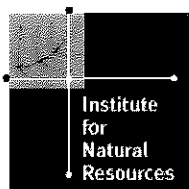


**Public Testimony
Received at Meeting
March 18, 2016**



Oregon Biodiversity Information Center

Institute for Natural Resources – Portland
School of the Environment, College of Liberal Arts and Sciences

Mail Stop: INR
Post Office Box 751
Portland, OR 97207-0751

503-725-9950 tel
503-725-9960 fax
www.inr.pdx.edu

March 17, 2016

Oregon Biodiversity Information Center State Ranking System

Oregon Biodiversity Information Center (ORBIC) has become aware that ODFW is proposing to use our ranking system to identify species that are widespread and abundant (S5) for use in revised rules on holding native wildlife species. We believe this is an appropriate use of our state ranks, and support ODFW's use of this information. We welcome the opportunity to explain our ranking system to the commission.

The Institute for Natural Resources (INR) was established by the Oregon legislature to help integrate environmental data from an array of state and federal agencies, watershed councils, counties, universities, and soil and water conservation districts that collect natural resource information. INR uses this information to provide scientifically-based information to the public in order to improve natural resource decision making. Biodiversity information management at INR is coordinated by the Oregon Biodiversity Information Center (ORBIC). ORBIC's key function is to maintain, develop and distribute information on Oregon's plants and animals. The center works with partners, both statewide and nationally, to provide the most comprehensive information on plants, wildlife, invertebrates, fish, fungi, and habitats throughout Oregon. ORBIC is part of a national network including programs in all states supported by NatureServe, a non-governmental organization.

An important part of ORBIC's mission is to identify which species are thriving, and which are in need of conservation action. ORBIC uses a rigorous, transparent, and consistent methodology, originally developed initially by The Nature Conservancy and now maintained by NatureServe, to assign global and state conservation status ranks to all terrestrial vertebrates in Oregon based on the best available information. This system has been in use in Oregon and across the country for over 30 years. On a global basis, these ranks provide an objective estimation of extinction risk, while state ranks identify relative security of species statewide. Because the NatureServe ranking system is standardized, state ranks can be compared across state boundaries and can inform global ranks. In recent years, NatureServe has worked with IUCN to standardize rankings across both organizations, allowing for ranking information to be used by both IUCN and NatureServe. The purpose of the conservation status ranks is to assess the relative risk facing a species, and does not imply that any specific action or legal status is needed to assure its survival.

Other state and federal agencies, including US Forest Service, Bureau of Land Management, US Fish and Wildlife Service, Oregon Department of Forestry, and Oregon

- Area of occupancy – area of habitat occupied by the species; a subset of the range extent
- Number of occurrences (or local populations) – the number of local populations is only relevant when ranking rare species. Occurrences are typically not recorded for common species (though we do maintain point observations for common species).
- Number of occurrences with good estimated viability – only applicable for rare species; addresses likelihood of species to persist in the near future.
- Population size – Estimated current total mature population of the species within the state. Large populations are more secure than small ones.
- Environmental specificity – a species with very narrow habitat requirements will likely be more rare than a similarly distributed species that is a habitat generalist.
- Trends
 - Long term trends – over past 100 years
 - Short term trends – over 10 years or three generations
- Threats – specific threats are assessed based on the following factors and one combined threat level is assigned for the species. Assigned threat levels range from low to very high.
 - Threat scope – proportion of the species that can be expected to be affected by the threat
 - Threat severity – level of damage that can be expected with continuation of current threats; percent reduction in population affected by threat
 - Intrinsic vulnerability – only used when information on threats is not available. Reflects the degree to which the species is vulnerable or resilient to natural or anthropogenic stresses.
 - Threats assessed include:
 - Residential and commercial development
 - Agriculture and aquaculture
 - Energy production and mining
 - Transportation and service corridors
 - Biological resource use
 - Human intrusions and disturbance
 - Natural system modifications
 - Invasive species
 - Pollution
 - Geologic events
 - Climate change

NatureServe has developed a ranking calculator spreadsheet to make the process of assigning ranks unbiased, repeatable and transparent. The calculator assigns ranks based on weightings assigned to each of the above rarity, threats and trend factors. The calculator ensures that the same ranking methodology is used in the calculation of all ranks. It also increases the likelihood that different biologists ranking a given species with the calculator will arrive at the same rank. In cases where there is disagreement over ranks, the rank

Roxann B Borisch

From: Michael <molfamily@earthlink.net>
Sent: Friday, March 18, 2016 7:47 AM
To: odfw.commission@state.or.us
Subject: Wildlife Holding and Propagating Rule Changes

TO: Holly Akenson, Michael Finley, Bruce Buckmaster, Gregory J. Wolley, Bob Webber, Jason Atkinson, Laura Anderson

