Safari Club International * U.S. Sportsmen's Alliance * Whittails Unlimited * Wild Sheep Foundation * Wildlife Management Institute * Wildlife Forever

June 4, 2013

The Honorable Fran Pavley, Chair
Senate Natural Resources Committee
California State Senate
State Capitol
Sacramento, CA 95814

Dear Senator Pavley and Committee Members,

Our organizations, which represent millions of sportsmen that actively support wildlife conservation and the preservation and enhancement of our nation's hunting and recreational shooting heritage, are writing to express our strong and united opposition to *AB711: An Act to Amend Section 3004.5 of the Fish and Game Code, Relating to Hunting*. Recently passed by the California Assembly, this legislation would make California the first state to ban the use of traditional ammunition for hunting. If enacted, *AB711* would be devastating to the thousands of Californians that participate in hunting and recreational shooting, the firearms and ammunition industries as well as the vital conservation programs they fund.

AB711 would also result in massive increases in the price of ammunition due to the exponentially higher raw materials and manufacturing costs of using alternative metals such as copper or bronze. The higher costs associated with non-traditional ammunition will not only price everyday consumers out of the market, it will also have untold detrimental impacts on countless manufacturing facilities resulting in the estimated loss of more than 2500 jobs and \$132 million in wages.

In addition, supporters of *AB711* fail to acknowledge how this legislation will result in considerable reductions in federal monies from the excise taxes the firearms and ammunition industries pay on their products as a means of funding habitat conservation throughout the country. In fact, much of our country's wildlife and habitat exist solely as the result of these contributions. Shooting sports participants and manufacturers are the largest financial supporters of wildlife conservation throughout the United States having contributed over \$5.4 billion to habitat conservation, recreational shooting and wildlife management through Pittman-Robertson

excise tax payments since 1991. This year alone California received more than \$14 million from these excise taxes for wildlife conservation and restoration

Moreover, *AB711* would create a de facto ban on hunting due to impediments on the production and sale of alternative ammunition which stem from the Law Enforcement Officers Protection Act (*P.L. 99-408*). Although the Act was intended to exempt ammunition designed for rifle use, its implementation has resulted in hunting ammunition being scrutinized as potentially being “armor piercing” under the statute. In recent years, a number of manufacturers have been working to develop and market new and innovative materials to replace traditional lead components in certain markets. However, many of these alternative materials cause the ammunition to fail the composition test set forth in 18 USC 921 (17) (B) (i), which subject the products to a ruling on their intended use by the Bureau of Alcohol, Tobacco, Firearms and Explosives (BATFE).

As a result, at least 19 companies that produce ammunition for hunting or other shooting sports have submitted petitions to BATFE, requesting the agency to exempt their products as “primarily intended for a sporting purpose” as required under the statute. Unfortunately, the BATFE has given little indication as to when, if ever, they will process these petitions. Until BATFE begins to approve these petitions, *AB711* will result in banning a great deal of hunting in California.

This reduction in hunting opportunities would serve as a significant threat to the many economic benefits that sportsmen and women currently generate in California. For example, in 2011, the 394,471 California hunters alone paid nearly \$153.3 million in state and local taxes and employed 20,640 people that paid more than \$758 million in salaries and wages. Further, hunters were responsible for over \$1.1 billion in retail sales which had a multiplier effect of nearly \$2.17 billion. *AB711* would threaten all of these astounding totals to the severe detriment of the state's economy.

Anti-hunting interests assert that this legislation is necessary to address impacts to wildlife populations that are resulting from traditional ammunition. This assertion lacks a credible scientific foundation in the vast majority of cases. It is our sincere hope that the upcoming consideration of this legislation will be informed by the utilization of readily available, objective data. We believe that consideration of this data will, at a minimum, convince a majority of Senators that *AB711* is vastly overbroad.

A statewide ban on traditional ammunition at this time will devastate California's hunters and recreational shooting men and women to the detriment of the economy and wildlife conservation. In addition, banning this standard equipment would result in the loss of jobs and a significant reduction in conservation funding. For these reasons, the undersigned organizations respectfully request that you continue to work collectively to defeat *AB711* which will serve to the betterment of current and future generations of California hunters and conservationists.

Thank you for your consideration of this request.

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Boone & Crockett Club

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Campfire Club of America

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Catch a Dream Foundation

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cc: Ms. Martha Guzman-Aceves, Deputy Legislative Secretary, Governor's Office
Ms. Katharine Moore, Consultant, Senate Natural Resources and Water Committee
Mr. Steve McCarthy, Policy Consultant, Senate Republican Caucus
California State Senate
Department of Finance