Tracking Number: (**2026-16**)

To request a change to regulations under the authority of the California Fish and Game Commission (Commission), you are required to submit this completed form to: California Fish and Game Commission, (physical address) 1416 Ninth Street, Suite 1320, Sacramento, CA 95814, (mailing address) P.O. Box 944209, Sacramento, CA 94244-2090 or via email to FGC@fgc.ca.gov. Note: This form is not intended for listing petitions for threatened or endangered species (see Section 670.1 of Title 14).

Incomplete forms will not be accepted. A petition is incomplete if it is not submitted on this form or fails to contain necessary information in each of the required categories listed on this form (Section I). A petition will be rejected if it does not pertain to issues under the Commission's authority. A petition may be denied if any petition requesting a functionally equivalent regulation change was considered within the previous 12 months and no information or data is being submitted beyond what was previously submitted. If you need help with this form, please contact Commission staff at (916) 653-4899 or FGC@fgc.ca.gov.

SECTION I: Required Information.

Please be succinct. Responses for Section I should not exceed five pages

1. Person or organization requesting the change (Required)

Name of primary contact person: Bill Leikam
Address: [redacted]
Telephone number: [redacted]
Email address: [redacted]

2. Rulemaking Authority (Required) - Reference to the statutory or constitutional authority of the Commission to take the action requested:

The Commission has authority to regulate the taking of fur-bearing mammals, including gray fox, under Fish and Game Code §§200, 203, and 265, and Division 4, Part 3, Chapter 2 (§§4000–4012), which establishes gray fox as a fur-bearing mammal subject to Commission-adopted take regulations under Title 14, §461. This same authority supports directing the Department to develop a gray fox population monitoring protocol as a basis for sound management of a species currently regulated without a statewide population baseline.

3. Overview (Required) - Summarize the proposed changes to regulations

This petition seeks three related actions specific to gray fox:

(1) that the Commission direct the California Department of Fish and Wildlife (CDFW) to develop a **gray fox population monitoring protocol**; and
(2) that Title 14, §461 be amended to **require reporting** of all gray fox take, including regulated hunting season take, depredation/nuisance kills, and take by state or local agency staff; and
(3) that CDFW pilot a voluntary citizen-science archery hunter survey, modeled on Illinois' Archery Deer Hunter Survey (ADHS, established 1991), as a low-cost complement to formal monitoring.

4. Rationale (Required) - Describe the problem and the reason for the proposed change:

Gray fox in California are present enough to be taken for granted, and unmonitored enough to be invisible. The species is widely assumed to be stable, but that assumption rests on no current data: California has not conducted a statewide gray fox population assessment since 1984.

That gap has consequences beyond the abstract. UWRP has documented gray fox at the Palo Alto Baylands for more than fifteen years. In late 2016, canine distemper wiped out the entire local population of approximately 17 individually known foxes. Nearly a decade later, they have not returned. That collapse was documented only because a dedicated volunteer effort happened to be watching. Whether similar losses have occurred, or are occurring, elsewhere in the state is unknown — because no comparable monitoring exists anywhere else.

Gray fox are currently classified as a furbearer with a hunting season (November 24–end of February) and no bag limit, but no reporting requirement applies to gray fox taken by firearm, bow, or dogs — the primary legal methods of take. Reporting under Title 14, §467 attaches only to trapping licenses, and even then the data collected (fur sales, buyer names, county of take) is structured for fur-commerce tracking, not population monitoring. Depredation, nuisance, and agency take of gray fox fall outside this reporting structure entirely.

This is not a novel standard to apply, and gray fox is not being asked to meet a bar nothing else meets — it is falling through a gap between existing standards. Big game species have dedicated population modeling funded by tag revenue. Bobcat, a comparably situated furbearer, is subject to a statutory population-based management plan under Fish and Game Code §4158 before any hunting season may open. Gray fox qualifies for neither pathway: it generates no tag revenue, and no legislation has ever extended bobcat-style requirements to it. The result is a species regulated with less data and less oversight than almost anything else the Commission manages.

A single new form would close this gap. A Gray Fox Take Report, completed annually by hunters, trappers, depredation/nuisance permittees, and state or local agency staff, would for the first time capture every category of gray fox mortality in one place — replacing a structure where most take goes entirely unrecorded. Both requested actions are administrative and data-focused, targeted specifically to gray fox — they do not propose new take restrictions — and would close a forty-year-old gap using the same population-data standard the Commission and Department already apply elsewhere.

A low-cost, voluntary model exists and could be useful in California. Illinois has run its Archery Deer Hunter Survey for 35 years: bow hunters voluntarily log hours afield and wildlife sightings — not kills — during deer season, and the state converts that into long-term relative-abundance trend data for several species, gray fox included. The model works because it treats hunters' field observations as legitimate scientific input rather than compliance data, asking for voluntary participation rather than imposing a new obligation. This is not a novel posture for California to adopt: hunters and trappers have historically identified wildlife population changes in the field well before formal studies catch up, and treating that field knowledge as an asset is part of what has made comparable efforts successful elsewhere. UWRP proposes CDFW pilot a similar voluntary sighting survey for California archery hunters as a complement to — not a substitute for — the mandatory take-reporting requested above.