Today the ODFW staff is going to be briefing you on the Wildlife Holding and Propagating Rule Changes and I unfortunately cannot be there as I had heart surgery yesterday. I would like you to consider asking them these questions:

1. **Why were no herpetologists put on the advisory committee and does staff have objections to adding them now?** Audubon was there to represent birds but no expert was on the committee for reptiles and amphibians. Seems like a huge oversight. And based on this lack of representation, assertions have been made that are totally wrong for these animals.
2. **Why are home school families being discriminated against?** Teachers no longer have to pay for a permit, however home school families do. This is not fair.
3. Some of the impetus for the rule changes is because of the fear that children will spread diseases to amphibians and reptiles. **Can the staff provide any study that documents that tadpoles or other herps have ever caught MRSA or any of the other disease, from school kids and transferred that disease to native populations?** The answer is no. In fact, scientists are studying amphibian peptides to see why they are so antimicrobial and to see if there is an application for humans. If your staff had a herpetologist on the advisory committee they would know that amphibians are not zoonotic.
4. **How many frog larvae will be hurt or die as a result of people being asked to cut only two eggs out of a frog egg mass?** The herpetologists, biologists and veterinarians I have spoken to give a range from a half dozen to two dozen could be impacted. And I am not sure your staff spends any time in the classroom, but teachers want frog eggs so the children can see the transition into frogs.

These rule changes will drive our children farther away from nature and quite frankly have not been demonstrated as being necessary for herpetofauna. In Richard Louv's book *Last Child in the Woods*, he writes about the disconnection of our children from the woods and how government over-regulation is part of the problem.

The department's budget is dwindling and I urge you not to spend it on more bureaucracy. Rather it should be spent on buying habitat and restoration. Not on misguided and unsubstantiated rules.

Thank you for your time.

Michael

ODFW Proposed Changes to OAR Division 44, Chapter 635

Presented by: Jeff Hoffman

March 18, 2016

Thank you for allowing me to comment on the proposed rule changes to OAR Division 44, Chapter 635. My primary concern is regarding the affects these changes would have on the private sector's rights to propagate reptiles and amphibians in captivity, as well as their rights to interact with them in the wild. However, much of what concerns me regarding the proposed rule changes applies to other wildlife and exotic animals that would also be affected.

The proposed inclusion of Federally listed non-native threatened or endangered species is an ineffective one and overreaching in its breadth. In 2014 Arizona proposed regulations nearly identical to those currently under consideration by the Oregon Department of Fish and Wildlife (ODFW), and dropped the proposal after hearing from experts and stakeholders regarding the negative impact such regulations would have. Also in 2014, Virginia repealed their non-native ESA-listed species regulations with SB 50, making listed species legal to keep, breed, buy, and sell. While regulating ESA species at the state level may sound beneficial to conservation efforts, it simply is not. Legislators from both Arizona and Virginia came to this conclusion after making a point to become more thoroughly educated on the matter.

A national study from the American Pet Products Association (APPA) estimates that over 60,000 Oregon residents responsibly keep reptiles and amphibians as pets. As per a Georgetown Economic Services study, the reptile and amphibian segment of the pet industry in Oregon yields an annual revenue of over \$17,000,000.00.

I own and operate the Pacific Northwest Reptile and Exotic Animal Show (PACNWRS). PACNWRS is an annual trade show currently held at the Washington County Fairgrounds in Hillsboro, OR. This year there are over 70 businesses and private citizens planning to vend at my show, and an estimated 5,000 members of the public are expected to attend the two-day event. The implementation of these

proposed regulations would require PACNWRS to withdraw from operating in Oregon, and would still have a reaching negative affect for its operation in WA, as the businesses and hobbyists based in Oregon who comprise many of PACNWRS' vendors would likely be forced out of business. In addition to private hobbyists in Oregon, again numbering over 60,000 and who generate 17,000,000.00 in Oregon pet industry revenue, pet stores and non AZA accredited educational facilities would be negatively impacted, likely to the point of bankruptcy.

Individuals who break the law will continue to do so. Meanwhile the aforementioned private hobbyists who provide so much to the state of Oregon by way of their educating the public and generating the significant revenue for their state that they do, would have turned over their animals for sterilization or euthanization. Disregarding the lost pet trade revenue to Oregon, the impact on ESA-listed wildlife upon the implementation of the proposed regulations could create a potentially catastrophic ripple effect. Loss of the potential offspring generated by the breeding stock currently owned by the 60,000 members of Oregon's private reptile and amphibian hobbyists would create a shortage of specimens desired throughout the rest of the nation, as well as other countries. This would open opportunities for increased smuggling of ESA-listed and protected species to satisfy the increased demand. Again, state level regulation of ESA species simply does not yield the desired results.

