

Private Property Rights Versus the Rights of Public Domain

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Abstract: This research project examines traditions and cultures in Florida supporting the rights of private property ownership and the harvest of game or fish, whose ownership is common to all. The conflicts which arise from these deeply held values will be identified and discussed. This study presents the results of a questionnaire administered to wildlife law enforcement officers and interviews conducted with property owners and wildlife resource users throughout the State of Florida. This study will examine, from a current and historical perspective, the steps taken by the Florida Game and Fresh Water Fish Commission (GFC) to resolve conflicts.

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Florida is currently one of the fastest growing states in our nation. From Florida's Everglades to the rural Northwest Panhandle, communities are affected by this urbanization (Burnett 1986). Communities that were once considered small towns are now population centers with all of the problems associated with a large number of people. One aspect of growth seldom noticed by the urban community is the loss of undeveloped properties, lakes, and streams previously available to the public for hunting and fishing.

Prior generations of native Floridians took for granted the availability of these areas. They assumed that these opportunities would exist for future generations. However, increased property values resulted in significant acreage being converted from undeveloped forest or timberland to residential areas. This land-use change has sometimes resulted in bitter conflict between property owners and hunters and fishermen. Property owners assert their legal right to govern the use of their property. This includes protection against hunters/fishermen who enter or otherwise use their property without permission (Heinz 1995). On the other hand, some hunters/fishermen reason that, by virtue of the ownership of wildlife (aquatic and wild animal life all inclusive) having been titled or vested to the state, it is common property. Wildlife's value, regardless of physical location, is for the common good of all citizens (Foster 1995). Therefore, some believe wildlife classified as "legal game" should be subject to harvest on any property, posted or otherwise, although this is contrary to existing Florida law.

These 2 diverse cultures, with their respective, deeply held values, can conflict. Ten hunters, 5 fishermen, and 13 property owners were interviewed to determine what problems occur when hunters or fishermen infringe upon the rights of private property owners, how incidents occur, and who is affected.

An examination of the relevant Florida laws, as well as a written survey, were used to determine what legal tools are available to address problems.

Articles from rural newspapers account for most of the documentation concerning this conflict. Historical perspective is difficult to locate, except in the archives of the GFC. Some evidence exists that other states have experienced in the past, or are currently experiencing, similar problems (Draper 1995, Hyer 1995, Moore 1983).

The challenge for the GFC will be to maintain lawful hunting and fishing opportunities, while insuring an acceptable degree of protection for private property rights.

Methods

The mission of the GFC is to manage freshwater aquatic life and wild animal life and their habitats to perpetuate a diversity of species with densities and distributions that provide sustained ecological, recreational, scientific, educational, aesthetic, and economic benefits. To carry out its mission, the GFC maintains 5 regional offices. The ascending law enforcement management structure at the regional level is comprised of 7 to 9 lieutenants, 3 captains, and 1 major.

To assess the statewide significance of the conflict, input was needed from each region. To accomplish this, a questionnaire containing 18 questions was developed. The questions were selected to determine how widespread this issue actually is and to identify solutions. The questionnaire contained 7 questions which required a narrative response. These 7 questions were responsible for most of the omissions or incomplete surveys.

The questionnaire was sent to 41 GFC lieutenants throughout the State of Florida. The rank of lieutenant was chosen not only because it is the first-line supervisor, but it was anticipated that the supervisor would discuss the questions with the wildlife officers who could provide field viewpoint. The questionnaire was also sent to the regional commanders in each region. Their perspective was essential since they would be best qualified to provide an overview of this issue for their respective region. Due to the volume of public complaints regarding dog hunting during the study, many wildlife officers in the Northwest Region had been assigned to temporary duty in the Blackwater Wildlife Management Area (an area where the conflict had become heated) or other high complaint areas. Therefore, 16 northwest regional wildlife officers were randomly selected to receive the questionnaire. Their assignment provided valuable insight into the issue.

The last part of the survey instrument solicited the name of at least 1 hunter, 1 fisherman, and 1 landowner who might participate in a personal interview to provide a nongovernmental perspective. The personal interviews were designed to determine the impact of this issue on the affected cultures. The same questions were posed to each of the 28 respondents.

The relevant Florida Statutes were reviewed to determine current Florida law regarding hunting and fishing and private property ownership rights. Most GFC records outline incidents and agency reaction relative to northwest Florida. Newspaper articles chronicled the conflict in the Florida Panhandle during the early 1980s. Publications relating to the topic of this research were reviewed. A case study conducted in 1981 in Piedmont, Virginia, was reviewed for similarities.

