



March 22, 2020

The Honorable Evan Low, Chair
Assembly Business and Professions Committee
1020 N Street, Room 379
Sacramento, CA 95814

RE: AB 2691 (Bauer-Kahan) – OPPOSE

Dear Assembly Member Garcia:

The California Waterfowl Association (CWA) respectfully requests that you oppose AB 2691 (Bauer-Kahan), which would put various requirements on dog training facility operators, the violation of which would be subject to criminal and civil penalties.

This bill is a solution largely in search of a problem. Most reasonable dog owners who are willing to pay considerable sums of money to have their dog professionally trained (e.g. for bird hunting purposes) will also initially inspect the training/housing facilities and have substantial conversations with the trainer/operator about their dog's care and well-being before dropping their dog off. It is also in the trainer/operator's financial interest for the dog to be properly cared for, since the facility's reputation will affect overall business.

While some of AB 2691's requirements are reasonable and it would be expected that current dog training facility operators are already fulfilling them, others are subjective or even arbitrary. For example, a dog training facility operator would be required to ensure that "pests do not inhabit any part of the facility in a number large enough to be ...annoying to the dogs." In addition, AB 2691 provides that "A dog may be contained in a temporary enclosure for a period not to exceed 4 hours during the day and 12 hours at night or a length of time that is humane for that particular dog..."

Furthermore, the bill requires that methods of training "will not hurt...the dog". Depending on the opinion, for example, of an individual animal control or humane officer, this could preclude the use shock collars or other commonly used methods which rely on stimulation or restraint in order for the dog to obey a command. In the case of hunting, these methods not only help

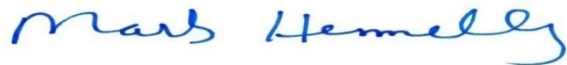
teach hunting skills, but also can be necessary for the dog's own safety (e.g. when hunting near public roads).

Please note that there is no minimum number of dogs trained that would trigger the bill's requirements. Dog training facility operators who accept even one or two dogs for a day's training, for example, would be forced to comply with all of the proposed rules and requirement under the bill. This could therefore particularly raise costs for small-scale facilities.

It should also be noted that the bill doesn't just authorize criminal penalties, but civil penalties as well. The threat of such financial penalties, coupled with the other costs of compliance with AB 2691, would likely compel some dog training operators to cease their business entirely.

For these reasons, please oppose this measure when it is considered by your committee.

Sincerely,



Mark Hennelly, Vice President of Legislative Affairs and Public Policy
California Waterfowl Association

cc: Members, Assembly Business and Professions Committee
The Honorable Rebecca Bauer-Kahan, Assemblymember, 16th District