The supposed intent of the proposed rule changes is to protect native species from collection. ODFW has presented no evidence suggesting this is a problem. Oregon law already prohibits the sale of native wildlife, including reptiles and amphibians. It is my firm belief that implementation of the new regulations would not only fail to protect native wildlife, but would have a drastic negative impact on Oregon's pet industry, all while failing to protect ESA listed species. Enforcement of existing laws would more effectively address any concerns than anything the proposed regulations aim to achieve.

Dear Commissioners:

I am Andrew Fields representing the Oregon Christian Home Education Association Network (OCEANetwork).

OCEANetwork is the primary advocacy group for homeschoolers at the Oregon Legislature. We have more than 50 affiliated support groups and points of contact in Oregon and represent the interests of our constituents statewide.

On page 3 of the Agenda Item Summary you have before you, the Issue Analysis section has three points we ask you to consider for us:

- Impacts to citizen science projects
- Scientific Take Permit activities
- Ability for school teachers to legally and efficiently continue to provide meaningful learning experiences for students

OCEANetwork is concerned that homeschoolers might be discriminated against when these OARs are adopted. Homeschooled students are taught by parents, co-op teachers, private teachers of classes, and of course the homeschool students themselves through independent study.

So OCEANetwork respectfully asks that you make sure homeschoolers have the same standing regarding permits and conditions that you give to institutional K-12 schools before you approve these OARs.

We will be happy to work with staff to make sure they understand our needs. Please contact Rodger Williams at williams@oceanetwork.org

Thank you.

Andrew Fields



17 March 2016

Oregon Fish and Wildlife Committee

Re: Opposition to Proposed Revisions to Section 44

Dear Members of the Committee,

My name is Roland Sonnenburg, and I own a company that trains animals for film and television. I urge you not to adopt the current proposed revisions to Section 44.

The film industry brings over 150 million dollars per year into Oregon and employs thousands. As you likely know, just last week Governor Brown signed SB1507 into law, increasing the hugely successful incentive program to bring more films to Oregon, and encouraged the production industry to play an even larger role in the state's growth in the coming years. Most projects that come to our state do so in part because they want to take advantage of our beautiful scenery, and that means they need animal actors representing native species.

Twilight, Wild, Grimm, Portlandia, The Librarians, Leverage, Into the Wild. Every one of these and many other projects had animals, and many of them would not have happened in Oregon if these new regulations had been in place. I would be hard pressed to count all the projects Oregon already loses because of the restrictive cervid and coyote holding regulations. But I can tell you that Oregon will lose far more projects if these revisions are adopted.

If I had unlimited time, I would explain to you why the spirit of these revisions is woefully misguided—why the keeping of these animals is good for the individual animals who have better lives than they would in the wild, and for their species, why ODFW should not be micromanaging captive animals, how these revisions would fundamentally alter the philosophy of our state towards animal ownership in ways that are harmful to people and animals. I would reiterate that many of those who own these animals are already USDA licensed and inspected and do not need another redundant layer of oversight. I would explain to you that most of the animals that will be impacted by these revisions, now and long into the future, are not wildlife. They are cherished, beloved pets, born and raised in our homes, sharing long, happy, healthy lives with humans who cater to their every need and whim.

I would explain the many specific flaws in the proposed revisions: placing the burden of proof on owners, limiting numbers of animals for little rational reason, extremely restrictive transport rules, exempting some facilities based on their accreditation by a private organization, virtually unlimited inspections and inspection fees, the likely killing of animals over the number limits. I would point out how few problems there have been in the past decade and that these revisions seek to solve a problem that does not exist. But I trust my colleagues will cover most of those topics.

Instead of addressing each of these issues, I would like to advocate the only genuinely fair and productive solution available at this point: a new advisory committee comprised of a genuine, balanced cross-section of stakeholders.

You cannot assemble a committee of representatives of all the key organizations seeking to reduce or eliminate animal ownership, but invite virtually none of the actual stakeholders to participate, and then imagine that the committee was in any way fair or representative. Whether intentional or accidental, that is what happened here, and it led to a proposed set of regulations that would decimate several industries and an entire way of life. I do not know who the representative was of the exotic pet industry, but I do know that it was none of the key members of our community. Where were skunk owners, the wolfdog owners, the cat and raccoon lovers? The private zoos, the falconers, the film industry, the breeders, the sanctuaries?

While there is a great deal of complicated social and political pressure surrounding this issue, and lots of passion and some misguided zeal, I have worked with many people at ODFW over the years, and I truly believe that most of you are rational scientists who genuinely want to find effective and balanced solutions. These revisions are not that.

If you want a set of regulations that protect animals and people, that meet all the objectives of Section 44, you need an advisory group that understands and reflects the range of perspectives. You need a genuine discussion of the issues and viable solutions.