The weakness in the research literature was that most pertained to the Northwest Florida Region. Another bias that might exist is the time of year that agency personnel received the questionnaire. November through February is the time that problems with dog hunters might be the greatest. Law enforcement officers would be spending a great deal of time responding to public complaints relative to trespass hunters. This would have an affect on the officers' objectivity toward this entire user group.

Results and Discussion

Sixty-one questionnaires were sent out and 49 were returned, an 80% return. The exceptional rate of return should lend substance to the results of this study. The results showed that the issue of private property abuses (e.g., trespassing, littering) by hunters and fishermen affected each of the 5 regions in Florida. Private property abuse is defined as a commission of an act whether intentional, negligent or otherwise, which results in the unauthorized use or misuse of real property.

Forty-six of the respondents indicated that conflicts occur frequently or occasionally within their region. Only 3 of the respondents indicated that conflicts seldom or never occur. Thirty-one respondents felt that the conflicts involve both hunters and fishermen, while 17 felt that only hunters were involved. Every respondent felt that trespassing was involved in the conflicts. Thirty-three of the respondents felt that the conflicts were confined to a specific area. Fifteen felt the conflicts were rarely or never confined to a specific area. Thirty-nine officers responded that they did interact with other law enforcement agencies while 9 indicated otherwise. Twenty-seven officers indicated they did not have either formal or informal agreements with other law enforcement agencies regulating arrest and prosecution authority. Sixteen indicated they did. Although 27 officers indicated that they had no agreement with local agencies, 26 officers described some form of agreement. Responses range from structured agreements to what could best be described as understandings as to how the public complaints would be handled. Twenty-one officers felt the agreements were effective, while 3 felt they were not. Twenty-three officers responded with suggestions to improve the agreements. The results of the responses indicated that the conflict encompassed multiple counties, but the conflict was more noticeable in the rural areas. Forty-seven officers offered opinions as to why hunters and fishermen infringed upon the property rights of others. The respondents were almost evenly divided as to whether the current laws were adequate. Only 2 officers indicated that there were no areas open to the general public for hunting and fishing in their areas of responsibility.

Twenty-nine interviews were conducted with individuals throughout Florida. All but 1 were conducted telephonically. Each of the 5 regions were represented in

the interviews. The results of the interviews suggest that infringement of private property rights was significant in rural Florida. Twenty-four of the interviewees responded that they knew of private property infringement involving hunters or fishermen. Every landowner who was interviewed reported that they had personally experienced problems with unauthorized hunters/fishermen. Most abuses involved hunters or fishermen and were reported to a law enforcement agency. Seven property owners stated they had been threatened or intimidated by hunters or fishermen. Surprisingly, only 4 of the landowners felt that the current laws were inadequate to address this problem. All but 5 of the landowners reported that their property was posted, either by signs or fencing. Responses from the hunters and fishermen indicated that most believed there were adequate places open to the public for hunting and fishing. The hunters and fishermen were unanimous in their support of a landowner's right to authorize the taking of game or fish on private property.

Florida Statute, Chapter 810, entitled "Burglary and Trespass, clearly prohibits a person from entering the property of another without being authorized, invited, or licensed. In fact, if the offender is armed during the trespass, the trespasser is guilty of a third degree felony (1994 Supp. to Fla. Statutes 1993).

Some Florida counties have enacted local laws or ordinances to address some of the problems landowners have encountered with hunters. Okaloosa County, in northwest Florida, passed an ordinance that required animals be under the control and custody of the owner at all times (1994 Supplement to Fla. Statutes). This may deter some hunters from allowing their hunting dogs to enter private property without permission. However, this appears to be an exceptional ordinance, not common to the rural counties most affected.

The GFC exercises regulatory authority concerning wildlife management issues within Florida. The rules and regulations passed by the GFC are documented in Title 39, Florida Administrative Code. These laws are narrowly confined to those issues affecting wildlife (all inclusive). This is mandated by Article IV, Section 9, Florida Constitution. The Florida Constitution states that the: "commission shall exercise the regulatory and executive powers of the state with respect to wild animal life and fresh water aquatic life, . . ." (Fla. Wildl. Code 1995). Absent the historical knowledge as to why certain laws were passed by the GFC, one may conclude that the agency has been unresponsive to private property abuses. However, private property owners have been responsible, at least in part, for the GFC prohibiting road right-of-way hunting and modifying the methods used for taking game. (B. Goodson 1987).

