

## STAFF SUMMARY FOR DECEMBER 7-8, 2016

**32. USE OF DOGS FOR PURSUIT AND TAKE OF MAMMALS****Today's Item****Information** **Action** 

Authorize publication of notice of intent to amend use of dogs for pursuit and take of mammals regulations  
(Section 265, Title 14, CCR)

**Summary of Previous/Future Actions**

- Notice hearing Oct 19-20, 2016; Eureka
- **Today's Discussion hearing Dec 7-8, 2016; San Diego**
- Adoption hearing Feb 22-23, 2017; Santa Rosa

**Background**

In April 2016, FGC adopted changes to Section 265, Title 14, authorizing the use of global positioning system (GPS) collars and treeing switches for dogs aiding a hunter. The Public Interest Coalition filed a petition in Superior Court in Sacramento County (Case No. 34-2016-80002350) seeking a Writ of Mandate invalidating FGC's action. That petition alleges that FGC failed to comply with the procedural requirements of CEQA. FGC has determined that further rulemaking may be necessary to resolve that litigation. The rulemaking and the related CEQA analysis will also help to further inform FGC about the issues related to regulating the use of dogs as an aid to hunting and associated equipment for those dogs. The proposed amended language described below would be necessary for such purposes:

Subsection 265(d)(1): Insert a provision prohibiting the use of treeing switches on dog collars when dogs are used as an aid in hunting. Treeing switches, sometimes called activity switches, are devices on the collar of a dog that incorporate a mercury or electronic switch. This equipment indicates the position of the dogs head with one signal provided remotely to a hunter if the dogs head is down and another signal provided to a hunter if the dogs head is up; this often helps the hunter know if the dog is tracking a scent (with the dog's head down) or looking up (such as when the dog is at the base of a tree with an animal in the tree).

Subsection 265(d)(2): Insert a provision prohibiting the use of GPS-equipped dog collars when dogs are used as an aid in hunting. Certain dog tracking systems rely on GPS-equipped dog collars to transmit the location of the dog to a hunter to track and retrieve hunting dogs in the field while assisting a hunter.

**Significant Public Comments**

About 75 comments have been received requesting FGC to consider extending the ban on GPS collars to include a ban on GPS use while training dogs. Some of the commenters also recommended dogs should remain within sight or on leads, and outright banning dogs from pursuing wildlife due to stress, habitat displacement, destruction of vegetation and possible disease transmission.

STAFF SUMMARY FOR DECEMBER 7-8, 2016

**Recommendation**

**FGC staff:** There is no specific staff recommendation beyond the noticed proposal.

**DFW:** N/A

**Exhibits**

1. [DFW memo, received Oct 11, 2016](#)
2. [ISOR 265](#)
3. [Comments received before 5 p.m. on Nov 22, 2016](#)

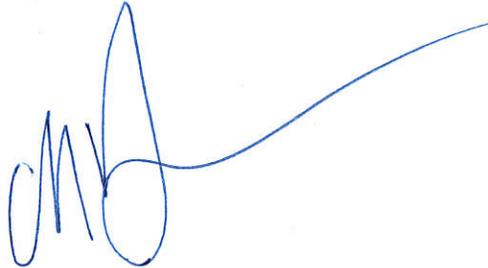
**Motion/Direction (N/A)**

## Memorandum

Date: October 10, 2016

To: Valerie Termini  
Executive Director  
Fish and Game Commission

From: Charlton H. Bonham  
Director



**Subject: Agenda Item for October 19-20, 2016 Fish and Game Commission Meeting, Authorization to Publish Notice of Commission's Intent to Amend Section 265, Title 14, California Code of Regulations (CCR), Re: Use of Dogs for Pursuit/Take of Mammals or for Dog Training**

As requested, attached is the Department's Initial Statement of Reasons for the proposed amendments to Section 265, prohibiting the use of global positioning system (GPS) collars and treeing switches for dogs used to take or pursue mammals. This item is scheduled for notice at the Fish and Game Commission meeting of October 20, 2016.

If you have any questions or need additional information, please contact Acting Wildlife Branch Chief, Rick Mayfield at (916) 445-3555 or by email at [Rick.Mayfield@wildlife.ca.gov](mailto:Rick.Mayfield@wildlife.ca.gov). The public notice should identify Environmental Program Manager, Craig Stowers as the primary contact for this rulemaking. Mr. Stowers can be reached at (916) 445-3553 or by email at [Craig.Stowers@wildlife.ca.gov](mailto:Craig.Stowers@wildlife.ca.gov).

### Attachment

ec: Stafford Lehr, Deputy Director  
Wildlife and Fisheries Division  
[Stafford.Lehr@wildlife.ca.gov](mailto:Stafford.Lehr@wildlife.ca.gov)

David Bess, Chief  
Law Enforcement Division  
[David.Bess@wildlife.ca.gov](mailto:David.Bess@wildlife.ca.gov)

Wendy Bogdan, Chief Counsel  
Office of the General Counsel  
[Wendy.Bogdan@wildlife.ca.gov](mailto:Wendy.Bogdan@wildlife.ca.gov)

Valerie Termini, Executive Director  
Fish and Game Commission  
October 10, 2016  
Page 2

Rick Mayfield, Acting Branch Chief  
Wildlife Branch  
Wildlife and Fisheries Division  
[Rick.Mayfield@wildlife.ca.gov](mailto:Rick.Mayfield@wildlife.ca.gov)

Craig Stowers, Game Program Manager  
Wildlife Branch  
Wildlife and Fisheries Division  
[Craig.Stowers@wildlife.ca.gov](mailto:Craig.Stowers@wildlife.ca.gov)

Craig Martz, Program Manager  
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Mike Randall, Analyst  
Regulations Unit  
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[Mike.Randall@wildlife.ca.gov](mailto:Mike.Randall@wildlife.ca.gov)

STATE OF CALIFORNIA  
FISH AND GAME COMMISSION  
INITIAL STATEMENT OF REASONS FOR REGULATORY ACTION  
(Pre-Publication of Notice Statement)

Amend Section 265  
Title 14, California Code of Regulations (CCR)  
Re: Use of Dogs for Pursuit/Take of Mammals or for Dog Training

Date of Initial Statement of Reasons: October 7, 2016

II. Dates and Locations of Scheduled Hearings:

- |                         |           |                  |
|-------------------------|-----------|------------------|
| (a) Notice Hearing:     | Date:     | October 20, 2016 |
|                         | Location: | Eureka, CA       |
| (b) Discussion Hearing: | Date:     | December 8, 2016 |
|                         | Location: | San Diego, CA    |
| (c) Adoption Hearing:   | Date:     | February 8, 2017 |
|                         | Location: | Santa Rosa, CA   |

III. Description of Regulatory Action:

- (a) Statement of Specific Purpose of Regulation Change and Factual Basis for Determining that Regulation Change is Reasonably Necessary:

Add a new subsection 265(d)(1):

Insert a provision prohibiting the use of treeing switches on dog collars when dogs are used as an aid in hunting. Treeing switches, sometimes called activity switches, are devices on the collar of a dog that incorporate a mercury or electronic switch. This equipment indicates the position of the dog's head with one signal provided remotely to a hunter if the dog's head is down and another signal provided to a hunter if the dog's head is up; this often helps the hunter know if the dog is tracking a scent (with the dog's head down) or looking up (such as when the dog is at the base of a tree with an animal in the tree).

Add a new subsection 265(d)(2):

Insert a provision prohibiting the use of global positioning system (GPS) equipped dog collars when dogs are used as an aid in hunting. Certain dog tracking systems rely on GPS equipped dog collars to transmit the location of the dog to a hunter to track and retrieve hunting dogs in the field while assisting a hunter.

In April 2016, the Fish and Game Commission (Commission) adopted changes to Section 265 authorizing the use of GPS collars and treeing switches for dogs aiding a hunter. The Public Interest Coalition filed a petition in Superior Court in Sacramento County (Case No. 34-2016-80002350) seeking a Writ of Mandate invalidating the Commission's action; the petition alleges that the Commission failed to comply with the procedural requirements of the California Environmental Quality Act (CEQA). The Commission has determined that further rulemaking may be necessary to resolve that litigation. The rulemaking and the related environmental analysis will also help to further inform the Commission about issues related to regulating the use of dogs as an aid in hunting and associated equipment for those dogs. The proposed amended language would be necessary for such purposes.

