

FINAL STATEMENT OF REASONS

UPDATE OF INITIAL STATEMENT OF REASONS

Sections 4260, 4261, 4262, 4263, and 4264.

In section 4260 (a), we revised the date of and added the complete name of the form, “Ammunition Vendor License (Non-Firearms Dealer), Form BOF 1021 (Orig. 01/2018).” In section 4260 (b), we revised the date of and added the complete name of the form, “Ammunition Vendor License Renewal Fee Transmittal, Form BOF/CAV-0012 (Orig. 01/2018).” This is a non-substantial change.

In section 4263, subdivision (a), we added the word “to” in the statement, “Subdivision (a) authorizes ammunition vendors to charge a fee not [to] exceed five dollars (\$5)...” This change is grammatical and non-substantive.

In the Initial Statement of Reasons, under the heading “§ 4264. Suspension and Forfeiture of Ammunition Vendor License,” the reference to Government Code section 1500 et seq. is a typo and should be Government Code section 11500 et seq. The reference is correct in the text of the regulation.

In section 4264 we have deleted from the Authority and Reference section references to Government Code sections 11500 et seq. The reference is unnecessary because the Department is not interpreting those sections. (Cal. Code Regs., tit. 1, § 14.) This is a non-substantive change.

There is no additional information to be updated. All other information provided in the Initial Statement of Reasons is accurate and current. Title 11, Division 5, Sections 4261, 4262, 4263, and 4264 were adopted as originally proposed.

SUMMARY OF COMMENTS AND DOJ RESPONSES

The Department received 72 different comments from a total of 115 persons. Attachment A (25 pages) is a summary of the comments submitted during the 45-day comment period and the Department’s responses. Attachment B is an alphabetical list (4 pages) of the commenters and identifies (by number) the comment(s) made by each person.

ALTERNATIVES DETERMINATION

The Department has determined that no alternative would be more effective in carrying out the purpose for which the regulation is proposed or would be as effective and less burdensome to affected private persons than the proposed regulation or would be more cost-effective to affected

private persons and equally effective in implementing the statutory policy or other provision of law.

LOCAL MANDATE DETERMINATION

The proposed regulation does not impose any mandate on local agencies or school districts.

INCORPORATED BY REFERENCE DOCUMENTS

Publication of the incorporation by reference documents would be cumbersome, unduly expensive, or otherwise impractical.

PUBLIC COMMENTS AND DEPARTMENT OF JUSTICE RESPONSES

#	Summarized Comment	DOJ Response
1.	General Opposition to the Ammunition Vendor Regulations	We received a number of non-specific, generalized comments in opposition to any regulation of the sale of ammunition. The voters, however, approved Proposition 63 on November 8, 2016 which, along with Senate Bill 1235, direct the Department to implement these regulations. Absent a specific comment regarding this regulatory submittal, the Department of Justice cannot provide a more specific response.
2.	How does a prospective ammunition vendor applicant lawfully obtain a license?	Section 4260 (Title 11, Division 5, Chapter 10) of the regulations specify the ammunition vendor license application requirements.
3.	Will rod and gun clubs be provided an exemption for ammunition purchases that are used for training sessions, competitions, and educational sessions held by the organization?	These regulations pertain only to the licensing of ammunition vendors – not the purchase of ammunition. The substance of the comment is therefore not within the scope of this regulatory submittal.
4.	The regulations are unduly burdensome, and collectors should be afforded some exemptions.	The Department has made every effort to limit the burden of the regulations and to pursue a simple and straightforward path for ammunition vendor licensing. The comment on exemptions for collectors is not within the scope of this regulatory submittal.
5.	Are applicants required to have a business address, or can an ammunition vendor licensee use their residence/home address?	Applicants can use either address for the ammunition vendor license application. However, the address listed on the application (Form BOF 1021) will be the location where the license is valid.
6.	Without the ability to purchase ammunition online, amongst the other proposed changes, the regulations will cause the price of ammunition to increase.	These regulations pertain only to the licensing of ammunition vendors – not the purchase of ammunition. The substance of the comment is therefore not within the scope of this regulatory submittal.
7.	These regulations are unconstitutional.	This is a generalized comment to which the Department cannot provide a response.
8.	The regulations will hurt law-abiding citizens and will not stop criminals.	This is a generalized comment to which the Department cannot provide a response.
9.	These regulations will create a black market, where the trading and selling of ammunition ultimately goes unregulated.	This is a generalized comment to which the Department cannot provide a response.

#	Summarized Comment	DOJ Response
10.	These regulations are simply a tax on an already over-taxed system.	This is a generalized comment to which the Department cannot provide a response.
11.	The regulations make it more difficult to obtain ammunition, which makes anyone who possess ammunition a target for a theft/robbery.	This is a generalized comment to which the Department cannot provide a response.
12.	The regulations will be detrimental to online sales of ammunition, which has been beneficial for the industry. The majority of online purchases are done for efficiency purposes, and the system should not be changed.	These regulations pertain only to the licensing of ammunition vendors – not the purchase of ammunition. The substance of the comment is therefore not within the scope of this regulatory submittal.
13.	Did not receive proper notification of the proposed rulemaking.	In accordance with the Administrative Procedure Act the Department issued the Notice of Proposed Rulemaking for the regulations on July 19, 2017. Additionally, the Department held a 45-day public comment period and an in-person public hearing on September 12, 2017. Pursuant to California Government Code section 11346.4(f), the failure to mail notice to any person does not invalidate the action taken by the Department.
14.	The regulations will force people to import their ammo, which will make tracking even more difficult.	This is a generalized comment to which the Department cannot provide a response.
15.	Will the regulations address the importing of weapons and ammunition? If so, how?	These regulations pertain only to the licensing of ammunition vendors – not the purchase of ammunition or the importation of firearms. The substance of the comment is therefore not within the scope of this regulatory submittal.
16.	Restricting the amount of ammunition that citizens may purchase will deprive the state of sales tax revenue and DROS fee revenue.	This is a generalized comment to which the Department cannot provide a response.
17.	The regulations will cause people to purchase less ammunition, which will close stores that sell firearms products and will eliminate the associated jobs.	At least 90 percent of ammunition businesses are also Federal Firearm Licensee (“FFL”) holders. As such, each is automatically deemed a licensed ammunition vendor pursuant to Penal Code section 30385(d). The Department estimates that there are only about 200 non-FFL businesses that require separate licensing. Consequently, the Department has concluded that the impact on ammunition sales will be minimal. These regulations simply facilitate the licensing of non-FFL vendors. In any event, the regulation of ammunition sales is mandated by Proposition 63 which the voters approved on November 8, 2016.