In 1983, a virtual range war erupted in Holmes County pitting landowners against hunters. Landowners allege that groups of rogue hunters were systematically trespassing on their property. According to an article in the Jackson County Floridian, the actions of the hunters forced some farmers to leave their homes in fear. A hunter in northern Holmes County was arrested and charged with aggravated assault when he pointed a firearm at a group of property owners (Anon. 1983). This incident, combined with a history of complaints from private property owners, led to formal action by the GFC to ban the practice of hunting from road rights-of-way in Florida. According to an article in the Pensacola News-Journal, the action taken in Florida to curb roadside

hunting was indicative of the government's efforts to resolve this emotionally charged issue in other southern states as well. According to the article, an Alabama circuit judge had issued an injunction, which, among other things, prohibited a band of hunters from possessing firearms on land upon which they had no legal interest or on any public road within the county (Moore 1983).

Violence in Florida erupted again in 1987 when a Washington County resident was attacked by a group of hunters he confronted for recurring property abuses. According to an article in the Washington County News, the problems revolved around the practice of hunters using free-running dogs to pursue deer (Anon. 1987). The GFC responded to the public's demand for protection by strengthening the prohibition against right-of-way hunting. This action was intended to allow law enforcement officers more discretion in responding to public complaints.

An exception to the road-hunting prohibition allowed hunters who hunted on public hunt areas to continue hunting from the road rights-of-way. Hunters using free-running dogs to take deer in the Blackwater Wildlife Management Area exploited this opportunity by allegedly running dogs on property of residents living adjacent to the management area. An article in the Crestview News Leader quoted an attorney, representing a group of property owners whose property bordered the Blackwater area, as he spoke of the group's resolve to protect each person's property rights. "We have a constitutional right to own and enjoy property. It's not a constitutional right to own and run a hunting dog. It's a privilege. We don't oppose them owning dogs or hunting with them so long as it does not infringe on the rights of the property owner (Heinz 1995)." The GFC responded in May 1995 by prohibiting the use of free-running dogs for taking deer within the area where the conflicts were occurring.

Once again a neighboring state focused attention on a similar problem as the Alabama Conservation Advisory Board met in Gulf Shores, Alabama, on 17 June 1995. The *Islander*, a Gulf Shores newspaper, reported that property owners and dog-deer hunters faced off to debate regulations affecting deer hunting in several Alabama counties (Hyer 1995).

In its May 1995 edition, the *Texas Monthly* reported a vicious determination exhibited by a few individuals who insisted on "status quo" hunting. The hunters were resisting prohibitions against using free running dogs to take deer. The article characterized east Texas outlaw hunters who have resorted to arson as a means to resist the changes thus: "Those who have burned the woods of East Texas possess an almost exotic stupidity, along with a sociopathic ability to rationalize wild violence. They bear little resemblance to the true East Texas sportsman, but like bastard children, they cannot be easily written off. For these are reasons why they exist in this part of the world and have existed here for so long, quietly abhorred by the decent folk and law-abiding hunters who nevertheless turn the other way at the sight of a rogue flame. The reasons are older than the East Texas pines, rooted in a tradition that has outlasted any fire, any flood, any wind of change" (Draper 1995).

Data from a study conducted by the Virginia Department of Fisheries and Wildlife personnel suggests that the problems landowners in Florida have experienced with hunters are shared by landowners in other parts of our nation. Their study,

conducted in 1981, concluded that the most commonly reported forms of property abuses were hunting without landowner permission, releasing dogs on or near property without the owner's permission, and littering (Bromley and Hauser 1984).

The results of the study indicated that conflicts involving fishermen did not command the attention of the law enforcement community nearly as often as hunting, especially in the rural communities. When private property abuses involve fishermen, the emotions aren't nearly as elevated. Many appear to be the result of misunderstandings. Some property owners feel that waterfront property ownership conveys a special privilege entitling the owner control over public waters bordering their property. Some conflicts occur when fishermen continue fishing areas which have been developed. Development is typically followed by restricting access and gaining ingress and egress control over the property.