I propose this: set aside these revisions, and my colleagues and I will assemble a list of names—rational, thoughtful, experienced, competent people who are willing and capable—and you pick four names from that list and four names from the prior committee, and those eight people hash out a set of revisions that will actually work.

Thank you for your consideration,

Warmest regards,



Roland Sonnenburg

Members of the Commission:

My name is Jesse Short, and I am in opposition to the listing of certain additional reptile and amphibian species as "Non-game Wildlife Protected," the requiring of permits and their associated fees, and the ownership of "Non-game Wildlife Non-protected" by the state of Oregon as currently defined in section 0132 of the Division 44 rules (OAR [635-044-0132](#) amended in October of 2015).

There are five reptile and five amphibian species that the department is considering adding to the list of "Non-game Wildlife Protected" as defined in section 0005 of Division 44 (OAR [635-044-0005](#) previously 0130). However, only four of the species being considered have been evaluated in the most recent public version of the Oregon Biodiversity Information Center's list of "Rare, Threatened, and Endangered Species of Oregon." Of those four, only one, (the Mazama Newt, *Taricha granulosa mazamae*) is listed as "Critically imperiled because of extreme rarity or because it is somehow especially vulnerable to extinction or extirpation." The other three share the same or lower ranking as the Northern Sagebrush Lizard in rarity, and are listed as "vulnerable," "species of concern," and "not rare and apparently secure, but with cause for long-term concern." The Northern Sagebrush Lizard is considered a "Non-game Wildlife Non-protected" species under section 0030 (OAR [635-044-0030](#) previously 0132). If the department is going to use the ORBIC as a credible source for their population data and list all species that are "rare, threatened, or endangered," as stated in subsection a of section 0005, then the status of species being proposed for listing under Division 44 and those already listed should be reviewed. There are many that are not considered "rare, threatened, or endangered" by the ORBIC, yet are still listed as "Non-game Wildlife Protected." The species listed under section 0030 are claimed to be listed due to their evaluated status by ORBIC as well. However, many species on the list have not been evaluated for addition to the ORBIC's list.

The proposed permit requirements, and their associated fees, I find to be overly restrictive and a major inconvenience to many people. Section 0025 (OAR [635-044-0025](#)) gives the proposed rules regarding "Non-game Animals" that are grandfathered in. It states that the holder of wildlife that has been grandfathered in must submit "an application for an annual Holding Permit (wildlife or wolf), pay the associated fees, and secure a Holding Permit within one year of the adoption of these amended rules." It also states under subsection d that "Grandfathered animals may not be bred." and "Two or more held grandfathered animals of the same species of different sexes requires sterilization of either sex to prevent propagation prior to sexual maturity and within (30) days of permit issuance with documented certification by a licensed veterinarian." This is not an ethical option in native reptiles or amphibians. I personally keep Long-toed Salamanders, *Ambystoma macrodactylum* ssp., including small juveniles. These salamanders will not survive being spayed or neutered, even if you could find a licensed vet willing to perform the procedure. Many reptile and amphibian species are simply too fragile to survive a surgery of that nature. On top of that, section 0030 states that whenever more than two individuals of a "Non-game Wildlife" species are collected, they will require a "Wildlife Holding Permit," [section 0015 (OAR [635-044-0015](#) previously 0005)] which costs \$25.00 according to section 0035 (OAR [635-044-0035](#) previously 0030) and is valid through the 31st of December of that year. An

additional application and fee is required for every additional species that the holder has more than two of. The facilities may require inspection before approval of the permit as well, according to section 0040 (OAR 635-044-0040 previously 0035) subsection 4, which will cost the holder an additional \$150.00 per inspection according to section 0045 (OAR 635-044-0045 previously 0040) subsection 2. This will get incredibly expensive if the individual acquires multiple species. In addition to all of this, "Wildlife native to Oregon and acquired legally from an out-of-state propagator requires a Wildlife Holding Permit." according to section 0050 (OAR 635-044-0050 previously 0025), subsection 2.