#	Summarized Comment	DOJ Response
18.	<p>What is the proposed transfer fee for ammunition under the regulations? Is the specified amount per box, per batch of each caliber, etc.?</p> <p>The regulation language should be more specific in this area.</p>	<p>For private party transfers, dealers may charge a fee of up to \$5 per transaction, not including any agreed upon storage fee assessed when the purchaser will not be present for the immediate delivery of the ammunition. An ammunition vendor is not required by law to facilitate a private party ammunition transfer. The Department set the private party ammunition transfer fee (half that of a private party firearm transfer) at an amount that is low enough to encourage people to transfer ammunition properly under the law (to avoid illegal activity), but high enough that dealers would be inclined to accept/process the transfer.</p>
19.	<p>By charging the same handling fee for a box of 50 rounds or a case of much more ammunition, the regulations are encouraging people to stockpile and hoard ammunition. Is this the goal?</p>	<p>No. The Department set the private party transfer fee at an amount that is low enough to encourage people to transfer ammunition properly under the law (to avoid illegal activity), but high enough that dealers would be inclined to accept/process the transfer.</p>
20.	<p>The regulations should instead increase penalties for individuals who use firearms to commit violent crimes, instead of raising the price of ammunition for the general public.</p>	<p>These regulations pertain only to the licensing of ammunition vendors. The enabling statutes did not grant the Department the authority to regulate the penalties for individuals who use firearms to commit violent crimes. The substance of the comment is therefore not within the scope of this regulatory submittal.</p>
21.	<p>There should be different public hearing times and locations held for those who cannot make the originally scheduled public hearing.</p>	<p>The public hearing requirements are set by law. In accordance with the Administrative Procedure Act, the Department noticed and held a public hearing on September 12th. The Department also held a 45-day public comment period, where electronic and hard copy comments were received for those who could not attend the public hearing.</p>
22.	<p>Proposition 63 specified that the regulations would need to be implemented by July 1, 2017, so why is there a delay in the regulation process?</p>	<p>The Department has taken additional time on the rulemaking to ensure the most accurate and complete regulations are in place.</p>
23.	<p>There are too many gun and ammunition related regulations already in place, so we do not need any additional regulations.</p>	<p>This is a generalized comment to which the Department cannot provide a response.</p>
24.	<p>Support for the regulations and the enforcement of Proposition 63.</p>	<p>The Department is grateful for the public input and to address the needs of the regulated public.</p>

#	Summarized Comment	DOJ Response
25.	The public comment period was only open for two hours.	At the public hearing on September 12, 2017, the video conference was idle for one hour of the two-hour hearing with no members of the public wishing to comment on the regulations. Additionally, the Department held a 45-day comment period for those unable to attend the public hearing.
26.	<p>The July 14th Notice Register states that the regulations and supporting documents would be available on the DOJ website, but the domain redirected to a site that did not contain the documents.</p> <p>Since the information was not available, as prescribed, DOJ should withdraw the regulations and re-submit properly.</p>	The Office of Administrative Law (“OAL”) Notice Registry was not posted on the OAL website until late on July 14, 2017. The Department then posted the documents on the DOJ website on July 17, 2017. The Department sent notices to the list of interested parties on July 19, 2017. Additionally, the Department adjusted the notice and 45-day comment period to begin on July 28, 2017, and ending on September 12, 2017, to ensure a full comment period was provided in accordance with the law.
27.	The ammunition dealer fee should be reduced to a maximum charge of \$1.00 for the entire purchase.	If the commenter is referring to private party transfers, as described in Penal Code section 30312, the Department set the fee at an amount that is low enough to encourage people to transfer ammunition properly under the law (to avoid illegal activity), but high enough that dealers would be inclined to accept/process the transfer.
28.	Thank you for clarifying the boundaries of Proposition 63.	Comment received. Thank you for your input.
29.	Would like to know when and where the public hearing on the regulations will occur?	The public hearing on the regulations was held at the Resources Building Auditorium (1416 9 th Street, Sacramento, CA 95814) on September 12, 2017 from 10:00AM to 12:00PM. This information was posted on the Department’s website on July 19, 2017 date, and in the Notice Register on July 28, 2017.
30.	The public hearings should have people appointed/hired in attendance who are able and willing to respond to comments.	The purpose of a public hearing is receive comments and recommendations from the public. The regulatory process provides this response to public comment procedure for answering comments.
31.	These regulations will likely cause stores to no longer allow for online ammunition purchases to be made and picked up at their location.	Penal Code section 30312 of the governing statute permits online purchases. Moreover, the Department set the private party transfer fee at an amount that is high enough to encourage dealers to process such transfers.

#	Summarized Comment	DOJ Response
32.	The regulations will cause non-gun specific retailers from carrying ammunition all together, which will limit ammunition availability and consumer choice.	This is a generalized comment to which the Department cannot provide a response.
33.	The regulations pertaining to the display of ammunition in stores is written in a broad manner that could use clarification.	Penal Code section 30350 provides that “[a]n ammunition vendor shall not sell or otherwise transfer ownership of, offer for sale or otherwise offer to transfer ownership of, or display for sale or display for transfer of ownership of any ammunition <u>in a manner that allows that ammunition to be accessible to a purchaser or transferee without the assistance of the vendor or an employee of the vendor.</u> ” (Emphasis added.) The statute is specific enough to provide notice to vendors about what is prohibited but, at the same time, it allows a vendor the ability to implement the law in a way that best suits its business. These regulations closely follow that guidance.
34.	Would comments from business owners, who are knowledgeable in the field, be taken into consideration at the hearing and during the finalization of the regulations?	Yes. The Department has taken the comments received during the public comment period and at the public hearing into consideration.
35.	Agree with the goal of reducing gun violence and prohibiting access to those that should not possess ammunition.	Comment received. Thank you for your input.
36.	<p>The requirement for installing cages, gates, locks, and cabinets is financially burdensome on small businesses and would still be ineffective at preventing unauthorized access to ammunition.</p> <p>The penal code outlining the display of ammunition needs to be further defined and the regulations should be made less financially burdensome to the existing display methods.</p>	Penal Code section 30350 provides that “[a]n ammunition vendor shall not sell or otherwise transfer ownership of, offer for sale or otherwise offer to transfer ownership of, or display for sale or display for transfer of ownership of any ammunition <u>in a manner that allows that ammunition to be accessible to a purchaser or transferee without the assistance of the vendor or an employee of the vendor.</u> ” (Emphasis added.) The statute is specific enough to provide notice to vendors about what is prohibited but, at the same time, it allows a vendor the ability to implement the law in a way that best suits its business. These regulations closely follow that guidance.
37.	The regulations are not practical, as they do not address how the ammunition may be handled once an employee has assisted a customer or once a purchase has been made.	These regulations pertain only to the licensing of ammunition vendors. The substance of this comment is therefore not within the scope of this regulatory submittal.