(b) Authority and Reference Sections from Fish and Game Code for Regulation:

Authority cited: Sections 200, 202, 203, 3960, 3960.2 and 3960.4, Fish and Game Code.

Reference: Sections 3960, 3960.2 and 3960.4, Fish and Game Code.

(c) Specific Technology or Equipment Required by Regulatory Change: None.

(d) Identification of Reports or Documents Supporting Regulation Change: None.

(e) Public Discussions of Proposed Regulations Prior to Notice Publication: None.

IV. Description of Reasonable Alternatives to Regulatory Action:

(a) Alternatives to Regulation Change:

No alternatives were identified.

(b) No Change Alternative:

The no change alternative was considered and rejected because it would not satisfy the allegations of the petition made by the Public Interest Coalition.

(c) Consideration of Alternatives:

In view of information currently possessed, no reasonable alternative considered would be more effective in carrying out the purpose for which the regulation is proposed, 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.

V. Mitigation Measures Required by Regulatory Action:

The proposed regulatory action will have no negative impact on the environment; therefore, no mitigation measures are needed.

VI. Impact of Regulatory Action:

The potential for significant statewide adverse economic impacts that might result from the proposed regulatory action has been assessed, and the following initial determinations relative to the required statutory categories have been made.

(a) Significant Statewide Adverse Economic Impact Directly Affecting Businesses, Including the Ability of California Businesses to Compete with Businesses in Other States:

The proposed action will not have a significant statewide adverse economic impact directly affecting business, including the ability of California businesses to compete with businesses in other states. The proposed regulations will affect a limited number of hunters who pursue mammals with dogs. These hunters may still use other, non-GPS radio collar technology to track and retrieve dogs during the hunt.

(b) Impact on the Creation or Elimination of Jobs Within the State, the Creation of New Businesses or the Elimination of Existing Businesses, or the Expansion of Businesses in California; Benefits of the Regulation to the Health and Welfare of California Residents, Worker Safety, and the State's Environment:

The proposed action will not have significant impacts on the creation or elimination of jobs within the state, the creation of new businesses or the elimination of existing businesses, or the expansion of businesses in California. Sales of GPS collars are not anticipated to decrease as a result of the proposed regulation because GPS collars can still be used by dog owners in a wide variety of applications other than hunting. The Commission does not anticipate benefits to the health and welfare of California residents, or benefits to worker safety. The Commission anticipates benefits to the State's environment by clarifying the requirements for the use of dogs as an aid in hunting mammals as well as the associated equipment for those dogs.

(c) Cost Impacts on Representative Private Persons/Business:

The Commission is not aware of any cost impacts that a representative private person or business would necessarily incur in reasonable compliance with the proposed action.

(d) Costs or Savings to State Agencies or Costs/Savings in Federal Funding to the State: None.

(e) Other Nondiscretionary Costs/Savings to Local Agencies: None.

- (f) Programs Mandated on Local Agencies or School Districts: None.
- (g) Costs Imposed on Any Local Agency or School District that is Required to be Reimbursed under Part 7 (commencing with Section 17500) of Division 4: None.
- (h) Effect on Housing Costs: None.

## VII. Economic Impact Assessment

The proposed action will have no statewide economic or fiscal impact because the proposed action affects a relatively small number of individuals who hunt mammals with dogs. These hunters may still use non-GPS radio collar technology to track and retrieve dogs during the hunt. There are no new costs necessarily incurred by a representative person or business to comply with this regulatory amendment, per APA (section 11342.535), wherein “cost impacts” are defined as those that a person “necessarily incurs in reasonable compliance with the proposed action.”

- (a) Effects of the regulation on the creation or elimination of jobs within the State:

The regulation will not affect the creation or elimination of jobs because it is unlikely to cause an increase or decrease in hunting effort. Sales of GPS collars are not anticipated to decrease as a result of the proposed regulation because GPS collars can still be used by dog owners in a wide variety of applications other than hunting.

- (b) Effects of the regulation on the creation of new businesses or the elimination of existing businesses within the State:

The regulation will not create new businesses or eliminate businesses within the State because it is unlikely to cause an increase or decrease in hunting effort or the manufacture and sale of GPS collars.

- (c) Effects of the regulation on the expansion of businesses currently doing business within the State:

The regulation will not affect the expansion of businesses currently doing business in the State because it is unlikely to cause an increase or decrease in hunting effort or the manufacture and sale of GPS collars.

- (d) Benefits of the regulation to the health and welfare of California residents:

The Commission does not anticipate benefits to the health and welfare of California residents. However, the proposed regulations will clarify requirements for the use of dogs as an aid in hunting mammals as well as the associated equipment for those dogs.

- (e) Benefits of the regulation to worker safety.

The proposed regulation will not affect worker safety.

- (f) Benefits of the regulation to the State's environment:

It is the policy of the State to encourage the conservation, maintenance, and utilization of the living resources of the State. The Commission anticipates benefits to the State's environment by clarifying the requirements for the use of dogs as an aid in hunting mammals as well as the associated equipment for those dogs.

## INFORMATIVE DIGEST (Policy Statement Overview)

In April 2016, the Fish and Game Commission (Commission) adopted changes to Section 265 authorizing the use of GPS collars and treeing switches for dogs aiding a hunter. The Public Interest Coalition filed a petition in Superior Court in Sacramento County (Case No. 34-2016-80002350) seeking a Writ of Mandate invalidating the Commission's action; the petition alleges that the Commission failed to comply with the procedural requirements of the California Environmental Quality Act (CEQA). The Commission has determined that further rulemaking may be necessary to resolve that litigation. The rulemaking and the related environmental analysis will also help to further inform the Commission about issues related to regulating the use of dogs as an aid in hunting and associated equipment for those dogs. The proposed amended language would be necessary for such purposes.

Amend Section 265, Title 14, CCR, by adding new subsections (d)(1) and (d)(2) to prohibit the use of treeing switches and GPS collar equipment for dogs used in the taking of mammals.

### Benefits of the regulations

The proposed regulations will clarify requirements for the use of dogs as an aid in hunting mammals as well as the associated equipment for those dogs.

### Non-monetary benefits to the public

The Commission does not anticipate non-monetary benefits to the protection of public health and safety, worker safety, the prevention of discrimination, the promotion of fairness or social equity and the increase in openness and transparency in business and government.

### Consistency and Compatibility with State Regulations

The Fish and Game Commission, pursuant to Fish and Game Code Sections 200, 202 and 203, has the sole authority to regulate hunting in California. Commission staff has searched the California Code of Regulations and has found no other agency with the authority to regulate the use of dogs for hunting mammals. Therefore the Commission has determined that the proposed amendments are neither inconsistent nor incompatible with existing State regulations.

## REGULATORY TEXT

Section 265, Title 14, CCR is amended to read:

### **§265. Use of Dogs for Pursuit/Take of Mammals or for Dog Training.**

*... [No changes to subsections (a) through (c)]*

(d) Prohibition on Treeing Switches and Use of Global Positioning System Equipment.

(1) Treeing Switches. Electronic dog retrieval collars containing functioning treeing switches (devices consisting of a switch mechanism that results in a change in the transmitted signals when the dog raises its head to a treed animal) are prohibited on dogs used for the pursuit/take of mammals.

(2) Global Positioning System Equipment. Electronic dog retrieval collars employing the use of global positioning system equipment (devices that utilize satellite transmissions) are prohibited on dogs used for the pursuit/take of mammals.

Authority cited: Sections 200, 202, 203, 3960, 3960.2 and 3960.4, Fish and Game Code. Reference: Sections 3960, 3960.2 and 3960.4, Fish and Game Code.

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**From:** Lesley Hudak  
**Sent:** Wednesday, November 23, 2016 6:53 AM  
**To:** FGC  
**Subject:** proposed GPS hound collar ban (Section 265, Title 14, CCR)

To the proposed amendment to Section 265, please add a ban on dog training with GPS collars. Thank you.

Lesley Hudak

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**From:** Julie O'Rielly -- Kananioka'aina  
**Sent:** Tuesday, November 22, 2016 4:59 PM  
**To:** FGC  
**Subject:** BAN GPS collars on Training Dogs

To the proposed amendment to Section 265, please add a ban on dog training with GPS collars.