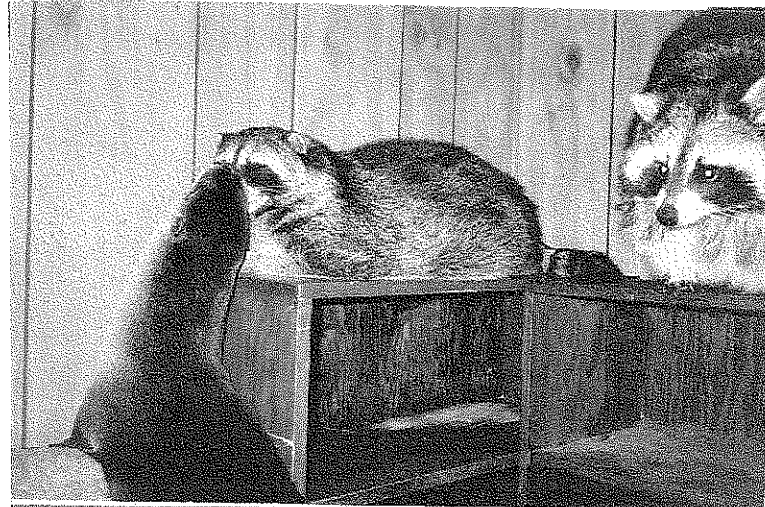
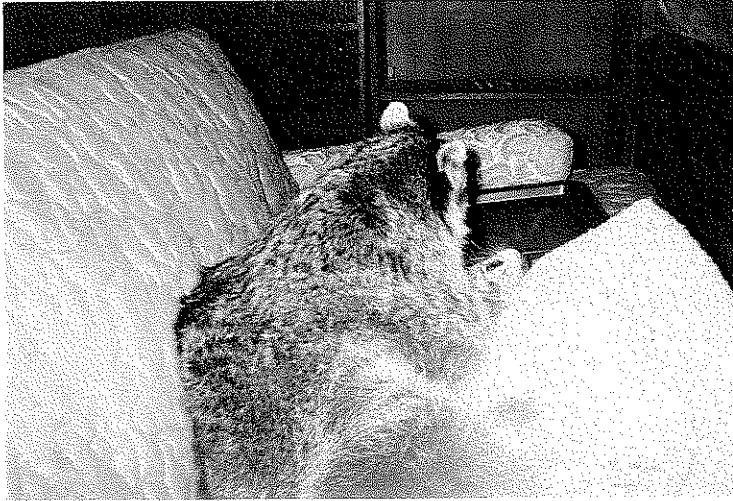
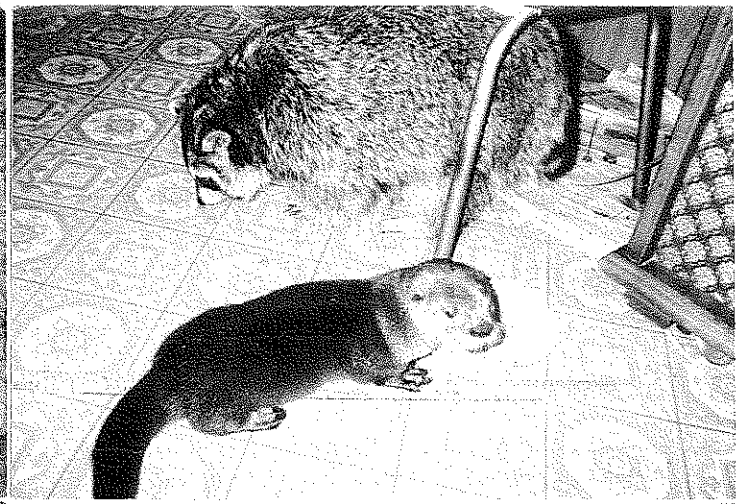
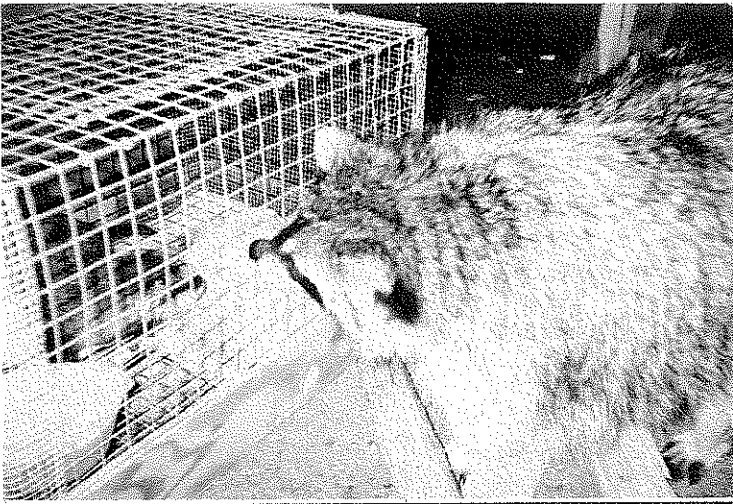
In section 0050 subsection 1, it states that "Native Wildlife, or the progeny thereof, captured from the wild in Oregon remains the property of the state of Oregon." This means that if the department so chooses, any and all animals can be confiscated at any time and for any reason. There is very little incentive to keep people honest if there is always a threat of losing your animals. Paying up to \$175.00 per species, per year, to keep them is not going to go well for most people, especially if the animals continue to be the property of the state while they are caring for them. It would be far easier for an individual to collect specimens and not inform the department than go through the permitting process and pay the fees. In my opinion, the rules are already effective enough. ORS 498.022 states: "Except as the State Fish and Wildlife Commission by rule may provide otherwise, no person shall purchase, sell or exchange, or offer to purchase, sell or exchange any wildlife, or any part thereof." With statutes like this, the state ensures that profit is not the primary drive behind native species in captivity. It does not prohibit the donation of animals to educational facilities, zoos, or individuals from which the previous owner receives no compensation. Allowing captive populations of native species in the general public can also help prevent future collection of wild specimens. If there is no demand for wild caught animals, then the number of animals collected will decrease. Preventing the keeping and breeding of species by keepers like myself, who are passionate about our native biodiversity and its conservation, is not the answer.