The GFC is restricted as to the regulatory action it may take. Although the behavior of a minority may be grossly irresponsible and may adversely affect resource users as a whole, ethical behavior cannot be legislated by the GFC. GFC administrative action must be justified by a clear link to a wildlife species. The only exception may be on public use areas where the GFC has a contractual obligation to perform certain functions. This may include closer, and at times, more restrictive management of the public through the regulatory process.

Florida has experienced unprecedented growth within the last 50 years. This growth trend has resulted in the vast majority of the state's wild animal life, as well as the habitat upon which they depend, occurring on private property. Support from private property owners is critical if we are to perpetuate our natural resources. A partnership must exist between government and private landowners. The GFC cannot ignore the demands of private property rights advocates, any more than it can ignore the poacher's bullet. Both could lead to catastrophic consequences for our natural resources.

To examine the issue of private property rights and the rights of the public to exercise control over wild animal life, it is essential to understand the diverse positions each culture has assumed. Narrowly and subjectively defined, wild animal life is viewed by many as a tangible asset, common to all citizens, and not the property of an individual landowner upon whose soil it happens to occur. However, the property owner may argue that by virtue of legal ownership he, not the government, is the custodian and perhaps owner, of the animals, domestic or otherwise, occurring on the property to which he holds the deed or title and upon which taxes are paid.

The 80% return rate on the questionnaire was surprising, especially in view of the premature assumption that the landowner/hunter/fishermen conflicts were isolated to the north Florida areas. In fact, many of the officers reported that the conflicts occurred frequently throughout Florida and involved both hunters and fishermen.

Fishing is primarily a spring, summer, and early fall activity. Conflicts are less likely to be violent and many involve a misunderstanding regarding property rights. Many waterfront property owners object when individuals fish near their docks and boathouses. This activity may be irritating but, in most instances, it is not unlawful on navigable waters or jurisdictional wetlands. Both are considered public domains.

Some of the most attractive areas for development in Florida have been lakes and streams situated near the suburbs of population centers. A common practice by developers to increase the quantity of waterfront property is the development of "dikes" and "canals." Fishermen frequently use these navigable water bodies for travel or fishing. Many landowners mistakenly believe that these bodies of water are for their exclusive use. Irresponsible operation of vessels or personal watercraft accounts for many allegations of private property abuses. Excessive speed or the wave action associated with improper vessel operation leads to the establishment of "no wake zones," which are, at least partially, intended to provide protection to private property.

Hunting is a fall and winter activity. Private property abuses attributed to hunters have a tendency to be more violent. One obvious reason may be that the participants are generally armed. Another less obvious reason has more to do with the almost arrogant demeanor exhibited by some of the hunters who appear to exude contempt for anyone who dares to challenge the transgressor's actions. Property owners complain that abusive hunters have remarked that, "Grandad hunted this land, Daddy hunted this land, and me and my sons will hunt this land."

Some landowners are reluctant to confront abusive hunters for fear of reprisals. Many of the affected property owners in rural areas are farmers, ranchers, or have land planted in timber. They express fear that irate hunters may resort to arson as a means to discourage reporting property abuses (Draper 1995). There are other reasons property owners are hesitant to bring criminal charges against abusive hunters. In some communities, the abused and the abusers are actually neighbors. During the hunting season, some communities are split into 2 camps—the property owners and the hunters. Another reason the property owners do not pursue criminal charges is the hesitancy to become involved in a criminal justice system that they don't understand (B. Goodson 1987).

Trespassing is a component of the property abuse problem. The GFC, like many law enforcement agencies, has been reluctant to make independent arrests for trespassing. That is to say that the property owner is required to indicate, through an affidavit, a willingness to prosecute the offender. Agencies have experienced incidents where trespassing charges have been dropped by a property owner who was convinced that the individual had "learned their lesson" or was contacted by a relative or mutual acquaintance who convinced them to drop the charges. When the trespass satisfies the criteria necessary for a felony charge, some landowners are unwilling to proceed. There are concerns that this landowner action may, unwittingly, increase agency liability.

The conflicts that occur as a result of private property abuse demand the involvement of many agencies within the criminal justice system. Responses from the officers indicate that some of the larger agencies (e.g., Dade County) respond to all calls or complaints from the public. Conversely, some of the smaller agencies (e.g., rural law enforcement officers) tend to refer all calls involving hunters or fishermen to the GFC. However, there is some degree of interaction among law enforcement agencies in most counties. The agreements between agencies as to who will respond to conflicts

involving hunters or fishermen are generally informal. The exceptions occur primarily in southern Florida where the agreements are perhaps more structured or formalized to provide a coordinated response. Large areas are established as "bird sanctuaries" in southern Florida. The bird sanctuary status prohibits the taking of any species of wildlife within a designated area. Private property abuse occurs more often when "dove" hunters trespass on private property to hunt or retrieve game. Another problem occurs when hunters shoot too close to homes and "shot" or "spent" shotgun pellets fall onto people or property.