Please put an end to the barbaric practice of dogs with GPS collars.

ADD to the proposed GPS hound collar ban (Section 265, Title 14, CCR) the words, "or for dog training."

Thank you,  
Julie O'Rielly

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**From:** Sharon Ponsford  
**Sent:** Tuesday, November 22, 2016 4:23 PM  
**To:** FGC  
**Subject:** Banning GPS collars on hounds for hunting and training

Dear Commissioners:

I do not support the use of GPS collars on hounds used for hunting, or for the training of hounds. Hound trainers and handlers need to be close to their dogs at all times. That cannot be accomplished with the use of GPS collars. Therefore I support the current ban.

As a wildlife rehabilitator who has worked hands on with wildlife for many years, I am well aware of what dogs can do to wildlife. Many of the offending dogs were with, or near to their owners at the time of the assault. Imagine what these dogs can do when they are nowhere near their owners, not to mention the non targeted species who get totally stressed when dogs are in the area, and the habitat that gets disturbed. GPS collars and tree switches are simply bad for wildlife.

Using hounds for hunting at all is disturbing. Hounds harass wildlife, which goes against department policy. Whatever happened to “fair chase”? With all the technology available to hunters these days, wildlife doesn’t stand a chance. Rules need to be tightened, not the reverse. I was surprised when the DFG Commission voted to allow GPS collars, a step in the wrong direction for such a progressive state.

Sincerely,

Sharon Ponsford,  
Sonoma County Wildlife Rescue  
California Council for Wildlife Rehabilitators

Henno Road  
Glen Ellen, California

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**From:** scientist <scientist@mountainlion.org>  
**Sent:** Tuesday, November 22, 2016 4:09 PM  
**To:** FGC  
**Subject:** Section 265, Title 14, CCR – Use of Dogs for Pursuit/Take of Mammals or for Dog Training  
**Attachments:** Section 265 Title 14 CCR – Use of Dogs for Pursuit\_Take of Mammals or for Dog Training.docx

Dear Commissioners,

Please accept the attached comments from the Mountain Lion Foundation in support of the proposed prohibition on hound GPS collar use for hunting and killing wildlife while analysis is being completed.

Thank you,  
Veronica

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Veronica Yovovich, PhD  
*Wildlife Conflict Specialist*

**Mountain Lion Foundation**

PO Box 1896  
Sacramento CA 95812  
[www.MountainLion.org](http://www.MountainLion.org)



# MOUNTAIN LION FOUNDATION

## *Saving America's Lion*

California Fish and Game Commission  
1416 Ninth Street, Suite 1320  
Sacramento, CA 95814

November 21, 2016

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Lynn Cullens

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Robert Wagner

**30**  
YEARS OF  
Saving America's Lion  
**1986 ~ 2016**

Post Office Box 1896  
Sacramento CA 95812  
www.mountainlion.org  
info@mountainlion.org  
(916) 442-2666

RE: Section 265, Title 14, CCR – Use of Dogs for Pursuit/Take of Mammals or for Dog Training

Dear Commissioners,

The Mountain Lion Foundation is writing in support of your proposed prohibition of the use of GPS collars on hounds for the pursuit of wildlife until further analysis has been provided.

Stewarding wild areas, minimizing impacts on non-target wildlife, and conducting hunting activities safely while respecting land ownership are all critical tenets of hunting ethics. Proper training and voice control are imperative for ensuring that non-target species are not harassed, maimed, or killed; private property boundaries are respected; and that hounds are steered safely out of potentially dangerous situations and areas by their houndsmen.

GPS collars allow hunters to track their hounds, but the collars do not allow hunters any greater ability to control them. GPS collars give a false sense of security and encourage hunters to let their dogs roam far out of reach. This creates a situation in which the dogs could harm wildlife, cross into properties where they are prohibited, or wander into harm's way.

Dogs that stray far from their owners are far more likely to sustain injuries, and the distance may make it more difficult to immediately treat or transport the dog for care. An injured dog on a distant hillside would be easier to find with a GPS collar, but preventing the injury under the watchful eye of the houndsman is a far better situation.

The best way to prevent these three hazards is to ensure that hounds have proper training and are within the sound of their owner's voice at all time, rendering GPS collars unnecessary. It follows that any dog that does not respond to voice commands is not sufficiently trained to be trusted to roam free. In these cases, the physical control of a leash would be a far better tool than a GPS collar.

We support a prohibition on the use of GPS collars on hounds for pursuit and killing of wildlife at this time. We are certain that gathering more data on the effects of the practice and working with responsible houndsmen will provide great insight into next steps. We urge the commission to consider all three of the concerns that we have mentioned, namely, the impact on wildlife, the potential for trespass, and the both the likelihood and severity of injury to hounds.

Thank you for your consideration.

Sincerely,

Lynn Cullens  
Executive Director  
916-606-1610  
L.Cullens@mountainlion.org

Donations are tax-deductible. The Mountain Lion Foundation is tax-exempt under IRS Section 501(c)(3) Federal ID #94-3015360, California #D-1539405

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**From:** Mjasper [REDACTED]  
**Sent:** Tuesday, November 22, 2016 3:16 PM  
**To:** FGC  
**Cc:** mjasper@accessbee.com  
**Subject:** GPS Collar amendment to Sec 265 Comment  
**Attachments:** PIC+SC-Support 265 Amdmt+Request-11-22-16.pdf

Greetings,

Please accept the attached as our comment to the Fish and Game Commission regarding the proposed amendments to the Section 265, GPS collar bans on hound hunting. Please reply to acknowledge receipt.

Thank you,  
Marilyn Jasper



PUBLIC INTEREST COALITION  
P.O. BOX 671, LOOMIS, CA 95650



[sent via email: [fgc@fgc.ca.gov](mailto:fgc@fgc.ca.gov) ]

November 22, 2016

California Fish and Game Commission  
P.O. Box 944209  
Sacramento, CA 94244

Ladies and Gentlemen:

RE: **1—Support: Proposed Amendments to Section 265: (GPS Collars/Tree Switch Ban)**

**2—Request: Include “or for dog training” to amendment and analysis plans**

First, we support the CA Fish and Game’s (FGC) proposed amendment to Section 265, Title 14, CCR, to ban GPS collars for hound hunting of mammals. We also appreciate the FGC’s intent to conduct further impact analysis which should be helpful to all.

Second, for thoroughness and consistency in the regulations, we urge the FGC to expand the amendment ban language to include dog training to hunt mammals. The regulatory text amendment language could easily be extended with the addition of four words, “or for dog training” at the end of the sentences. The two amended sections would read:

(d)(1) Treeing Switches. Electronic dog retrieval collars...are prohibited on dogs used for the pursuit/take of mammals **or for dog training**.

(d)(2) Global Positioning System Equipment. Electronic dog retrieval collars...are prohibited on dogs used for the pursuit/take of mammals **or for dog training**.

In Section 265 regulations, the phrase, “...for the pursuit/take of mammals or for **dog training**” is used not only in the title of the regulation itself, and in the ISOR titles for this and the previous amendment (April, 2016), but also in five additional separate references throughout Section 265. Thus, the common perception or understanding is that using hounds for the pursuit/take of mammals goes hand-in-hand with hound training for mammals—the two are inextricably connected. As such, it would be reasonable, reduce confusion, and ensure consistency within Section 265 by adding “or dog training” to the current amendments [Section (d)(1) and (d)(2)] as indicated above.

As the proposed analysis is conducted, the “pursuit” aspect will undoubtedly be a critical, primary focus. Because hound training is primarily focused on the pursuit, its impacts coincide with “pursuit/take” impacts. Therefore, to omit or ignore the potential impacts of dog training in any analysis, could result in skewing the impacts as a whole. To some extent, even if unintentional, when a targeted or non-targeted animal is mauled, injured, or killed in the course of the hound hunt or training, there is a resulting “take” activity in both hunting and training. This further supports the contention that both “pursuit” and “take” are elements in mammal dog training and should be included in both the proposed amendment ban and the analysis.