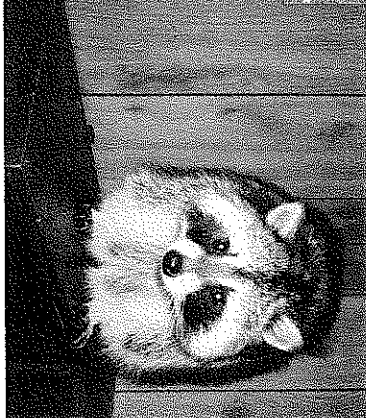
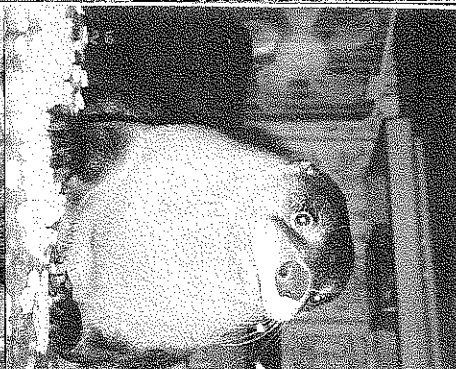
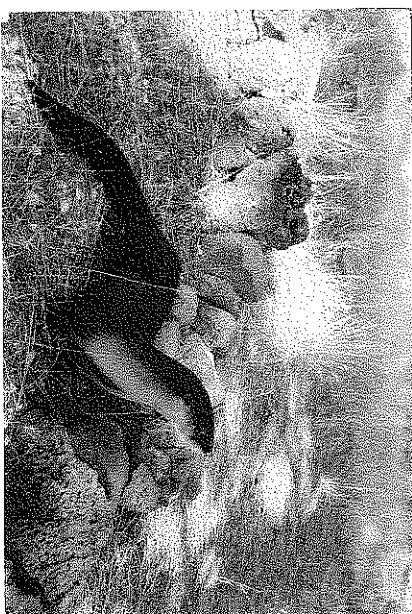
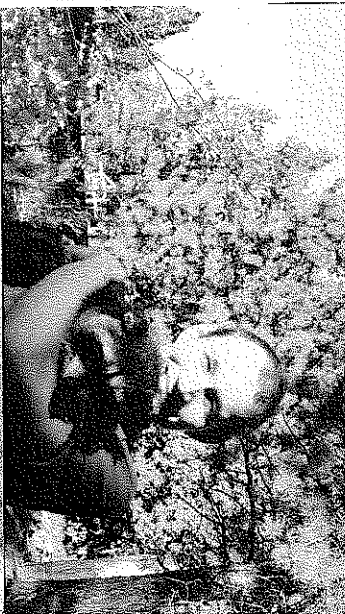
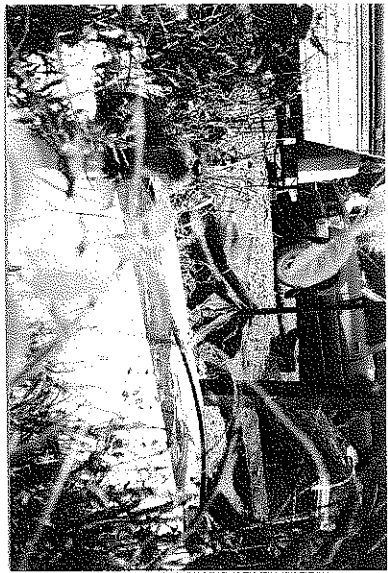
Thank you for giving me this opportunity to provide my input on this subject, I hope that you will take it into consideration.