Opinions as to why hunters and fishermen ignore or abuse the property rights of others are varied, to say the least. Many of the officers felt that 1 of the primary reasons for the abuse is that the historical freedom to use property is either modified or completely eliminated when property ownership changes. The growth trend in Florida has eternally altered land use, but many hunters and fishermen have not modified their behavior. One interesting observation concerns the thought that the typical hunter/fisherman was mentored by a close family member, who also was a hunter/fisherman. It is likely that the values held by the teacher were instilled just as soundly as the knowledge of the sport. If the father/teacher respected the rights of others, then so will the child/student.

One respondent wrote, "(Squeaking the fence) is an accepted method of land access for certain groups, often rationalized by misinterpretation of the legal premise that wildlife is held in common, not individual, ownership." Perhaps there is some vestige of the old revolutionary, pioneer spirit that is invoked when an average citizen refuses to conform to the demands of those they perceive as the rich or powerful landowner.

This philosophy may seem foreign to many, but consider this: an 18th century English jurist named Blackstone summarized the common law of England in his "Commentaries on the Law of England." The Old English laws reserved the game for "gentlemen" and insured that the poor could neither consume nor interfere with the animals that ravaged their crops. The game was reserved for the upper classes. The upper-class land barons were given the right to hunt. In his arguments against the land barons, Blackstone asserted that wild animals are owned by no one, and having no owner, belong to the King. This view suited America at the time of the revolution.

Game in America was scattered throughout rural areas and inaccessible wilderness. Any policy that restricted hunting to an elite group of landowners would have allowed a substantial resource to remain unused in the wilderness. The practical policy for America was that the owner of the soil had no special right to the wildlife. After the revolution, the powers of the King passed with the separation to the original 13 states, where they remain in the 50 states today. From the beginning of our nation, special "privileges" with fish or wildlife resources have been deemed inconsistent with the "common use" concept (P. A. Lenzini unpubl. rep. First Governor's Symp. of N.A. Hunting Heritage, Bozeman, Mt.).

Officers cite a failure within the judicial system to properly adjudicate as 1 reason individuals continue to abuse the rights of others. In some areas, these types of crimes

are viewed as "victimless crimes." Many officers felt that hunting or fishing privileges should be suspended if an individual is convicted of a crime involving hunting or fishing on private property without landowner permission.

The GFC officers were almost evenly divided as to whether the current laws are adequate. However, there appears to be void in the state laws concerning trespass hunting dogs. A property rights advocacy group formed in April 1995 in northwest Florida noted this inadequacy within the state laws. The organization, Northwest Florida Rural Property Owners Association, is considering a proposal to change the state laws that govern hunting dogs (Heinz 1995).

In 1983, the GFC responded to a violent confrontation in Holmes County between a group of deer-dog hunters and property owners by prohibiting the taking of wildlife from the road rights-of-way. In 1987, the GFC responded to a violent confrontation in Washington County between a group of deer-dog hunters and property owners by strengthening the prohibition against taking wildlife from the road rights-of-way. In 1995, the GFC responded before the confrontation became violent in Okaloosa County. Establishing dialogue with the individuals involved in the conflict during the early stages of the confrontations combined with the establishment of a "no dog hunting" area appear to have eased the tensions, at least for the present time. The long term solution to this problem is likely to be much more evasive.

The action taken by the GFC to establish a 11,340-ha "still hunt" area in the Blackwater Wildlife Management Area required a substantial commitment from the GFC's Division of Law Enforcement. Modification of the traditional hunting methods within this area; i.e., no dogs, was resisted by some hunters. To insure the success of the new law, special law enforcement operations, including covert investigations as well as saturation patrol details involving the use of marked patrol vehicles, K-9s and aircraft, were conducted.

A comparison of officer activity within the Blackwater area during the 1994-95 and 1995-96 seasons reflects an increase in the number of hours dedicated to this area, while the arrests or number of citations actually declined by 18%. There are at least 2 possible explanations for this. First of all, the officers were concentrated in the newly established-ha. still hunt area during the 1995-96 season. During the 1994-95 season, the officers were patrolling the entire Blackwater area (approximately 75,522 ha), which resulted in more public contacts. The second explanation concerns the deterrent value of high visibility saturation patrols within a relatively small area. No doubt many crimes were prevented by the mere presence of wildlife officers.