As a minor note: The NOP for the regulation change states under “Benefits of the regulations,” subtitle “Consistency and Compatibility with State Regulations,” (page 1) that “*Commission staff has searched the California Code of Regulations and has found no other agency with the authority to regulate the use of dogs for hunting mammals.*” Generally speaking this is correct; however, when hounds are used to hunt deer in areas where all dogs

must be on a leash (such as a number of State Park “Recreation Areas” where deer hunting is allowed), it is our understanding that State Park Rangers do enforce leash laws if they find a violation occurring. Hounds may still be used to hunt, track and follow deer scents, blood trails, etc., but they must be on a leash (aka “lead” or “tether”).

Last, the proverbial lynchpin to finally resolve GPS hound collar issues may rest with the scope of the analysis and depth and accuracy of the reports. We urge the FGC to instruct staff (or outside consultant) to thoroughly cover potential impacts involved when GPS collared dogs are used for pursuit/take of mammals (and training). Areas to be researched and evaluated should include, but not be limited to:

potential wildlife harassment	hounding trespass incidents and concerns
hound encounters with domestic pets	mortality potential of young wildlife species with hound encounters
“drive” potential of mammals with GPS collars v currently allowed radio telemetry collars	disease transmission from hounds to wildlife and vice versa; vaccination requirements for hounds
other state regulations that require hound testing for dog proficiencies and certification to be licensed for hunting or tracking purposes	high tech impacts of GPS collars when used with satellite/cell phone real time images
hound mammal hunting in other states (especially with regard to deer, “deer drives,” and/or other wildlife “spotting” impacts)	review of ethical and/or fair chase issues with hounding, including ever-increasing sophistication of high-tech equipment
hounding in known listed specie habitat	hound harassment of livestock incidents
night hound hunting impacts	hounding in known apex predator habitat)
code enforcement challenges and costs associated with hounding	starting hounds from “baited” areas
wildlife officer or game warden safety with hound hunting code enforcement activities	using GPS collars for training when other hunters are either near or in contact via cell phone or radio
survey of animal control calls (loose/lost hounds), veterinarian cases (injured hounds), hound carcass discovery reports	impact of hounding with inadequate CDFW wildlife officer staffing
feasibility or capacity of hounders’ to “intervene” (altercations, listed specie catch or harassment, etc.) when hounds have ranged out of sight	comparisons of leashed v unleashed hound hunting impacts
impacts of hounding on non-consumptive activities—wildlife photography opportunities, hiking, camping with domestic pets	consideration of potential maximum allowable “range” limits (distance between hounder and hound)
licensed hound requirements: records of vaccinations, regular veterinarian checks, micro-chipping, transfer of ownership, cause of death, etc.	impacts discussed from any other previous failed attempts to amend Sec 265 (d) (1) and (d)(2)

Again, we support the proposed amendments to ban GPS collars on hounds, urge the addition of dog training to the amendment, and greatly appreciate FGC’s work on this issue.

Thank you for considering our views,



Marilyn Jasper, Chair

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**From:** jeff  
**Sent:** Tuesday, November 22, 2016 2:08 PM  
**To:** FGC  
**Subject:** < REGARDING GPS COLLARS ON HOUNDS FOR TRAINING <

*"To the proposed amendment to Section 265, please add a ban on dog training with GPS collars."*

*Most sincerely, Jeffrey L. Wiles*

[Redacted signature line]

[Redacted signature line]



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**From:** Querido Galdo  
**Sent:** Tuesday, November 22, 2016 9:03 AM  
**To:** FGC  
**Subject:** GPS hound collar ban

To the proposed amendment to Section 265, please add a ban on dog training with GPS collars.

thanks very much,  
Q Galdo

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**From:** Linda Monday, November  
**Sent:** 21, 2016 6:38 AM  
**To:** FGC  
**Subject:** No GPS collars on hounds for training!!!!

Sent from my iPhone

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**From:** Mary Belkin                      Tuesday,  
**Sent:** November 22, 2016 6:45 AMFGC  
**To:** Proposed hound collar amendment  
**Subject:** FGC lettercollars.doc  
**Attachments:**

**Mary & Donald Belkin**

[REDACTED]  
**Redding, CA 96099**

[REDACTED]  
**Sent by Email**

November 21, 2016

Fish and Game Commission  
1416 Ninth Street, Suite #1320  
Sacramento, CA 95814

Re: NO GPS Collars on Hounds for Training

Dear Commissioners:

This email is written on behalf of the commission's proposed ban of GPS collars on hounds for pursuing/killing mammals. We are specifically, writing to request you add to the proposed amendment to Section 265, the ban on dog training with GPS collars as well.

Both hunters and trainers should keep their dogs within their sight and under their direction and control at all times to avoid negative consequences to deer and other wildlife. They should not rely on the use of devices, given an animal whose potential for adverse impacts to wildlife is so great.

The use of dogs (trained or otherwise) causes habitat avoidance by wildlife, especially deer, thus causing habitat displacement. Unlike predators, dogs don't hunt; they chase and in some cases, maul their prey, once caught.

Even when a dog makes no contact with a deer, it easily causes injury and death due to the flight nature of deer and exhaustion from being chased. The expenditure of energy to flee what is perceived as a predator may be the breaking point for individual prey animals.

When dogs are left to free range, they often end up on private lands where they are not welcome, nor are their owners welcome to retrieve them. We have had hounds end up on our rural property running deer. They were "trained hounds" and caused a broken leg and death in one case and exhaustion and death in another deer on our property. This is an unconscionable waste of wildlife and we contacted our local warden to file a complaint so there is a record of the incidents. We have also witnessed a fawn mauled by a hound who was about a half mile ahead of its owner on forest service land in the Trinity Alps.

Allowing dogs being trained to venture out of sight through use of GPS collars provides a window of opportunity for poaching. These days, it's difficult to get a warden out for  
Letter to Commission

Page 2

poaching incidents. Most seem to be involved with the eradication of marijuana. We should not expand opportunities which facilitate poaching and place an increased burden on enforcement when it's tough to find a warden as it is.

Hound handlers should maintain sight of their hounds to avoid negative consequences on the vegetation they trample.

Dogs transmit disease through their feces such as Leptospirosis and muscle cysts which can be passed to deer and thus, dogs should be prohibited from running at bay. In every other aspect of wildlife management, we are concerned with transmission of disease.

We are encouraged and commend the commission for the proposed ban on the use of GPS collars for hunting purposes, however, urge you to include a ban on GPS collars for training purposes, as well. We believe that the rules governing the use of GPS collars should be uniformly applied to hunting and training to avoid confusion by the public and for ease of enforcement purposes as well.

Thank you for considering our views.

Mary A. Belkin

Donald B. Belkin



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**From:** Patricia González Lamb  
**Sent:** Monday, November 21, 2016 10:16 PM  
**To:** FGC  
**Subject:** Proposed amendment

Please add the following:

To the proposed amendment to Section 265, please add a ban on dog training with GPS collars.”  
Thank you. Patricia Gonzalez

Sent from my iPhone

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**From:** Gayle Roller Monday,  
**Sent:** November 21, 2016 9:11 PMFGC  
**To:** Re GPS hound collar ban  
**Subject:**

To the proposed amendment to Section 265, please add a ban on dog training with GPS collars.

Gayle Rolle

---

**From:** Rob Snyder  
**Sent:** Monday, November 21, 2016 8:53 PM  
**To:** PMFGC  
**Subject:** Section 265, Title 14, CCR

To whom it may concern,

To the proposed amendment to Section 265, please add a ban on dog training with GPS collars.

Sincerely,  
Robert Snyder

---

**From:** Elizabeth Wadsworth  
**Sent:** Monday, November 21, 2016 7:44 PM  
**To:** FGC  
**Subject:** GPS collars on dogs

To the proposed amendment to Section 265, please add a ban on dog training with GPS collars.

---

**From:** Pea Ce <pea-ce@live.com>  
**Sent:** Monday, November 21, 2016 7:28 PM  
**To:** FGC  
**Cc:** Pea Ce  
**Subject:** GPS Collar Amendment comments for December's FGC  
**Attachments:** GPS Hound Collars-Support+Addition2-Dec2016.pdf

Please forward the attached comment letter to the CA Fish and Game commissioners, to be included in their packet before their December meeting.

If you can acknowledge receipt of this comment letter, it would be greatly appreciated.