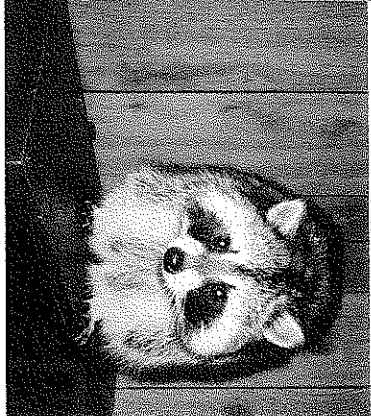
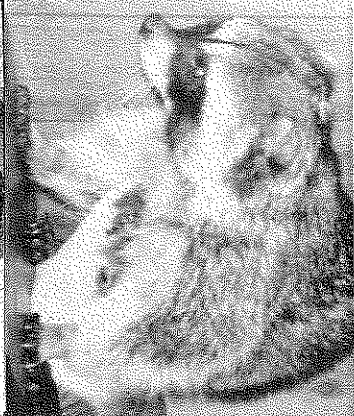
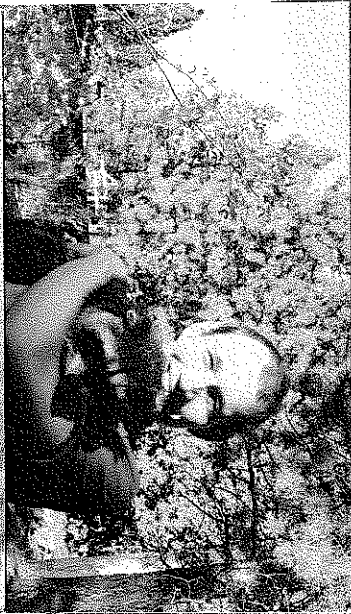
Scientific Name Common Name	Ecoregion; Adjacent States Oregon Counties	Heritage Rank	Federal Status	ODFW Status	ORBIC List
<i>Richardsonius egregius</i> Lahontan redbreast	BR; CA, NV Malh	G5 S2	--	--	2
<i>Salvelinus confluentus</i> Bull trout (Deschutes SMU)	BM, CB, EC, WC Croo, Desc, Jeff, Klam, Sher, Wasc	G4T2T3 S2S3	LT	SV	1
<i>Salvelinus confluentus</i> Bull trout (Grande Ronde SMU)	BM Unio, Wall	G4T2 S2	LT	SC	1
<i>Salvelinus confluentus</i> Bull trout (Hells Canyon SMU)	BM Bake, Unio, Wall	G4T2 S2	LT	SC	1
<i>Salvelinus confluentus</i> Bull trout (Hood River SMU)	EC, WC Hood	G4T2Q S2	LT	SC	1
<i>Salvelinus confluentus</i> Bull trout (Imnaha SMU)	BM Bake, Wall	G4T2Q S2	LT	SC	1
<i>Salvelinus confluentus</i> Bull trout (John Day SMU)	BM Gran, Umat, Whee	G4T2Q S2	LT	SC	1
<i>Salvelinus confluentus</i> Bull trout (Klamath River population)	EC, WC Klam, Lake	G4T2Q S2	LT	SC	1
<i>Salvelinus confluentus</i> Bull trout (Malheur River SMU)	BM, BR Bake, Gran, Harn, Malh	G4T2Q S2	LT	SC	1
<i>Salvelinus confluentus</i> Bull trout (Odell Lake SMU)	EC, WC Desc, Klam	G4T2Q S2	LT	SC	1
<i>Salvelinus confluentus</i> Bull trout (Umatilla SMU)	BM, CB Umat, Unio	G4T2Q S2	LT	SC	1
<i>Salvelinus confluentus</i> Bull trout (Willamette SMU)	WC, WV Clac, Desc, Lane, Linn, Mari	G4T2Q S2	LT	SC	1
<i>Thaleichthys pacificus</i> Eulachon	CR, KM, ME, WV; CA, WA, AK, BC Clat, Colu, Coos, Curr, Doug, Lane, Linc, Mult, Till	G5 S3?	LT	--	2
AMPHIBIANS					
<i>Ambystoma mavortium melanostictum</i> Blotched tiger salamander	BM, BR, EC; ID, WA + Desc, Harn, Klam, Malh, Wasc	G5T4 S2?	--	--	3
<i>Anaxyrus boreas</i> Western toad	BM, BR, CB, CR, EC, KM, WC, WV; CA, ID, NV, WA + Bake, Clac, Clat?, Colu?, Coos?, Croo, Curr, Desc, Doug?, Gill, Gran, Harn, Hood, Jack, Jeff?, Jose, Klam, Lake?, Lane, Linc?, Linn, Malh, Morr, Mult, Sher, Till, Umat, Unio?, Wall, Wasc, Wash?, Whee, Yamh?	G4 S4	--	SV	4
<i>Anaxyrus woodhousii</i> Woodhouse's toad	BR, CB; ID, NV, WA + Malh, Morr, Umat	G5 S2	--	--	2
<i>Aneides ferreus</i> Clouded salamander	CR, KM, WC, WV; CA Bent, Clac, Clat, Colu, Coos, Curr, Desc, Doug, Hood, Jack, Jeff, Jose, Klam, Lane, Linc, Linn, Mari, Mult, Polk, Till, Wasc, Wash, Yamh	G3G4 S3S4	--	SV	4
<i>Aneides flavipunctatus</i> Black salamander	KM; CA Jack, Jose	G4 S2	--	SV	2
<i>Ascaphus montanus</i> Rocky Mountain tailed frog	BM; ID, MT, WA, BC Bake, Unio, Wall	G4 S2	SOC	SV	2
<i>Ascaphus truei</i> Coastal tailed frog	CR, EC, KM, WC; CA, WA, BC Bent, Clac, Clat, Colu, Coos, Curr, Desc, Doug, Hood, Jack, Jeff, Jose, Klam, Lane, Linc, Linn, Mari, Mult, Polk, Till, Wall, Wasc, Wash, Whee, Yamh	G4 S3	SOC	SV	4