#	Summarized Comment	DOJ Response
38.	There is no need for a consumer license, and the license should just be reserved for the vendor. State and federal law already prohibits ammunition for those convicted of crimes or for those who are underage. The consumer license is not helpful, unless DOJ plans to also do a psychological evaluation on each licensee.	Purchasers are not required to obtain a license.
39.	<p>Define ammunition beyond Penal Code 16150: Loose rounds or packaged rounds? Packaged rounds are in sealed (often taped) boxes, which are then sealed in cardboard cases that are also glued, taped and stapled shut.</p> <p>“Ammunition” should be further defined as “loose rounds,” “original packaging.”</p>	Redefining the statutory definition of ammunition is outside the scope of this rulemaking.
40.	Is an ammunition retail store still “open to the public” if it (a) has a sign at entrance that denies entry to those persons prohibited by law to purchase or handle ammunition? (b) has a sign at entrance that states business “reserves the right to refuse service to anyone,” (c) has a sign at entrance that states, “only those persons holding a valid ammunition purchaser’s license may enter,” (d) only allows entry to persons who have been made members (similar to wholesale stores: restaurant, beauty supply). Membership would be made based on providing personal information & a declaration that member is not prohibited by law from purchasing or handling ammunition. (e) If store has an electronically secured entrance/exit gate in which an employee must personally approve entrance and exit of each customer (similar to gates at pawnshops or jewelry stores).	Penal Code section 30350 provides that “[a]n ammunition vendor shall not sell or otherwise transfer ownership of, offer for sale or otherwise offer to transfer ownership of, or display for sale or display for transfer of ownership of any ammunition <u>in a manner that allows that ammunition to be accessible to a purchaser or transferee without the assistance of the vendor or an employee of the vendor.</u> ” (Emphasis added.) The statute is specific enough to provide notice to vendors about what is prohibited but, at the same time, it allows a vendor the ability to implement the law in a way that best suits its business. These regulations closely follow that guidance.

#	Summarized Comment	DOJ Response
41.	<p>Is ammunition considered “locked” if it is sealed in original packaging, which includes tape, glue, and/or staples as well as additional sealed boxes, which also include tape, glue and/or staples? (b) Are containers considered locked if they are secured by plastic zip/cable ties? (c) If a store’s entrance/exit is sealed with an electronically controlled gate, is the store then a “locked container?” (d) Can the ammunition be surrounded by a locked gate?</p> <p>The definition should allow for display of ammunition that is in original sealed packaging that includes glue, tape and/or staples, as well as additional sealed cardboard boxes to be considered, “locked and/or secured.”</p> <p>Ammunition cans should be considered lock when secured by plastic zip ties/cable ties – requiring key locks would be financially burdensome. The regulations should also allow for ammunition that is in original sealed packaging that includes glue, tape and/or staples to be displayed using barriers such as rope and/or signs that inform customers that they may not touch boxes without employee assistance.</p>	<p>Penal Code section 30350 provides that “[a]n ammunition vendor shall not sell or otherwise transfer ownership of, offer for sale or otherwise offer to transfer ownership of, or display for sale or display for transfer of ownership of any ammunition <u>in a manner that allows that ammunition to be accessible to a purchaser or transferee without the assistance of the vendor or an employee of the vendor.</u>” (Emphasis added.) The statute is specific enough to provide notice to vendors about what is prohibited but, at the same time, it allows a vendor the ability to implement the law in a way that best suits its business. These regulations closely follow that guidance.</p>

#	Summarized Comment	DOJ Response
42.	<p>“Cage”: (a) What material must the cage be? (b) Does the cage need to have a top?</p>	<p>Penal Code section 30350 provides that “[a]n ammunition vendor shall not sell or otherwise transfer ownership of, offer for sale or otherwise offer to transfer ownership of, or display for sale or display for transfer of ownership of any ammunition <u>in a manner that allows that ammunition to be accessible to a purchaser or transferee without the assistance of the vendor or an employee of the vendor.</u>” (Emphasis added.) The statute is specific enough to provide notice to vendors about what is prohibited but, at the same time, it allows a vendor the ability to implement the law in a way that best suits its business. These regulations closely follow that guidance.</p>
43.	<p>“Purchaser or transferee” – (a) as is common in retail stores, customers utilize shopping carts to browse the store before making a purchase. If purchaser requests the assistance from employee to access ammunition and access is granted, is purchaser allowed to place sealed & boxed ammunition in shopping cart prior to purchase? (b) Once purchase has been made, is customer allowed to remain in store with their purchase, should they decide to continue browsing? The ammunition is now their property, but no longer in a “cage.”</p>	<p>(a) Penal Code section 30350 provides that “[a]n ammunition vendor shall not sell or otherwise transfer ownership of, offer for sale or otherwise offer to transfer ownership of, or display for sale or display for transfer of ownership of any ammunition <u>in a manner that allows that ammunition to be accessible to a purchaser or transferee without the assistance of the vendor or an employee of the vendor.</u>” (Emphasis added.)</p> <p>(b) These regulations pertain only to the licensing of ammunition vendors. The substance of the comment is therefore not within the scope of this regulatory submittal.</p>
44.	<p>Consider the removal of the ammunition purchaser documentation requirements, since this is costly and will only create a database of law-abiding citizens.</p>	<p>These regulations pertain only to the licensing of ammunition vendors – not the purchase of ammunition. The substance of the comment is therefore not within the scope of this regulatory submittal.</p>

#	Summarized Comment	DOJ Response
45.	<p>The California Penal Code sections applying to the licensing of ammunition vendors appear to be intended to apply just to retailers who sell to the general public, but not to wholesalers. Prohibited persons cannot obtain ammunition from wholesalers, so there is no reason for the regulations to apply to them.</p> <p>Chapter 1 of Division 10, Ammunition, taken in its entirety (Penal Code Sections 30210 - 30395), appears to apply only to retail ammunition sales made to the general public and to private party transfers, not to wholesale transactions. Section 30342 is also not clear on this distinction and could be in conflict with other Penal Code sections.</p> <p>Accordingly, the ammunition vendor licensing regulations proposed by the department (CCR Title 11, Division 5) should be revised to reflect the above distinction between wholesalers and retailers, and to clarify whether wholesalers need to obtain an ammunition vendors license for the conduction of wholesale transactions.</p>	<p>Wholesalers are not exempt from the ammunition vendor licensing requirement, but they are exempt from the reporting/recording requirements. This exemption is stated in Penal Code section 30352 (e)(5).</p>
46.	<p>The proposed \$198 fee is too burdensome for small retailers and could cause some stores to discontinue their sale of ammunition. The fee should be reduced until we have evidence of the true costs of the licensing program.</p>	<p>As explained in the Initial Statement of Reasons, this fee was arrived by allotting only one half-time person per year to process all of the associated background checks and documentation pertinent to the program. The cost of that position was then distributed across the known group of non-FFL vendors. Based on the Department's experience, this is the minimum that should be dedicated to the program.</p>
47.	<p>The initial cost of the vendor license should be pro-rated to reflect the proportional amount of the license year remaining before renewal is required. Another option is for the license to be valid for one year from the date of license issuance.</p>	<p>The Department has modified proposed section 4261(b) to conform with Penal Code section 30385(b).</p>