Thanks,

Randall Cleveland

for the PEACE team



**P**ROTECTING **E**ARTH & **A**NIMALS **W**ITH **C**OMPASSION & **E**DUICATION

P.O. Box 846 • Newcastle, CA 95658 • [pea-ce@live.com](mailto:pea-ce@live.com)

November 20, 2016

Fish and Game Commission  
1416 Ninth St., Ste 1320  
Sacramento, CA 95814

Subj: Proposed GPS Hound Collar amendment—"Section 265, Title 14, CCR"-(Dec 8, 2016 Discussion)

The CA Fish and Game Commission is to be commended for reconsidering and amending regulations (Sec 265) to bring back the ban on GPS collars for hound hunting of mammals. Along with "coursing," which thankfully is banned in most civilized countries, hound hunting is neither ethical or even fair chase. With all the high-tech electronic paraphernalia (whether it be radio or GPS collars, tree switches, cell phones for hounders to radio GPS coordinates to hunters waiting, etc.), hound hunting needs to be banned completely as some states and other countries have done.

Along with the GPS collar ban for hunting mammals, we cannot stress strongly enough the need to also ban the use of GPS collars for hound or dog training. When dogs are let loose for "training" in wildlife habitat, those dogs can range huge distances from trainers (some GPS collars claim ranges of over ten miles). The resulting mayhem on unsuspecting wildlife is significant and severe. Trainers may know where the dogs-in-training, or already-trained dogs, are located via the GPS coordinates, but it is physically impossible for them to either get to the scene quickly or even in any kind of timely manner, or to break up altercations.

What would be best for wildlife would be to ban all GPS collars—mammal hunting as well as training—except possibly for law enforcement, or for depredation as permitted by the CDFW. Otherwise, GPS collars may be used on non-hound breeds of dogs for nefarious purposes that gravely impact wildlife and domestic pets. The internet can provide a multitude of horrific examples of such activities.

Last, contrary to dog-welfare reasons stated by the hounders to justify the need for GPS collars, hounding in and of itself is a very cruel and inhumane abuse of dogs. Hounding subjects dogs to all kinds of encounters, altercations, dumping or abandonment, and unspeakable means of disposal if/when they don't perform. As an incentive to chase prey, they are often kept hungry and at unhealthy low weights.

For now, please make an addition to the amendment to ban the use of GPS collars for hound training, and in the future, please consider banning hound hunting altogether in California

Thank you,

/S/

Randall Cleveland  
For the PEACE Team

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**From:** Sandra Williams [REDACTED]  
**Sent:** Monday, November 21, 2016 7:01 PM  
**To:** FGC  
**Subject:** ban hound collars! stop the killing!!

BAN proposed GPS hound collars (Section 265, Title 14, CCR) for dog training.”  
STOP THE KILLING!

**Sandra Williams**

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**From:** Wayne King Monday,  
**Sent:** November 21, 2016 6:53 PMFGC  
**To:** GPS collar ban  
**Subject:**

To the proposed amendment to Section 265, Please add a ban on dog training with GPS collars.

Wayne & Karin King

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**From:** D.J. L.  
**Sent:** Monday, November 21, 2016 6:10 PM  
**To:** FGC  
**Subject:** GPS hound collar ban (Section 265, Title 14, CCR)

**There should be no "analysis" needed for GPS hound collar ban (Section 265, Title 14, CCR), what is proposed is barbaric cruelty in addition to an agency that is corrupt for the special interests of the 2.3% of hunters, instead of being guardians of Wildlife for the majority of the public's interest. Fish and Wildlife agencies kill over 200 million of our wildlife a year for special interests of hunters. These agencies are structured by and run by all bloodlusting Hunters, we have to re-organize them to use real science and compassion for non-lethal management for the public's and wildlife's interest.**

**"Remember that when you leave this earth, you carry nothing that you have received -. Only what you have done"**

**Saint Francis D'Assise**

**The greatness of a nation can be judged by the way its animals are treated.**

**Mahatma Gandhi**

**Dominique Landis**



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**From:**  
**Sent:** Monday, November 21, 2016 5:46 PM  
**To:** FGC  
**Subject:** Hunting with GPS collared dogs, Section 265

To the proposed amendment Section 265 please add a ban on dog training with GPS collars.

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**From:** JP  
**Sent:** Monday, November 21, 2016 5:25 PM  
**To:** FGC  
**Subject:** Regarding the proposed GPS Hound Collar Ban (Section 265, Title 14, CCR) please ADD a ban on Dog Training with GPS Collars

To Whom This May Concern:

Our family respectfully requests that you add to the proposed GPS Hound Collar Ban the words “or for dog training.”

Thank you.

Sincerely,

Jennifer, Rudy van Zyl and family

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**From:** Elizabeth Settel  
**Sent:** Monday, November 21, 2016 5:08 PM  
**To:** PMFGC  
**Subject:** Ban GPS collars on hounds in training

Hello,

Thank you for doing the right thing by proposing a ban on GPS collars for pursuing and killing wildlife. Please add a ban on GPS collars on hounds while they are in training. Hounders should have to stay with their dogs, especially in any training, to not harass wildlife.

Untrained dogs should be kept on a leash and not released to prey on wildlife. GPS collars on untrained dogs will only stress wildlife to unhealthy limits.

Trainers or hounders should never allow hounds to range out of sight, but this is exactly what happens.

Non-targeted wildlife are at risk for being mauled, terrorized, stressed to death, chased to exhaustion, or killed by hounds before the hounder can get to the scene.

Hound hunting has no place in any ethical hunting culture.

Hounds need to be micro-chipped and not be allowed off leash—dogs can follow a scent whether they're on or off a leash.

Thank you for your careful consideration.

Sincerely,  
Elizabeth Settel

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**From:** Kayucian  
**Sent:** Monday, November 21, 2016 4:41 PM  
**To:** FGC  
**Subject:** Ban GPS collars on hounds for hunting and training

Thank you for proposing a ban on GPS collars for pursuing and killing wildlife. To the proposed amendment to Section 265, please add a ban on dog training with GPS collars. One cannot claim an ethical hunting culture if allowing dogs to terrorize wildlife.

Erin Barca

---

**From:** Kelly Collins Monday,  
**Sent:** November 21, 2016 4:20 PM  
**To:** FGC  
**Subject:** (Section 265, Title 14, CCR)

To the proposed amendment to Section 265, please add a ban on dog training with GPS collars.

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**From:** Scott Slocum  
**Sent:** Monday, November 21, 2016 3:45 PM  
**To:** FGC  
**Subject:** Limitations on GPS collars should apply to training as well as hunting.

11/21/2016

To: California Department of Fish & Game

From: Scott Slocum, Birchcrest Drive, White Bear Lake, MN 55110.

Re: Limitations on GPS collars should apply to training as well as hunting.

To the proposed amendment to Section 265, please add a ban on dog training with GPS collars.

Sincerely,  
Scott Slocum

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**From:** Lee Rudin  
**Sent:** Monday, November 21, 2016 3:18 PM  
**To:** FGC  
**Subject:** ADD to the proposed GPS hound collar ban (Section 265, Title 14, CCR) the words, "or for dog training."

**ADD to the proposed GPS hound collar ban (Section 265, Title 14, CCR) the words, "or for dog training."**

**Thank you, lee Rudin**



*Unless someone like you cares a whole awful lot, Nothing is going to get better. It's not. Dr. Seuss **The Lorax**"*



Please consider the environment before printing this email. Thank you.



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**From:** Eileen Kang  
**Sent:** Monday, November 21, 2016 1:48 PM  
**To:** FGC  
**Subject:** Ban on GPS on hounds for hunting AND TRAINING

**To the proposed amendment to Section 265:**

please add a ban on dog training with GPS collars.

I'd like to ask, what is the benefit of this type of 'sport'?  
What happened to respect for nature and the environment and animals? When did hunting for food provision turn into GPS lead slaughter?

Stop use of GPS for **any** hunting/training purpose. Stop any and ALL trophy hunting.

Sincerely yours,

Eileen S. Kang

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**From:** johanna marie mcshane >Monday,  
**Sent:** November 21, 2016 12:57 PM  
**To:** FGC  
**Subject:** Section 265 Title 14 CCR

Hello, please add a ban on dog training to Section 265 Title 14 CCR. Your proposed bill is a step in the right direction, but needs this addition. Thank you!  
Johanna McShane

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**From:** Leda H Monday,  
**Sent:** November 21, 2016 12:35 PMFGC  
**To:** Ban dog training with GPS collars  
**Subject:**

To the proposed amendment to Section 265, please add a ban on dog training with GPS collars. Protect California's wildlife and keep hunters accountable for their dogs.