Public complaints increased from 35 during the 1994-95 season to 83 during the 1995-96 season. This represents a 137% increase in complaints. On the surface this might appear to indicate a significant increase in the incidence of crime within the study area. However, the violations most often reported by the public would not have been prohibited acts during the 1994-95 season. It is noteworthy to point out that the citizens in the study area formed an organization that encouraged members to report incidents of suspected abuse by hunters. This might account for a substantial number of the complaints.

The GFC met with individual hunters and landowners, as well as groups of

hunters and landowners, to seek solutions. This interaction will be critical if these diverse cultures are to coexist.

The interviews provided a citizen's perspective of this issue. The cultures, although diverse, are consistent in their view concerning the right of a property owner to approve the harvest of game or fish on their property. This is interesting considering that 90% of the hunters knew of instances where hunters or hunting dogs had entered private property without the owner's permission. One interviewee stated that dog hunters do not consider the practice of allowing free running dogs to enter private property an abuse of property rights if no tangible damage results. The hunters reasoned that the dogs will be on the property for only a short time if uninterrupted. One dog hunter acknowledged that, once released, the hunter has little control over the dog's travel. Considerations which influence the decision to terminate the hunt or allow the dogs to continue include the relative size of the deer or the deer's antlers, the legal status of the quarry, and the likelihood of harvesting the game or retrieving the dogs within a reasonable amount of time. The likelihood of apprehension, should the chase result in some unlawful act, appears to be a consideration within some of the less ethical hunting groups.

The landowners gave graphic accounts of abusive incidents ranging from assaults to property destruction. The most alarming factor to emerge during this research is the fear that some landowners have for reprisal or retribution against them or their property should they object to the abuses by a few of the dog hunting groups. Whether imagined or real, this perception is difficult to understand.

This is a social issue involving cultures, traditions and rights. The values are deeply ingrained within these diverse cultures and, at first glance, may be perceived as benign. Closer observation reveals a conflict that has become so emotionally charged that an effective resolution may be difficult to achieve. The action taken by the GFC is intended to de-escalate a potentially violent conflict that threatens a time-honored tradition in Florida. Fishing and hunting have occurred in Florida for many, many years.

More restrictive action may be required if conflicts continue. The GFC cannot allow the irresponsible actions of a few to bring about the total cessation of lawful hunting or fishing in Florida. In the final analysis, property rights will prevail over the privileges enjoyed by hunting and fishing enthusiasts.

Literature Cited

- Anonymous. 1983. Hunters, farmers in "range war." Jackson County Floridian. Un-numbered report.
- Anonymous. 1987. Hunting controversy. Washington County News, Florida. p.1.
- Bromley, P. T. and T. G. Hauser, Jr. 1984. Hunter access to private lands in Piedmont, Virginia. Proc. Annu. Conf. Southeast. Assoc. Fish and Wildl. Agencies 38:266-271.
- Burnett, G. M. 1986. Florida's Past Vol. 2, People and events that shaped the state. Pineapple Press, Anglewood, Fla. pp. 184.
- Draper, R. 1995. Burning down the woods. Texas Monthly. May:131-136; 183-188.

- Florida Wildlife Code, Title 39, Article IV, Section 9, Game and Fresh Water Fish Commission. 1995.
- Foster, D. 1995. Private rights vs. the common good. Sun. Gainesville, Fla. pp1g, 4g.
- Goodson, B. 1987. Road hunting enforcement report. Fla. Game and Fresh Water Fish Comm., Tallahassee, Fla. pp1-3.
- Heinz, C. 1995. Property owners group forms. News Leader. Crestview, Fla. p.5a.
- Hyer, B. 1995. Outdoor enthusiasts voice opinions during conservation meeting. The Islander, Gulf Shores, Ala. p. 1a.
- Moore, C. 1983. Hunters rally against Alabama county's 'unfair' injunction. The News-Journal. Pensacola, Fla. p.10b.
- 1994 Supplement to Florida Statutes 1993, Chapter 810, Burglary and Trespass. Ordinance No. 92-25, An Okaloosa County, Florida, Animal Ordinance. pp 2117-2118.