#	Summarized Comment	DOJ Response
48.	<p>In rural and sparsely populated areas, there may not be many places for people to buy ammunition, so the increased licensing requirements and fees could make it hard for them to find a store to purchase ammunition.</p>	<p>This is a generalized comment to which the Department cannot provide a response.</p>
49.	<p>Penal Code Section 30312 provides exemptions from vendor licensing recordkeeping and reporting requirements for sales of ammunition to specified persons and entities. Section 30330 also provides exemptions for sales to the military and law enforcement. It would appear that sales made by ammunition wholesalers to specified agencies, entities, and their employees who use it in the conduct of their duties/businesses are intended to be exempt from the licensing requirements.</p> <p>However, Penal Code Section 30342 is not clear relative to the distinguishing between ammunition retailers who sell to the general public and ammunition wholesalers that do not.</p>	<p>All ammunition vendors (defined in Penal Code section 30342 as any person, firm, corporation, or other business enterprise selling more than 500 rounds of ammunition in any 30-day period) must obtain an ammunition vendor license.</p> <p>Although wholesalers are not exempt from the ammunition vendor licensing requirement, they are exempt from the reporting/recording requirements. This exemption is stated in Penal Code section 30352 (e)(5).</p>

#	Summarized Comment	DOJ Response
50.	<p>Chapter 1 of Division 10, Ammunition, appears to be intended to apply ammunition purchaser personal information recording and reporting requirements only to ammunition sales made to the general public and to private party transfers, not to governmental law enforcement agencies, their designated personnel, and other persons and entities that use the ammunition in the normal course and scope of their duties/businesses.</p> <p>Clarification is sought from DOJ as to whether the ammunition vendor customer’s personal information recording and reporting requirement exemptions would also apply to security companies and their armed guard personnel (regulated by the State Bureau of Security & Investigative Services), privately owned law enforcement educational and training facilities, public utility company security personnel, police/security departments and their personnel of universities and other educational institutions, non-profit institutions having security departments such as hospitals, corporations having their own security departments, law enforcement operated academies and their personnel, Tribal law enforcement/security departments and their personnel, state and local government agencies with law enforcement duties (i.e.- fire departments, animal control, correctional facilities, parole & probation, harbor patrol, etc.), and other institutions, entities, and persons who lawfully possess a firearm and ammunition in the conduct of their occupational duties.</p> <p>Not all are post certified, but they all engage in security for government or government-owned entities and should share the same exemptions.</p> <p>The exemptions to the ammunition vendor customer’s personal information recording and reporting requirements should apply to entities and persons, as described above, who are not members of the general public and who purchase it for use in the course and scope of their business/employment.</p>	<p>The ammunition vendor customer information reporting and recording requirements are required for all purchasers, unless expressly exempt under the statute (Penal Code section 30352).</p>

#	Summarized Comment	DOJ Response
51.	<p>The current Penal Code sections governing the sale of ammunition and licensing of ammunition vendors is unclear on whether the vendor licensing law requirements for recording the personal information of ammunition buyers is intended to apply to sales made to the general public but not to retail/wholesale transactions that do not involve the public.</p> <p>Recently added Section 30342 is not clear on the distinction, and it could be interpreted to apply to all ammunition retailers and wholesalers, even when not selling ammunition to the general public. This section appears to conflict with other Penal Code sections that are relevant to the subject matter.</p>	<p>All ammunition vendors (defined in Penal Code section 30342 as any person, firm, corporation, or other business enterprise selling more than 500 rounds of ammunition in any 30-day period) must obtain an ammunition vendor license.</p> <p>Although wholesalers are not exempt from the ammunition vendor licensing requirement, they are exempt from the reporting/recording requirements. This exemption is stated in Penal Code section 30352 (e)(5).</p>

<p>52. Section 4260</p> <ol style="list-style-type: none"> 1. Does the Centralized List of Firearms Dealers License have to be posted at each location of Point of Sale or cash register? 2. Does the Certificate of Eligibility (COE) for each employee include administration, Shipping, receiving, manufacturing and drivers? <p>Under COE guidelines, if any of our employees fail to qualify for the COE under California Law?</p> <ol style="list-style-type: none"> 3. Will we be able to terminate an employee under those grounds? 4. What effect will that have on the employee’s ability to collect unemployment? 5. What effect will that have on the Company’s unemployment liability? <p>Section 4262</p> <p>Penal Code Section 30350</p> <p>With Regard to the container that houses ammunition during the sale to the public:</p> <ol style="list-style-type: none"> 6. Will a rack system that is not within reach to the public be considered acceptable? 7. Will a locking net over pallets of ammunition be sufficient for nightly storage at gun shows? 8. Does the paid entrance to a secured venue negate the storage requirements? 9. Are the restrictions of access to ammunition only during the sale of? 10. Are there restrictions for access to storage of ammunition not for sale? 	<p>Section 4260</p> <ol style="list-style-type: none"> 1. This comment is unclear. An ammunition vendor does not need to be on the Centralized List, but they may be on the list if they are a Certified Firearms Dealer. 2. The Certificate of Eligibility is a requirement for any agent or employee of the licensed ammunition vendor who handles, sells, delivers, or has under his or her custody or control any ammunition (Penal Code section 30347). 3 Through 5. These regulations pertain only to the licensing of ammunition vendors – not the purchase of ammunition. The substance of the comment is therefore not within the scope of this regulatory submittal. <p>Section 4262</p> <p>6 Through 10. Penal Code section 30350 provides that “[a]n ammunition vendor shall not sell or otherwise transfer ownership of, offer for sale or otherwise offer to transfer ownership of, or display for sale or display for transfer of ownership of any ammunition <u>in a manner that allows that ammunition to be accessible to a purchaser or transferee without the assistance of the vendor or an employee of the vendor.</u>” (Emphasis added.) The statute is specific enough to provide notice to vendors about what is prohibited but, at the same time, it allows a vendor the ability to implement the law in a way that best suits its business. These regulations closely follow that guidance.</p> <ol style="list-style-type: none"> 11. This comment is unclear. However, a Certificate of Eligibility is a requirement for any agent or employee of the licensed ammunition vendor who handles, sells, delivers, or has under his or her custody or control any ammunition (Penal Code section 30347). 12. Penal Code section 30350 provides that “[a]n ammunition vendor shall not sell or otherwise transfer ownership of, offer for sale or otherwise offer to transfer ownership of, or display for sale or display for transfer of ownership of any ammunition <u>in a manner that allows that ammunition to be accessible to a purchaser or transferee without the assistance of the vendor or an employee of the vendor.</u>” (Emphasis added.) The statute is specific
--	--