Leda Huang,

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**From:** Keli Hendricks Monday,  
**Sent:** November 21, 2016 12:26 PM  
**To:** FGC  
**Subject:** GPS Ban Important

Dear Commissioners,

I am writing to strongly encourage you to not allow the use of GPS collars on hounds, and to add that they not be allowed during the training of hounds as well.

There is simply no reason hounders need to be so far from their dogs. There are no regulations or training requirements for these hounds and allowing predatory dogs to run unsupervised in wildlife habitat disrupts the lives of every living thing within miles.

Non hunters are rarely allowed to walk their dogs on leashes in the places were hunters are allowed to have their hounds running loose and chasing wild animals. Furthermore, If someone's pet chases a wild animal, it is (rightly) considered harassment of wildlife. Yet hunters and their hounds are allowed special privileges.

There is simply no way to ensure that hounds won't chase, attack, or kill the non target animals they come across, (including bears and bobcats, which is prohibited by law in CA) without a human around to give them commands, or restrain them when necessary.

As someone who works in a wildlife hospital, we see what happens when domestic dogs attack a wild animal. We have had foxes with their noses bitten off and baby raccoons torn to shreds while their mothers lay dying beside them. Even wild animals lucky enough to escape pursuing hounds can later succumb to a stress induced condition called Capture Myopathy, and it always fatal.

If hunters want to allow their hounds to chase wildlife, shouldn't they at least be required to stay in control of their dogs? This is impossible with the distances allowed by the use of GPS collars.

There is nothing sporting about a hunter sitting in a warm vehicle while their hounds harass panicked wildlife, and it certainly isn't fair chase.

To those who have never witnessed the savage results of this blood sport, hounding may seem romantic, but the reality is anything but.

Hounding is no less cruel than dog fighting or cock fighting, and allowing the use of technology to give yet another advantage to hunters (along with their dogs and advanced weaponry), makes one wonder how hounding can be seriously be considered a 'sport' at all.

Thank you for your time.

Kind Regards,

Keli Hendricks -  
Project Coyote, Sonoma County Wildlife Rescue.

**KELI HENDRICKS - PROJECT COYOTE**  
Ranching with Wildlife Coordinator

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[www.ProjectCoyote.org](http://www.ProjectCoyote.org) - 415 945-3232  
HQ Office: P.O. Box 5007 Larkspur, CA 94977  
FB: ProjectCoyote - Twitter: @ProjectCoyote

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**From:** ELM  
**Sent:** Monday, November 21, 2016 12:24 PM  
**To:** FGC  
**Subject:** To the proposed amendment to Section 265, please add a ban on dog training with GPS collars

To whom it may concern,

It is my understanding the FGC has proposed to BAN GPS collars on hounds for pursuing/killing mammals until further “analysis” is completed. This is certainly the right step, but FGC should also include a ban on GPS collars for hound “training” as well.

I therefore request that FGC ADD to its proposed GPS hound collar ban (Section 265, Title 14, CCR) the words, “or for dog training.” In other words, to the proposed amendment to Section 265, please add a ban on dog training with GPS collars.

If you can imagine untrained hounds rampaging through wildlife habitat and terrorizing species, you will understand some of the horrors of allowing GPS collars on hounds. Hounders should have to stay with their dogs, especially in any training, to not harass wildlife. While I thank FGC for doing the right thing by proposing a ban on GPS collars for pursuing and killing wildlife, please keep the following in mind:

1. Untrained dogs should be kept on a leash and not released to prey on wildlife.
2. GPS collars on untrained dogs will only stress wildlife to unhealthy limits.
3. Trainers or hounders should never allow hounds to range out of sight, but this is exactly what happens.
4. Non-targeted wildlife are at risk for being mauled, terrorized, stressed to death, chased to exhaustion, or killed by hounds before the hounder can get to the scene.
5. Hound hunting has no place in any ethical hunting culture.
6. Hounds need to be micro-chipped and not be allowed off leash—dogs can follow a scent whether they’re on or off a leash.

Thank you for your consideration of my comments on Section 265, Title 14, CCR.

Sincerely,

Edward Macan

---

**From:** Keller, Jeff  
**Sent:** Monday, November 21, 2016 11:59 AM  
**To:** FGC  
**Subject:** proposed amendment to Section 265

Dear Sirs:

Please add a ban on dog training with GPS collars to the proposed amendment to Section 265.

Thank you,  
Jeff Keller



---

**From:** Sen, Cahide  
**Sent:** Monday, November 21, 2016 11:55 AM  
**To:** FGC  
**Subject:** Please ADD to the proposed GPS hound collar ban (Section 265, Title 14, CCR) the words, "or for dog training."

Please ADD to the proposed GPS hound collar ban (Section 265, Title 14, CCR) the words, "or for dog training."

Thanks,

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**From:**  
**Sent:** Monday, November 21, 2016 11:23 AM  
**To:** FGC  
**Subject:** Anicetti. No gps collars

Staff,  
Please ADD to your proposed GPS hound collar ban (Section 265, Title 14, CCR) the words, "or for dog training."  
Thank you!

Sent from my iPhone

Mark Anicetti

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**From:** Anne  
**Sent:** Monday, November 21, 2016 11:14 AM  
**To:** FGC  
**Subject:** Please add a clear ban on dog training with GPS collars to the proposed amendment to Section 265

Thank you for proposing a ban on GPS dog collars for pursuing and killing wildlife. Banning this is the right thing to do since it will prevent dogs from hunting and chasing wildlife to exhaustion, with the human hunter coming along later, after the wildlife is caught, trapped, and/or injured, and then shooting the wildlife if it's a "catch" the hunter wants. Such hunting can't possibly be considered a fair chase.

Please add to the proposed ban a clear prohibition on GPS dog collars for training purposes as well. Trainers should have to stay with their dogs to avoid stressing, injuring, or killing wildlife.

Thank you for your attention to this important matter.

Best regards,

Anne Barr

---

**From:** Michelle MacKenzie Monday,  
**Sent:** November 21, 2016 11:12 AM  
**To:** FGC  
**Subject:** Ban GPS collars for training dogs

As a lifelong California resident and someone who is proud of the progress our state has made in protecting public lands and wildlife, I appreciate that the commission has proposed a ban on GPS collars for pursuing and killing wildlife.

I ask that you please add a ban on dog training with GPS collars to the proposed amendment to Section 265. GPS collars on untrained dogs could stress wildlife beyond endurance. Further, non-target wildlife would be at risk for being mauled or killed by dogs before the trainer could get on the scene. Hound hunting has no place in ethical hunting culture. I know that our state is better than this.

Thank you

Michelle MacKenzie

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**From:** Sonya Chan  
**Sent:** Monday, November 21, 2016 10:39 AM  
**To:** FGC  
**Subject:** ban dog training with GPS collars!

To the proposed amendment to Section 265, please add a ban on dog training with GPS collars.”

Thank you  
Sonya Chan

---

**From:** Allan Breit  
**Sent:** Monday, November 21, 2016 10:31 AM  
**To:** FGC  
**Subject:** GPS hound collar ban / request for addition to wording

Hi,

Please add to the proposed GPS hound collar ban (Section 265, Title 14, CCR) the words, "or for dog training."

Allan Breit

---

**From:** Traude Buckland  
**Sent:** Monday, November 21, 2016 10:28 AM  
**To:** FGC  
**Subject:** GPS collars

To the proposed amendment to Section 265, please ADD a ban on dog training with GPS collars.

Thank you for your consideration.

Traude Buckland

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Traude Buckland  
Home At Last Animal Rescue

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**From:** Emily Sawyer  
**Sent:** Monday, November 21, 2016 10:19 AM  
**To:** FGC  
**Subject:** Section 265, title 14

Regarding Section 265, Title 14, CCR

Fish and Game,

Thank you for proposing a ban on GPS collars for pursuing and killing wildlife.

To the proposed amendment to Section 265, please add a ban on dog training with GPS collars as well. Hounders should have to stay with their dogs, especially in any training, to not harass wildlife.

More reasons to pass a ban on GPS collars:

-Non-targeted wildlife are at risk for being mauled, terrorized, stressed to death, chased to exhaustion, or killed by hounds before the hounder can get to the scene.

