



March 27, 2019

The Honorable Nancy Skinner, Chair
 Senate Public Safety Committee
 State Capitol, Room 2031
 Sacramento, CA 95814

RE: SB 220 (Hill) – Firearms Dealers: Storage and Security - OPPOSE

Dear Senator Skinner:

The below listed wildlife conservation organizations strongly urge you to oppose SB 220 (Hill) – legislation which would place unreasonable additional requirements on California’s firearms dealers. Not only are these additional security requirements unnecessary, they will have an unjust impact on small business dealers statewide, and an especially detrimental impact on small rural communities.

California already places some of the strictest firearms security requirements in the nation on our firearms dealers. Existing state law already requires firearms dealers to store their inventory in a “secure facility” which, as defined, includes numerous security precautions – all of which must be satisfied. In response to a few isolated incidents, SB 220 would impose costly additional security requirements statewide. Although some larger firearms dealers may be able to absorb these costs, SB 220 would have a devastating financial impact on most smaller dealers – driving many of them out of business.

This legislation would also impact firearms dealers in other unreasonable ways. SB 220 would require street level dealers to place costly security barriers in front of their stores that, in many cases, would not comply with local codes. In addition, in the cases where store locations are leased, store owners would have to obtain landlord permission to make the changes.

Further, many of California’s rural communities depend upon hunters and anglers – and their patronage of their local sporting goods store – for much of their economic stimulus. These communities are too small to accommodate large firearms dealers that could absorb the additional costs of doing business brought on by SB 220. Because many of these local sporting goods stores will be forced out of business by SB 220, this legislation will have an unfair impact on California’s rural communities.

Additionally, SB 220 would go into effect July 1, 2020, with the extremely short period allowed for adhering to the new requirements further increasing costs and making timely compliance virtually impossible.

Finally, in 2017, Governor Jerry Brown vetoed SB 464, similar legislation by Senator Hill. In his veto message, the Governor wisely stated “This bill would require additional security enhancements on the premises of all licensed firearms dealers in California. State law already requires that firearms dealers enact security measures to avoid theft. Local jurisdictions can-and have-gone further by adding additional specific requirements. I believe local authorities are in the best position to determine what, if any additional measures are needed in their jurisdictions.”

The undersigned organizations certainly support making California a safer place by keeping guns out of the hands of criminals. But the additional requirements placed on firearms dealers by SB 220 would not accomplish that goal. SB 220 is attempting to address isolated incidents with statewide requirements that would place unreasonable and unnecessary additional requirements on all firearms dealers, and unfairly impact small dealers and rural communities.

For all the above reasons, we respectfully urge you to oppose SB 220 when the proposal comes before your Senate Public Safety Committee on Tuesday, April 2nd.

Sincerely,

Kyle Weaver, President and CEO
Rocky Mountain Elk Foundation

Mark Hennelly, V.P. of Government Affairs
California Waterfowl Association

Lori Jacobs, President
California Houndsmen for Conservation

Gary F. Brennan, President
San Diego County Wildlife Federation

Fred Harpster, President
The Black Brant Group

Dennis Slater, President
Tulare Basin Wetlands Association

Aoibheann Cline, Western States Coordinator
Congressional Sportsmen's Foundation

Donn Walgamuth, President
California Deer Association

Don Kirby, President
Cal-Ore Wetland and Waterfowl Council

Chriss Bowles, President
California Bowmen Hunters/State Archery Association

Darryl Williams, President
California Chapter – Wild Sheep Foundation

Rick Travis, Executive Director
California Rifle and Pistol Association

Cathie Nelson, President
San Francisco Bay Area Chapter – Safari Club International

Dawnita Harwood, President
California State Chapter – National Wild Turkey Federation

cc: The Honorable Senator Jerry Hill
Members, Senate Public Safety Committee