<p>11. Do Government representatives or private inspectors need a COE prior to entrance to a storage facility?</p> <p>12. Is there a process for building maintenance or contractors during building improvements regarding COE?</p> <p>Manufacturing and reloading ammunition:</p> <p>13. Will customers with spent casings be required to re-qualify for a purchase if we reload new components in their used casings?</p> <p>14. Will individual component purchases fall under the same regulations as loaded ammunition? (casings, primers, powder, projectile)?</p> <p>Section 4263</p> <p>Vendor Fee for Processing a Private Party ammunition sale:</p> <p>15. Once a customer has purchased ammunition are we legally allowed to surrender of transfer ownership at the point of sale?</p> <p>16. Does the fee for the ammunition vendor may charge the purchaser for processing an ammunition sale between two parties fluctuate per vendor or is there a set amount for all Centralized Firearms Dealers?</p> <p>17. What about return ammo from gun shows how do the customers return ammo?</p> <p>18. Are gun clubs exempt from the laws Rifle pistol and shotgun?</p> <p>19. What are the rules for ammo they get from the club or if they bring their own Ammo?</p> <p>20. Does hired security change the storage requirements? Public or government?</p>	<p>enough to provide notice to vendors about what is prohibited but, at the same time, it allows a vendor the ability to implement the law in a way that best suits its business. These regulations closely follow that guidance.</p> <p>13. Yes.</p> <p>14. No.</p> <p>Section 4263</p> <p>15. These regulations pertain only to the licensing of ammunition vendors. The substance of this comment is therefore not within the scope of this regulatory submittal.</p> <p>16. For private party transfers, dealers may charge a fee of up to \$5 per transaction, not including any agreed upon storage fee assessed when the purchaser will not be present for the immediate delivery of the ammunition. The Department set the private party transfer fee (half that of a private party firearm transfer) at an amount that is low enough to encourage people to transfer ammunition properly under the law (to avoid illegal activity), but high enough that dealers would be inclined to accept/process the transfer.</p> <p>17 Through 19. These regulations pertain only to the licensing of ammunition vendors. The substance of this comment is therefore not within the scope of this regulatory submittal.</p> <p>20. No, Penal Code section 30350 provides that “[a]n ammunition vendor shall not sell or otherwise transfer ownership of, offer for sale or otherwise offer to transfer ownership of, or display for sale or display for transfer of ownership of any ammunition <u>in a manner that allows that ammunition to be accessible to a purchaser or transferee without the assistance of the vendor or an employee of the vendor.</u>” (Emphasis added.) The statute is specific</p>
---	--

<p>21. Are storage requirements for the sale of ammunition changed when the sale takes place with a sworn police officer present?</p> <p>22. What is definition of “out of reach”?</p> <p>23. Will out-of-state residents fall under the same regulations if purchasing in California?</p> <p>24. Can out-of-state vendors ship to an ammunition vendor on the behalf of a California resident?</p> <p>25. Can a licensed California ammunition vendor ship to another licensed vendor on the behalf of a qualified California resident?</p> <p>26. Can that vendor charge a fee, and are there limits to a Vendor transfer fee?</p> <p>27. Do shipping companies require a COE for their drivers or warehouse personnel?</p> <p>28. How will ammunition returns be handled that are more than 50 rds? How will replacement shipments be handled?</p> <p>29. Will armed security guards be considered law enforcement agents?</p> <p>30. Are their written requirements or logs for vendor to vendor sales in the state of California?</p> <p>Law enforcement Sales</p> <p>31. Agencies that wish to pick up merchandise at our warehouse often send cadets or volunteers. Will these be acceptable under authorized representatives or agents?</p> <p>32. Does administrative staff fall under authorized representative? What is required proof of authorization?</p>	<p>enough to provide notice to vendors about what is prohibited but, at the same time, it allows a vendor the ability to implement the law in a way that best suits its business. These regulations closely follow that guidance.</p> <p>21. No, Penal Code section 30350 provides that “[a]n ammunition vendor shall not sell or otherwise transfer ownership of, offer for sale or otherwise offer to transfer ownership of, or display for sale or display for transfer of ownership of any ammunition <u>in a manner that allows that ammunition to be accessible to a purchaser or transferee without the assistance of the vendor or an employee of the vendor.</u>” (Emphasis added.) The statute is specific enough to provide notice to vendors about what is prohibited but, at the same time, it allows a vendor the ability to implement the law in a way that best suits its business. These regulations closely follow that guidance.</p> <p>22. Penal Code section 30350 provides that “[a]n ammunition vendor shall not sell or otherwise transfer ownership of, offer for sale or otherwise offer to transfer ownership of, or display for sale or display for transfer of ownership of any ammunition <u>in a manner that allows that ammunition to be accessible to a purchaser or transferee without the assistance of the vendor or an employee of the vendor.</u>” (Emphasis added.) The statute is specific enough to provide notice to vendors about what is prohibited but, at the same time, it allows a vendor the ability to implement the law in a way that best suits its business. These regulations closely follow that guidance.</p> <p>23 Through 25. These regulations pertain only to the licensing of ammunition vendors. The substance of this comment is therefore not within the scope of this regulatory submittal.</p> <p>26. For private party transfers, dealers may charge a fee of up to \$5 per transaction, not including any agreed upon storage fee assessed when the purchaser will not be present for the immediate delivery of the ammunition. The Department set the private party transfer fee (half that of a private party firearm transfer) at an amount that is low enough to encourage people to transfer ammunition properly under the law (to avoid illegal activity), but high enough that dealers would be inclined to accept/process the transfer.</p>
---	---

#	Summarized Comment	DOJ Response
	<p>33. Can we ship to licensed security companies?</p> <p>34. Can we ship ammunition directly to a sworn peace officer?</p> <p>35. When delivery of ammunition is made to a city or county warehouse does the individual receiving or signing the bill of lading need to be law enforcement or have a COE?</p> <p>36. Individuals attending a police or law enforcement academy require a background check or COE?</p> <p>37. Does a receipt or invoice require documentation when sold to a law enforcement officer or agent?</p>	<p>27. The Certificate of Eligibility is a requirement for any agent or employee of the licensed ammunition vendor who handles, sells, delivers, or has under his or her custody or control any ammunition (Penal Code section 30347).</p> <p>28 Through 30. These regulations pertain only to the licensing of ammunition vendors. The substance of this comment is therefore not within the scope of this regulatory submittal.</p> <p>31 and 32. The Certificate of Eligibility is a requirement for any agent or employee of the licensed ammunition vendor who handles, sells, delivers, or has under his or her custody or control any ammunition (Penal Code section 30347).</p> <p>33 Through 37. These regulations pertain only to the licensing of ammunition vendors. The substance of this comment is therefore not within the scope of this regulatory submittal.</p>
53.	<p>1. What do we have to do to become an Ammo dealer (non FFL dealer)?</p> <p>2. When will the application be available to apply?</p> <p>3. What happens if DOJ does not have the application out in time to meet or approve the application by the Jan 01 2018 deadline? (DOJ said not to fill out the one on line due to it has not been approved at this time)</p> <p>4. Does all employees have to be listed on the application that sells Ammo?</p> <p>5. Once approved what is the limit that can be sold to any one person at a shooting range?</p>	<p>1. Section 4260 (Title 11, Division 5, Chapter 10) of the regulations specify the ammunition vendor license application requirements.</p> <p>2. Applications are being accepted now, and the licensing requirement takes effect on January 1, 2018.</p> <p>3. Adjustments will be made, if necessary.</p> <p>4. Ammunition vendor applicants only need to list employees who are required to have a Certificate of Eligibility. The Certificate of Eligibility is a requirement for any agent or employee who handles, sells, delivers, or has under his or her custody or control any ammunition (Penal Code section 30347).</p> <p>5. This is outside the scope of the rulemaking. The proposed regulations do not set a limit on the amount of ammunition that can be sold.</p>

