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*WRNC is a 501(c)3  
nonprofit corporation  
whose mission is to share  
information and  
knowledge about wildlife  
rehabilitation for the  
benefit of native wildlife.*

July 3, 2009

Mr. Gordon Myers, Executive Director  
North Carolina Wildlife Resources Commission  
1701 Mail Service Center  
Raleigh, NC 27699

RE: Proposal to implement special RVS Rehabilitation Permit

Dear Mr. Myers,

Every year animal control organizations, police departments, veterinarians, wildlife rehabilitators and North Carolina Wildlife Resources Commission (NCWRC) officials face the dilemma of dealing with orphaned and injured rabies vector species (RVS) across our state. All of these agencies receive calls from concerned citizens regarding raccoons, skunks, fox and bats they have found, especially neonates. Currently, there is no channel to deal with these species that is viewed morally acceptable by many NC citizens or which minimizes public health risks. We feel that it is time to establish a more acceptable way to deal with the rabies vector species in our state.

Wildlife Rehabilitators of North Carolina, Inc. (WRNC) proposes that the NCWRC establish a permit allowing specially trained wildlife rehabilitators to accept and provide appropriate care for RVS. Our organization is prepared to coordinate and provide the essential training required for rehabilitators who wish to apply for the permit and has set aside the necessary funding to finance this training. We propose that prior to applying for the RVS permit the rehabilitators would be required to meet the following criteria:

1. Receive complete rabies pre-exposure vaccinations, have antibody titers checked every two years and maintain immunization with vaccine boosters as appropriate
2. Complete the RVS specific training class
3. Have RVS appropriate caging in place
4. Have at least one full year of wildlife rehabilitation experience prior to submitting application
5. Have no record of wildlife violations

We wish to provide a way for the public to surrender RVS animals with the confidence that the animals will receive appropriate care. Without such an alternative, untrained private citizens often try to raise these animals, risking themselves and others to exposure to parasites and zoonotic diseases that may be

life threatening. With the alternative of having access to properly trained, vaccinated, permitted rehabilitators the public can legally turn these animals over to, the best situation for public health and the animals can be achieved.

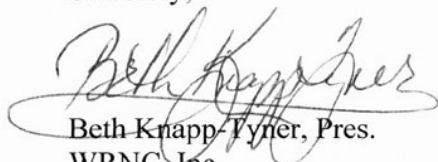
Every other state on the east coast, abiding by wildlife rehabilitation regulations, has an established RVS program such as the one we are proposing. To ensure safety for our state's residents and tourism, we feel it is time for North Carolina to follow suit. Establishing an RVS program is sound public health planning and makes sense for the many people who face dealing with RVS issues and problems every year. The need for such an RVS program has been well documented in a study done by Drs. Schopler and Hall (Schopler RL, Hall AJ, Cowen P. Survey of wildlife rehabilitators regarding rabies vector species. J Am Vet Med Assoc. 2005 Nov 15;227(10):1568-72).

WRNC would like to work with NCWRC to make the RVS permit available as soon as possible. We can schedule the special RVS training class for state certified wildlife rehabilitators as early as our next annual symposium, which will take place at the end of January 2010. Application for this special permit could then be offered in early spring of 2010. Our board of directors is in full support of this program and we have an RVS Committee already established that is ready to begin working with NCWRC Permits and Planning supervisor, Daron Barnes, to implement the proposed RVS permit application process.

We are asking that you adopt our proposal to grant a permit for RVS rehabilitation with the appropriate pre-requisites for application of same.

We look forward to hearing from you soon and continuing our work with the NCWRC; providing the best management and care of our natural resources and professional service to North Carolina citizens. If you have any questions, please do not hesitate to contact either our RVS Committee chair, Jean Chamberlain, at 336-983-6543; [jchamberlain1@windstream.net](mailto:jchamberlain1@windstream.net), or myself at 828-863-0505; [WildatHeartRehab@aol.com](mailto:WildatHeartRehab@aol.com).

Sincerely,



Beth Knapp-Tyler, Pres.  
WRNC, Inc.

ENCLOSURE

cc: RVS Committee file  
Daron Barnes, NCWRC Planning and Permitting supervisor