SECTION II: Optional Information

5. Date of Petition: August 18, 2026

6. Category of Proposed Change

☐ Sport Fishing
☐ Commercial Fishing
☒. Hunting
☐ Other, please specify: Click here to enter text.

7. The proposal is to: (*To determine section number(s), see current year regulation booklet or https://govt.westlaw.com/calregs*)

☒ Amend Title 14 Section(s): add a take-reporting requirement covering all categories of gray fox mortality (hunting, depredation/nuisance, agency take
☐ Add New Title 14 Section(s): Click here to enter text.
☐ Repeal Title 14 Section(s): Click here to enter text.

8. If the proposal is related to a previously submitted petition that was rejected, specify the tracking number of the previously submitted petition Click here to enter text.
Or ☒ Not applicable.

9. Effective date: If applicable, identify the desired effective date of the regulation.
If the proposed change requires immediate implementation, explain the nature of the emergency:

No emergency basis; standard rulemaking timeline is appropriate. Alignment with the start of the next hunting season (November 2027) would give CDFW lead time to stand up reporting infrastructure.

10. Supporting documentation: Identify and attach to the petition any information supporting the proposal including data, reports and other documents:

Please attach our report "Status, Signals & Data Gaps: The California Gray Fox" published May 28, 2026 and available here: https://urbanwildliferesearchproject.org/wp-content/uploads/2026/07/Signs-Signals-and-Data-Gaps-The-CA-Gray-Fox-May-28-2026.pdf

11. Economic or Fiscal Impacts: Identify any known impacts of the proposed regulation change on revenues to the California Department of Fish and Wildlife, individuals, businesses, jobs, other state agencies, local agencies, schools, or housing:

Anticipated fiscal impact to CDFW is modest. The Department's existing Automated License Data System (ALDS) already processes annual trapping reports under §467; adding a gray fox take-reporting requirement would extend this existing infrastructure rather than build new systems. Comparable precedent: CDFW already assesses a non-reporting fee (approximately $21.60) for big game tag holders who fail to report harvest by deadline — a self-funding compliance mechanism that could be applied here at no net cost to the Department. Based on the scale of CDFW's existing trapping-report and bear-tag-report programs, one-time form design and database field costs are estimated in the low tens of thousands of dollars, with ongoing administration folded into existing licensing operations. Impact to individuals is limited to the time required to complete an annual report, consistent with existing requirements for trappers and big game tag holders. No impact to housing, schools, or local agency budgets is anticipated; state and local agency staff conducting depredation or nuisance take would incur a minor added reporting step within existing operational duties.

The voluntary sighting survey adds minimal cost beyond the take-reporting system described above: no compliance mechanism is needed, and Illinois' 35-year program demonstrates the format can run on existing agency capacity once established.

12. Forms: If applicable, list any forms to be created, amended or repealed:

We propose CDFW develop a **Gray Fox Take Report**, modeled on the existing Trapping Report (DFW 1389a) and big game report card formats, to be completed annually by:

- Licensed hunters/trappers who take gray fox
- Holders of depredation or nuisance-take permits/authorizations covering gray fox
- State or local agency staff who take gray fox in an official capacity

Suggested fields:

- Reporting party type (licensed hunter, licensed trapper, depredation permittee, state agency staff, local agency staff)
- Date of take
- County/location of take
- Method of take (firearm, bow and arrow, dogs, trap)
- Category of take (regulated hunting season / depredation or nuisance / agency management action)
- Sex, if known
- Reason for take, if depredation/nuisance or agency action

A report would be required even if no gray fox were taken under that authorization in a given year, consistent with the existing trapping report standard.

In addition to the mandatory Gray Fox Take Report described above, UWRP proposes CDFW pilot a **Voluntary Gray Fox Sighting Survey** for licensed archery hunters, modeled on Illinois' ADHS. Unlike the take report, this survey would be optional and would capture sightings, not kills.

Suggested fields:

- Hunter ID/license number (optional, for duplicate tracking)
- Date and county of observation
- Hours afield that outing
- Number of gray fox observed
- Behavior notes (optional, free text)
- Season/year

Because participation is voluntary and modeled on an existing, low-administrative-burden format, CDFW could pilot this without new statutory authority — potentially as a Department-initiated program rather than a regulation change, run in parallel to the Commission's action on the mandatory items above.

SECTION 3: FGC Staff Only

Date received: **8/18/2026**

FGC staff action:

- ☑ Accept - complete
- ☐ Reject - incomplete
- ☐ Reject - outside scope of FGC authority

Tracking Number

Date petitioner was notified of receipt of petition and pending action: _____

Meeting date for FGC consideration: _____

FGC action:

- ☐ Denied by FGC
- ☐ Denied - same as petition _____
  Tracking Number
- ☐ Granted for consideration of regulation change