#	Summarized Comment	DOJ Response
54.	<p>Penal Code Section 30385(b) expressly states an ammunition vendor license “shall be valid for a period of one year.” The DOJ cannot issue licenses that are valid for less than a year.</p> <p>If proposed section 4261 (b) is enacted, the duration of an ammunition vendor's license can be shorter than the one-year period required by the Penal Code. For example, if a vendor were to request and receive a license on July 1, the term of that license will be 6 months and not the required year because proposed section 4261(b) states that all vendor licenses have a term ending on December 31. This is clearly contrary to the intent of the public in enacting Proposition 63, who chose to allow ammunition vendor licenses to have a term of one year, regardless of the application date.</p> <p>The proposed regulation should be modified so that it conforms with Penal Code section 30385(b) and states that the term of the license shall be one year from the date of issuance, regardless of when the license was issued. In the case a license is issued prior to January 1, 2018, that license will go into effect on January 1, 2018 and have a term of one year.</p>	<p>The Department has modified proposed section 4261(b) to conform with Penal Code section 30385(b).</p>
55.	<p>Section 4264 (a) of the regulations should be deleted because DOJ has neither express nor implied authority to suspend ammunition vendor licenses. While Penal Code Section 30395 (c) allows “forfeiture” of a vendor’s license, there is no authority for the Department to “suspend” a license. None of the sections that DOJ cites as authority use the word “suspension.”</p>	<p>Pursuant to Penal Code section 30385, the ability to suspend a license is a lesser included authority to the revocation of a license. (See also, Government Code section 11503 [suspension hearings].)</p>
56.	<p>The proposed regulations do not indicate when renewal applications must be submitted.</p>	<p>Department of Justice Ammunition Vendor License Renewal Fee Transmittal, form BOF/CAV-0012 (Orig. 01/2018) requires that a renewal applicant “[a]llow 20 business days to process the renewal.”</p>

#	Summarized Comment	DOJ Response
57.	<p>How will vendor violations be identified? Will the DOJ conduct routine inspections of all ammunition vendors, or will DOJ only inspect vendors who are also firearm dealers as part of its Centralized List of Firearm Dealer inspections? It would be unfair to inspect only vendors who are also firearm dealers.</p>	<p>All ammunition vendor license holders will be inspected.</p>
58.	<p>Proposed section 4261 (c) states: "Ammunition vendors must submit to the Department of Justice, a copy of renewals of the licenses specified in section 4260, within 30 days of the license's expiration. Failure to do so will invalidate the ammunition vendor license until a copy of the renewed license is received by the Department of Justice."</p> <p>The use of the word "received" should probably be changed to "issued," as DOJ issues renewed licenses and does not receive them. Alternatively, if DOJ means that an invalidated license is renewed when application for renewal is "received," the sentence should be modified to read: "...until a copy of the application for renewal is received by the Department of Justice."</p>	<p>This regulation pertains to the required local licenses – not the Department issued vendor license.</p>

#	Summarized Comment	DOJ Response
59.	<p>Proposed section 4264 attempts to clarify Penal Code section 30350 by stating, "Pursuant to Penal Code section 30350, ammunition shall not be displayed for sale or transfer in a manner that allows that ammunition to be accessible to a purchaser or transferee without the assistance of the vendor or an employee of the vendor. Ammunition displayed in a shopping area open to the public is not considered 'accessible' provided it is in a locked container (e.g. display case, cabinet, cage)."</p> <p>It is neither clear in the Penal Code, nor in the proposed regulations, whether ammunition "kept behind the counter" must be contained in a "locked container." By "kept behind the counter," we mean ammunition located typically along a wall behind both the store's employees and counter or display case. This merchandise is not locked in a case, but a customer is not allowed in the area and would be challenged by an employee if the customer were to enter the area. We would argue that because a customer cannot go behind the counter without being challenged by an employee, ammunition "kept behind the counter" is not accessible by the public without assistance of the vendor or an employee. But this is not clear in the Code or the proposed regulations and we ask for clarification.</p>	<p>Penal Code section 30350 provides that “[a]n ammunition vendor shall not sell or otherwise transfer ownership of, offer for sale or otherwise offer to transfer ownership of, or display for sale or display for transfer of ownership of any ammunition <u>in a manner that allows that ammunition to be accessible to a purchaser or transferee without the assistance of the vendor or an employee of the vendor.</u>” (Emphasis added.) The statute is specific enough to provide notice to vendors about what is prohibited but, at the same time, it allows a vendor the ability to implement the law in a way that best suits its business. These regulations closely follow that guidance.</p>

#	Summarized Comment	DOJ Response
60.	<p>There is a problem with proposed section 4263, subsection (b), which requires that the storage fee be agreed upon prior to the vendor receiving the ammunition. What remains unclear is what must be done if no agreement is made prior to the ammunition being sent to and received by the vendor. Penal Code section 30312 appears to require ammunition vendors to "promptly and properly" process an ammunition transaction, but proposed section 4263 appears to allow an ammunition vendor to refuse shipment of ammunition when it is sent to the vendor for processing (pursuant to Penal Code section 30312) but the customer does not agree to the transfer fees prior to the vendor receiving the ammunition.</p> <p>DOJ should revise proposed section 4263 to clarify what an ammunition vendor must do if the ammunition vendor and purchaser have not reached an agreement prior to the vendor receiving the ammunition.</p>	<p>These regulations pertain to the licensing of ammunition vendors. Regulations concerning the purchase of ammunition will be promulgated in the future.</p>