-Hound hunting has no place in any ethical hunting culture.

-Hounds should not be allowed off leash—dogs can follow a scent whether they're on or off a leash.

-Trainers or hounders should never allow hounds to range out of sight, but this is exactly what happens.

Thank you,  
Emily Sawyer

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**From:** EA High  
**Sent:** Monday, November 21, 2016 10:08 AM  
**To:** FGC  
**Subject:** Proposed GPS hound collar ban Section 265, Title 14, CCR

Please ADD to your proposed GPS hound collar ban the words, "or for dog training." Hounders should have to stay with their dogs, especially in any training, to not harass wildlife. The Dark Ages are over - there is NO excuse for cruelty.

Sincerely,  
Eleanor High

---

**From:** Jim Wilson  
**Sent:** Monday, November 21, 2016 10:00 AM  
**To:** FGC  
**Subject:** GPS Collars on Hunting Dogs

FGC,

Thank you for stopping the use of GPS collars on hunting dogs. Please add language that also bans GPS collars on dogs in training. Any hunting of wild game must be regulated to limit and protect all wildlife in harms way. More technological advantages for the hunter have no place in hunting. The hunter already enjoys unfair advantage by possessing firearms, and many other accessories.

Respectfully,  
Jim Wilson

---

**From:** Mike Berg  
**Sent:** Monday, November 21, 2016 9:52 AM  
**To:** FGC  
**Subject:** Proposed amendment to Section 265, please add a ban on dog training with GPS collars.

To the proposed amendment to Section 265, please add a ban on dog training with GPS collars.

Thank you,  
Mike Berg

---

**From:** Elena Ennouri  
**Sent:** Monday, November 21, 2016 9:43 AM  
**To:** FGC  
**Subject:** Proposed Amendment Sect 265, ADD Ban on Dog Training with GPS Collars

Dear Commissioners:

I want to express my gratitude for your proposed ban on GPS collars on hounds for pursuing/killing mammals. This is certainly the right step, but could you also please add a ban on GPS collars for hound “training” as well.

- Untrained dogs should be kept on a leash and not released to prey on wildlife.
- GPS collars on untrained dogs will only stress wildlife to unhealthy limits. Trainers or hounders should never allow hounds to range out of sight, but this is exactly what happens.
- Non-targeted wildlife are at risk for being mauled, terrorized, stressed to death, chased to exhaustion, or killed by hounds before the hounder can get to the scene.
- Hounds should be micro-chipped and not be allowed off leash—dogs can follow a scent whether they’re on or off a leash.

The above bullets emphasize how critically important it is to add to the proposed amendment to Section 265 - a ban on dog training with GPS collars.

Respectfully  
Elena Ennouri

---

**From:** Susan Bradford  
**Sent:** Monday, November 21, 2016 9:38 AM  
**To:** FGC  
**Subject:** ban GPS collars on dog training!

To the proposed amendment to Section 265, please add a ban on dog training with GPS collars.”

---

**From:** a purpura  
**Sent:** Monday, November 21, 2016 9:08 AM  
**To:** FGC  
**Subject:** Ban Gps collars

To the proposed amendment to Section 265, please add a ban on dog training with GPS collars

Thank you  
Amy Purpura

---

**From:** DSL IMAP Acct  
**Sent:** Monday, November 21, 2016 9:04 AM  
**To:** FGC  
**Subject:** PLEASE NO GPS COLLARS on HOUNDS for TRAINING

To the proposed amendment to Section 265, please add a ban on dog training with GPS collars.

Thank you very much,  
Gail Gordon

---

**From:** flynn  
**Sent:** Monday, November 21, 2016 8:55 AM  
**To:** FGC  
**Subject:** no gps collars on hounds

Please do the right thing and Ban the use of theses collars “for training” Protect what little we have left of the natural habitat.. Let the “spot” hunters man up and do it themselves

---

**From:** Katayoon Zandvakili  
**Sent:** Monday, November 21, 2016 8:53 AM  
**To:** FGC  
**Subject:** Re: Proposed Amendment Section 265, ban on GPS dog collars

Dear Commissioners:

I am writing to kindly ask that you *add* to the proposed GPS hound collar ban (proposed amendment Section 265, Title 14, CCR) a ban on dog *training* with GPS collars as well.

Thank you for your consideration.

Respectfully,  
Katayoon Zandvakili

---

**From:** Yvette Fallandy  
**Sent:** Monday, November 21, 2016 8:47 AM  
**To:** FGC  
**Cc:** Change.org  
**Subject:** Hunting in California and Untrained Dogs

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Flagged

Ladies and Gentlemen:

Thank you for doing the right thing by proposing a ban on GPS collars for pursuing and killing wildlife.

As for untrained dogs:

- Untrained dogs should be kept on a leash and not released to prey on wildlife.
- GPS collars on untrained dogs will only stress wildlife to unhealthy limits.
- Trainers or hounders should never allow hounds to range out of sight, but this is exactly what happens.
- Non-targeted wildlife are at risk for being mauled, terrorized, stressed to death, chased to exhaustion, or killed by hounds before the hounder can get to the scene.
- Hound hunting has no place in any ethical hunting culture.
- Hounds need to be micro-chipped and not be allowed off leash—dogs can follow a scent whether they're on or off a leash.

Please continue to do the right thing for wild life in our great state of California.

Yvette M. Fallandy

---

**From:** Alicia Jackson  
**Sent:** Monday, November 21, 2016 8:26 AM  
**To:** FGC  
**Subject:** Ban on GPS on dogs for hunting

Please add training to the ban as well! Thanks!

Sent from my iPhone

---

**From:** p farnham  
**Sent:** Monday, November 21, 2016 8:19 AM  
**To:** FGC  
**Subject:** amendment to section 265

To the proposed amendment to Section 265, **please add a ban on dog training with GPS collars.**

Adding advanced technology to make it easier to find and kill deer and other wild life does not seem very "sportsman" like. And if hunting is a sport, then it should not become so technically sophisticated that it takes all the sport out of it. This sort of thing is akin to shooting animals from helicopters. Is that legal?

Thank you

---

**From:** Jane McGraw  
**Sent:** Monday, November 21, 2016 8:10 AM  
**To:** FGC  
**Subject:** No GPS collars on hounds Section 265, Title 14, CCR

To the proposed amendment to Section 265, please add a ban on dog training with GPS collars.

Thank you.

Jane McGraw

---

**From:** Max King Cap  
**Sent:** Monday, November 21, 2016 8:08 AM  
**To:** FGC  
**Subject:** No dog training with GPS collars.

Dear FGC,

Because of the certain risk to other wildlife I respectfully ask that you please *ADD* to your proposed GPS hound collar ban (Section 265, Title 14, CCR) the words, “or for dog training.”

In addition to the dangers to wild life and people from unrestrained dogs it is manifestly unsportsmanlike. With this in mind please add a ban on dog training with GPS collars to the proposed amendment to Section 265.

Respectfully yours,

Max

Max King Cap

---

**From:** Debra Sands  
**Sent:** Monday, November 21, 2016 7:50 AM  
**To:** FGC  
**Subject:** Please read

Please ADD to the proposed GPS hound collar ban (Section 265, Title 14, CCR) the words, "or for dog training."

We need to protect wildlife. Our natural resources are vanishing due to the selfishness of human beings.

Sent from my iPhone

---

**From:** DEBBIE HOFFMAN  
**Sent:** Monday, November 21, 2016 7:42 AM  
**To:** FGC  
**Subject:** Add "or for dog training" to proposed GPS hound collar ban

To whom it may concern:

I hope you will consider this addition to the proposed GPS hound collar ban (Section 265, Title 14, CCR), the words "or for dog training". It is essential.

Thank you.  
Debbie Hoffman

---

**From:** Leah Quenelle  
**Sent:** Monday, November 21, 2016 7:34 AM  
**To:** FGC  
**Subject:** Section 265, Title 14, CCR No GPS collar for dog training

Good day,  
To the proposed amendment to Section 265, please add a ban on dog training with GPS collars.  
Thank you for considering my comments,  
Leah Quenelle

---

**From:** Hans Huth  
**Sent:** Monday, November 21, 2016 7:32 AM  
**To:** FGC  
**Subject:** GPS collars on hounds.

Thank you for holding off the GPS collars on hounds for pursuing / killing mammals until further studies are conducted. This should also include a ban on the GPS collars for hound training.