<p>61. The BOF 1021, "Application for Ammunition Vendor License (Non-Firearms Dealer)," form presents a problem. Part D located on page 3 of 5 appears to require the COE numbers for all ammunition vendor employees prior to the issuance of the ammunition vendor license. The requirements for the form, located on page 4 of 5, confirm that assumption. Under "Application Requirements[.]" the form states in pertinent part: "Applications must be accompanied by ... a listing of all employees with a certificate of eligibility (COE)."</p> <p>This requirement puts the proverbial cart before the horse. California law does not require, as a prerequisite for the application and/or obtainment of an ammunition vendor's license, that all the vendor's employees who have access to ammunition possess a COE. Quite the opposite. Penal Code section 30347(a) presumes that the business will be an ammunition vendor prior to the employee being hired and handling the ammunition, but the Code also requires the employee to provide the (licensed) ammunition vendor's name with whom the person is employed and the corresponding address of the vendor.</p> <p>To give effect to BOF 1021 would nullify Penal Code section 30347(a), by potentially preventing a current agent or employee of an ammunition vendor from ever applying for a COE by listing the employer's ammunition vendor information on the COE application. The COE prerequisite in BOF 1021 is irreconcilably inconsistent with the Code.</p> <p>The requirements for an ammunition vendor license located in Penal Code sections 30385 and 30395 do not require the business to provide COE numbers of employees to DOJ prior to the issuance of the license. Only the individual applying for the license or the "responsible person" acting on behalf of an entity is required to have a COE.</p> <p>Requiring a vendor to have its employees acquire a COE prior to the application of a vendor license will prove counterproductive. It is better to allow the vendor to acquire its license and then have the employees acquire their COEs once the license is granted. Then, if</p>	<p>It is important that anyone handling ammunition pass a background check and for that reason the application for a license and the application for a Certificate of Eligibility requires verification of the information under penalty of perjury. As stated in section 4260(a)(4) of the regulations, an ammunition vendor license applicant must have a Certificate of Eligibility. The COE is also a requirement for any agent or employee who handles, sells, delivers, or has under his or her custody or control any ammunition (Penal Code section 30347). If no vendor employees have COEs and/or the employees' names and COE numbers are not listed on Form BOF 1021, the only individual authorized to handle, sell, deliver, or have in his or her custody or control any ammunition, is the license applicant (who is required to have a COE).</p>
--	---

#	Summarized Comment	DOJ Response
	the employee does not possess a COE prior to January 1, 2018- either by the employee's own delay in applying or DOJ's delay in processing- the vendor can restrict the employee's access to ammunition until the COE is obtained. It makes no sense to delay and force a vendor to cease business because a vendor license is delayed for want of a COE by one of its employees.	

#	Summarized Comment	DOJ Response
62.	<p>The "Ammunition Vendor License Renewal Fee Transmittal" document, referenced as form BOF/CAV-0012, appears to be an incomplete form or some kind of template for a renewal letter. If the former is true, DOJ should resubmit the form and reopen the public comment period for that form. If BOF/CAV-0012 is supposed to be a template for a renewal letter, it is woefully lacking in clarity. Only need to read the first paragraph to note the problems:</p> <p>“Make any business information changes next to the line number that requires correction. If no changes are made, indicate no change by checking the appropriate box. All licensees must sign and date the renewal form. Submit the signed form and fee to...”</p> <p>What "lines" are these instructions referring to? Following the instructions and address stated is an outline of what appears to be the required information for an ammunition vendor license, but this information is not provided in the same order as the application form (BOF 1021). If BOF/CAV-0012 is a "transmittal," where is the "form" that is referenced in the instructions? This document cannot be the form, as it appears to require information, like the business name, address, city, and California zip code, inserted into placeholders at the top of the document.</p> <p>Perhaps an actual renewal form is in order, or even modifying the application form (BOF 1021) to make it an application/renewal form would make more sense than what is proposed now.</p> <p>Like the application form, the "transmittal" document appears to require the vendor to provide COE information for employees. For the stated reasons above, this remains incorrect.</p>	<p>More than 2,000 FFLs have been using this format for the submission of changed information for years and have not reported any problems.</p>
63.	<p>If you are on the Centralized List, you are already qualified. Will you receive an actual vendor license or something that needs to be posted?</p>	<p>Yes, every ammunition vendor licensee will receive a license.</p>

#	Summarized Comment	DOJ Response
64.	Regarding gun shows, the Department of Justice has put effective gun show laws on the books in the past, so we want to make sure that we maintain those laws without causing a detrimental impact to those participating in gun show activities.	This is a generalized comment to which the Department cannot provide a response.
65.	The DOJ should release a FAQ that summaries the background information before the formal rulemaking.	The Department did provide notice of the regulations and an opportunity to comment as a part of the formal rulemaking process.
66.	<p>The Statement of Economic Impact does not accurately account for small retailers who store ammo on pallets and other places because they don't have the ability to store the ammo in secured areas, which will limit how much ammo they can purchase. This will also increase the price of ammo. This will ultimately reduce the overall amount of ammo that is sold in the state, which will also reduce the amount of revenue that the DOJ receives.</p> <p>The cost of developing the infrastructure for DOJ is the same whether it is a few million rounds or hundreds of million rounds. The DOJ stated that they don't anticipate any economic impact, but that is inaccurate.</p>	At least 90 percent of ammunition businesses are also Federal Firearm Licensee ("FFL") holders. As such, each is automatically deemed a licensed ammunition vendor pursuant to Penal Code section 30385(d). The Department estimates that there are only about 200 non-FFL's businesses that require separate licensing. Consequently, the Department has concluded that the impact on ammunition sales will be minimal. These regulations simply facilitate the licensing of non-FFL vendors. In any event, the regulation of ammunition sales is mandated by Proposition 63 which the voters approved on November 8, 2016.
67.	Are law enforcement cadets (such as those in a training program at a community college) exempt? They are not yet official law enforcement, but they are in training and have to supply their own ammunition when they go into that line of education.	These regulations pertain only to the licensing of ammunition vendors – not the purchase of ammunition. The substance of the comment is therefore not within the scope of this regulatory submittal.
68.	Do ammo vendors need to be licensed at each location? What is you are selling ammunition at gun shows? What is you have the ammunition drop shipped at the gun show event and sell it all there? Would you need a license at each gun show location? What if you don't have a storefront?	<p>Yes, the sale of ammunition by a licensed vendor shall be conducted at the location specified in the license (Penal Code section 30348).</p> <p>However, according to Penal Code section 30348(c), a "gun show or event" is exempt from the requirement that the sale of ammunition be conducted at the location specified in the license.</p>
69.	How do you plan to regulate the rule that no employee without a COE can handle ammunition? What about the UPS driver that picks the ammo up off his truck, etc?	These regulations pertain only to the licensing of ammunition vendors. This comment pertains to the enforcement and not the licensing, therefore it is not within the scope of this regulatory submittal.

#	Summarized Comment	DOJ Response
70.	Is one license for each location going to be good for all the employees that handle the ammunition at that location? Or does the owner have to buy multiple licenses for each employee that is handling that ammunition? It should just be one license for the location to limit the cost.	Only one ammunition vendor license is needed for each location. Employees who will be handling, selling, delivering, or have under his or her custody or control any ammunition, will be required to obtain COEs but separate ammunition vendor applications are not needed.
Late Comments Received		
71.	<p>Do the authorization letters have expiration dates? Do we need a letter for each transaction? Do the orders have to be a certain quantity to qualify for a letter? Can we just keep one on file and call it good? Does “law enforcement” carry the same California Penal code definition as “peace officer?” etc.</p> <p>As a result of these concerns, we reached out to the AG’s office via phone and have received three different answers as to the intent of this exclusions. DOJ should provide definitive clarity as to the AG’s intent/interpretation of Section 30312(c)(1) as well as the necessary actions an out-of-state ammunition vendor must take in order to maintain state compliant.</p>	These regulations pertain only to the licensing of ammunition vendors – not the purchase of ammunition. The substance of the comment is therefore not within the scope of this regulatory submittal.
72.	What is the time schedule, or estimated time schedule, for completion and promulgation of the ammunition vendor licensing regulations? Does the Department have any planned revisions to the regulations as currently proposed?	The Department will implement the ammunition vendor regulations as soon as reasonably possible. The Department does not plan any additional revisions to these regulations.