This whole idea is wrong. As usual, we keep on interfering with the balance in nature.

We already have clear results showing the consequences that our ignorant decisions in the way we approach nature's balance can be extremely negative for the human animal species.

Instead of killing other species, let's find a way to live in harmony with nature and its creatures.

That is the objective your service was created and is paid with our tax dollars for. Mainly because the more damage to nature and its creatures we do the more we accelerate our own extinction. We are just one more animal species but with loads of ignorance and arrogance working against our own survival.

The GPS collars either for pursuing/killing or training the hounds are the wrong approach. And if you have any doubts think how much damage you are doing to the future of your children's world.

Respectfully,  
Graciela Huth

Sent from my iPad

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**From:** nried  
**Sent:** Monday, November 21, 2016 7:28 AM  
**To:** FGC  
**Subject:** To the proposed amendment to Section 265, please add a ban on dog training with GPS collars.

Please ADD to their proposed GPS hound collar ban (Section 265, Title 14, CCR) the words, “or for dog training.”

To the proposed amendment to Section 265, please add a ban on dog training with GPS collars.

Thank you.

Sincerely,  
Nichelle Lee

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**From:** carey hannigan  
**Sent:** Monday, November 21, 2016 7:16 AM  
**To:** FGC  
**Subject:** Amendment 265

To whom it may concern,

To the proposed amendment to Section 265, please add a ban on dog training with GPS collars.  
Thank you.

Carey Hannigan, DVM

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**From:** RoseMarie LoGiudice  
**Sent:** Monday, November 21, 2016 7:09 AM  
**To:** FGC  
**Subject:** Collars on hounds for training

Please add to proposed GPS hound collar ban (section 265, title 14, ccr) the words " OR DOG TRAINING."  
Thank you.

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**From:** Georgia Brewer  
**Sent:** Monday, November 21, 2016 7:03 AM  
**To:** FGC  
**Subject:** GPS Hound Collar Ban: Add Words "or for dog training"

Dear Commissioners:

Thank you for proposing a ban on GPS collars for pursuing and killing wildlife

But please ADD the words, "or for dog training" to your proposed GPS hound collar ban (Section 265, Title 14, CCR).

Untrained dogs should be kept on a leash and not released to prey on wildlife.

Non-targeted wildlife are at risk for being mauled, terrorized, stressed to death, chased to exhaustion, or killed by hounds before the hounder can get to the scene.

Thank you.

Sincerely,  
Georgia Brewer

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**From:** Joleen Belle  
**Sent:** Monday, November 21, 2016 6:55 AM  
**To:** FGC  
**Subject:** GPS ON HOUNDS IN TRAINING

Please put a ban on GPS on Hounds training Don't let them roam free killing all kinds of wildlife.  
Thanks you!  
Joleen

Sent from my iPhone

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**From:** Sharon  
**Sent:** Monday, November 21, 2016 6:46 AM  
**To:** FGC  
**Subject:** Stop GPS Hound Hunting of Deer in California

CA Fish and Game:

To the proposed amendment to Section 265, please add a ban on dog training with GPS collars.

Your attention to this issue is much appreciated and I hope you will enact this measure to protect California wildlife from the kind of harassment, stress, chase to exhaustion and death that can result from the use of GPS collars in hunting. Hunters should be made to hone and utilize their personal skills if they want to kill wildlife and should not be allowed to use technology instead. It's supposed to be a sport, not a slaughter.

Thank you,  
Sharon Hill

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**From:** Dianne Scott  
**Sent:** Monday, November 21, 2016 6:31 AM  
**To:** FGC  
**Subject:** Ban on GPS collars for dogs in training

Thank you for supporting the ban on GPS collars. Please include in you proposal a ban on these collars while dogs are in training.

Untrained dogs should be kept on a leash and not released to prey on wildlife.

GPS collars on untrained dogs will only stress wildlife to unhealthy limits.

Trainers or hounders should never allow hounds to range out of sight, but this is exactly what happens.

Non-targeted wildlife are at risk for being mauled, terrorized, stressed to death, chased to exhaustion, or killed by hounds before the hounder can get to the scene.

Hound hunting has no place in any ethical hunting culture.

Hounds need to be micro-chipped and not be allowed off leash—dogs can follow a scent whether they're on or off a leash.

Thanks for your wonderful, continued support on this issue.

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**From:** Sheryl  
**Sent:** Monday, November 21, 2016 6:23 AM  
**To:** FGC  
**Subject:** Cruel and appalling - no GPS on collars

Now the FGC has proposed to BAN GPS collars on hounds for pursuing/killing mammals until further “analysis” is completed. This is certainly the right step, but they should have also included a ban on GPS collars for hound “training” as well.

Please ADD to the proposed GPS hound collar ban (Section 265, Title 14, CCR) the words, “or for dog training.”

“To the proposed amendment to Section 265, please add a ban on dog training with GPS collars.”

Thank you  
Sheryl Mears

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**From:** alanna abbott  
**Sent:** Monday, November 21, 2016 5:54 AM  
**To:** FGC

To the proposed amendment to Section 265, please add a ban on dog training with GPS collars.”  
Thank you for proposing a ban on GPS collars for pursuing and killing wildlife.

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**From:** Barbara Doll  
**Sent:** Monday, November 21, 2016 5:04 AM  
**To:** FGC  
**Subject:** Please – no GPS collars on hounds for training

Thank you for doing the right thing by proposing a ban on GPS collars for pursuing and killing wildlife,

Additionally, To the proposed amendment to Section 265, please add a ban on dog training with GPS collars.”

Thank you for all that you do,

Barbara Doll

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**From:** GRADY JAMES PADGETT  
**Sent:** Monday, November 21, 2016 4:54 AM  
**To:** FGC  
**Subject:** GPS collars on hounds used to hunt mammals in California

Dear FGC;

To the proposed amendment to Section 265, please add a ban on dog training with GPS collars.

Respectfully,

Grady Padgett

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**From:** Stephanie Feyne  
**Sent:** Monday, November 21, 2016 4:04 AM  
**To:** FGC  
**Subject:** Ban dog training with GPS collars

To the proposed amendment to Section 265, please add a ban on dog training with GPS collars.

The FGC has proposed to BAN GPS collars on hounds for pursuing/killing mammals until further “analysis” is completed. This is certainly the right step, but they should have also included a ban on GPS collars for hound “training” as well.

Please ADD to your proposed GPS hound collar ban (Section 265, Title 14, CCR) the words, “or for dog training.”

Thank you,

Stephanie Feyne

Typos courtesy iPhone

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**From:** Joyce Schwartz  
**Sent:** Monday, November 21, 2016 2:08 AM  
**To:** FGC  
**Subject:** proposed GPS hound collar ban

“To the proposed amendment to Section 265, please add a ban on dog training with GPS collars.”

Joyce Schwartz

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**From:** Gara Spiegelhauer  
**Sent:** Monday, November 21, 2016 1:16 AM  
**To:** FGC  
**Subject:** Ban GPS collars for hunting AND TRAINING

Dear Sirs:

To the proposed amendment to Section 265, Title 14, CCR, please add a ban on dog training with GPS collars.”  
Non-targeted wildlife are at risk for being mauled, terrorized, stressed to death, chased to exhaustion, or killed by hounds before the hounder can get to the scene.  
Untrained dogs should be kept on a leash and not released to prey on wildlife.  
GPS collars on untrained dogs will only stress wildlife to unhealthy limits.  
Trainers or hounders should never allow hounds to range out of sight, but this is exactly what happens.  
Hounds need to be micro-chipped and not be allowed off leash—dogs can follow a scent whether they’re on or off a leash.  
Hound hunting has no place in any ethical hunting culture.  
Sincerely  
Gara Spiegelhauer

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**From:** josephine louie  
**Sent:** Monday, November 21, 2016 1:10 AM  
**To:** FGC  
**Subject:** request for amendment to Section 265

I respectfully request that proposed amendment to Section 265, to include a ban on dog training with GPS collars. Please ADD to the proposed GPS hound collar ban (Section 265, Title 14, CCR) the words, “or for dog training.”

Thank you.

Jo Chen  
Life long California Resident