ALPHABETICAL LIST OF COMMENTERS

Last Name	First Name	Comments	Delivery Method
A.	Danny	7, 8	Email
Arebalo	Dave	8	Email
Arriola	Andrew	1	Email
Arthur	John	1, 8	Email
B.	David (protectthefait@gmail.com)	1, 7	Email
Barnes	Keven	7	Email
Bass	Leonard	1, 8	Email
Beguelin	Mike	1, 7	Email
Beltrami	Bart	8, 10	Email
Bouck	Guy	7, 8	Email
Bowhunter	Willie (Willie96021@yahoo.com)	1	Email
Brown	Matthew	1, 7, 8	Email
Browning	Robert	1	Email
Bruno	Terry	1, 7	Email
Buhrer	Mike	1, 8	Email
Cervantes	Jesus	1, 7, 8	Email
Clark	S. (SClark10541@aol.com)	7, 8, 9	Email
Clark	Logan	8	Email
Coelho	Randy	1, 8, 10	Email
Curtis	John	1, 7, 8, 9	Email
Dameron	Charlie	1, 13	Email
Davies	John	1, 8	Email
Day	Alan	Irrelevant	Email
Day	Alan	8	Email
DeLuz	Craig	13, 26	Email
DeLuz	Craig	46	Public Cmt
Dinwiddie	Robert	1, 6, 8, 27	Email
Dominguez	Dean	7	Email
Dooley	Chris	49, 50	Email
Dragoo	Not Provided (rdragoo@yahoo.com)	1	Email
Dutil	Don	29	Email
Elam	Rich	1, 8, 15	Email
Erwin	Carl	6, 7, 8	Email
Falvo	Edward	8	Email

Last Name	First Name	Comments	Delivery Method
Firchow	Gus	7, 8	Email
Fodran	Blaine	1, 6	Email
Fowler	Rick	7	Email
Furry	Fred	1, 7, 8	Email
Gallinatti	Dean	1	Email
Garrison	Aarin	1, 8, 9, 10, 11	Email
Green	Paul	1	Email
Green	Paul	1, 8, 9, 23	Email
Grubbs	David/Linda	24	Email
Haverkamp	Jerry	53	Email
Haverrampt	Jerry	2, 3, 70	Public Cmt
Hepner	Richard	Irrelevant	Email
Heuer	Ruth	6, 8, 10	Email
Hom	Brendon	1, 7, 8	Email
Hoyt	Michael	8	Email
IdeaMachine	(IdeaMachinelm@gmail.co	7, 8, 23	Email
Istre	Grady	1, 8	U.S. Mail
Jacobo	Daniel	1, 6, 8, 17	Email
Jacobo Jr.	Rodrigo	1, 7, 8	Email
Jennings	Dave	8, 9	Email
Jester	Daniel	8	Email
Johnson	Chris	13	Email
Junkel	Paul	1, 8	Email
Karr	Bill	1, 7	Email
Kim	Gary	3	Email
Kim	David	8	Email
Krupnak	Michael	1	Email
Kuempel	Josh	6, 8, 31, 32	Email
Lee	Stephen	1	Email
Lynch	Kathy	45, 46, 51, 64, 65, 67	Public Cmt
mac Gill	Aebe	1	Email
Mailloux	Barbara	1, 6, 23	Email
Maple	Eric	1, 7	Email
Martin	Greg	1, 2, 4, 5	Email

Last Name	First Name	Comments	Delivery Method
McNab	Christy	33, 34	Email
McNab	Christina	11, 17, 35, 36, 37, 38, 39, 40, 41, 42, 43, 4	Email
McNamee/Giottor	Lisa/Don	45, 46, 47, 48	Email
Menotti Jr.	James	1, 21, 26, 30	Email
Meyers	William	1, 13	Email
Miller	Don	1, 7, 13, 21, 25	Email
Moffa	Jared	54, 55, 56, 57	Email
Morency	Tom	1, 12	Email
Morse	Timothy	1, 6, 8, 9, 14	Email
Mortensen	Don	14	Email
Myers	Guy	61, 68, 69	Public Cmt
Neale	Bob	7	Email
Not Provided	Rick	8	Email
Not Provided	Steve (hti@socal.rr.com)	18	Email
Nunes	Michael	1	Email
Okamura	Dean	6, 7, 28	Email
Orr	Shawn	6	Email
Ortiz	Josh	8, 10	Email
Pamplin	Jim	1, 7	Email
Papasergia	Pat	1, 7, 8	Email
Pappas	Harold	1	Email
Paredes	Sam	66	Public Cmt
Pipkins	Jeff	1, 8, 16, 21	Email
Rana	Atif	1, 8	Email
Reed	Dan	54, 58, 59, 60, 61, 62	Public Cmt
Ringgenberg	Keith	45, 46, 47, 48	Email
Rundle	Donovan	7	Email
Sandoval	Brenda	1, 8	Email
Santos	Trevor	45, 46, 47, 48, 49	Email
Sargeant	Steve	1	Email
Sargentini	Vince	2	Email
Schroer	Jerry	1, 6, 7, 22	Email
Selvy	David	Irrelevant	Email
Shenton	Thomas	6, 10, 18, 19	Email

Last Name	First Name	Comments	Delivery Method
Silvoso	Joseph	54, 58, 59, 60, 61, 62	U.S. Mail
Stewart	Phil	7, 10	Email
Stice	Lawrence	1	Email
Sutton	Robert	6, 8, 17	Email
Swanson	Christian	1, 7, 8	Email
Taylor	Eric	1, 26	Email
Templeton	Robert	45, 46, 47	Email
Tucker	Matt	1, 7	Email
Upholt	Gerald	46, 47, 48, 49, 50, 54	Public Cmt
Valgos	Michael	Irrelevant	Email
Vasapolli	James	1, 7, 8	Email
Walker	Randy	45, 46, 47, 48	Email
Walsh	Mike	44, 45, 49, 50, 51, 52	Email
Walsh	Mike	63	Public Cmt
Walsh	Jon	33, 59	Public Cmt
Weller	Micah	1, 8, 14, 20	Email
Wood	Walter	1, 6, 7	Email
York	Charles	1, 6, 7, 10	Email
Late Comments Received			
Eskuchen	Kurt	71 (Late Comment)	Email
Upholt	Gerald	72 (Late Comment)	Email