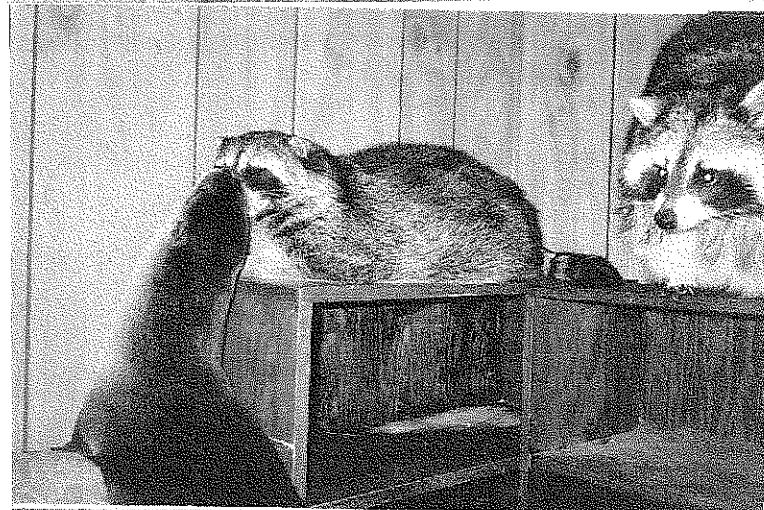
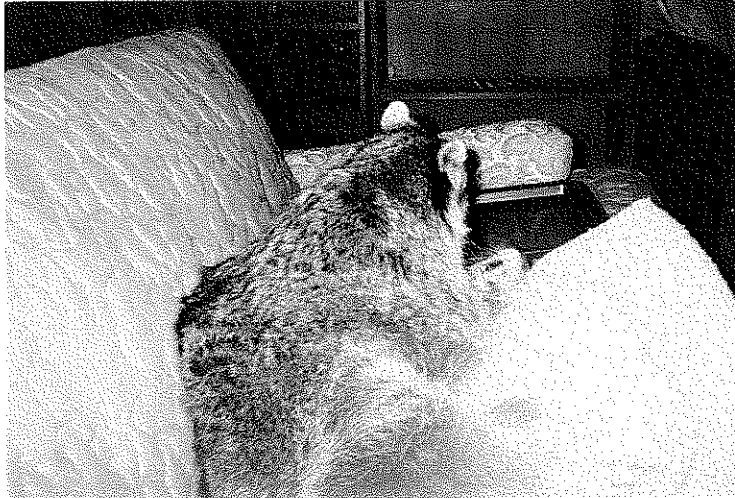
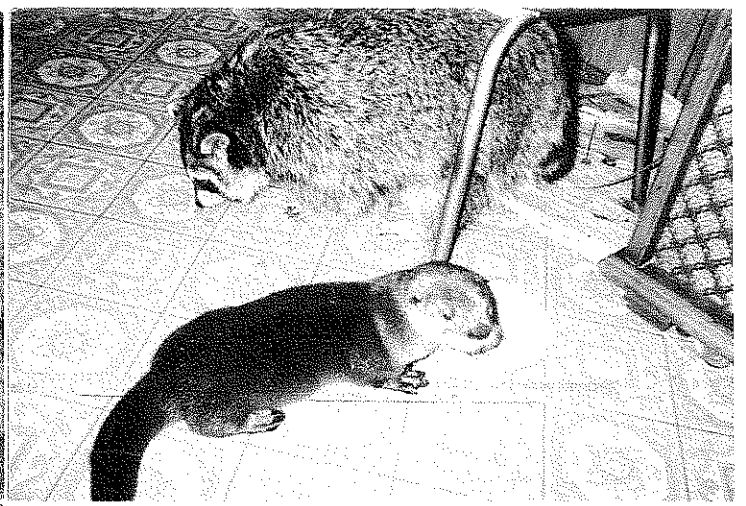
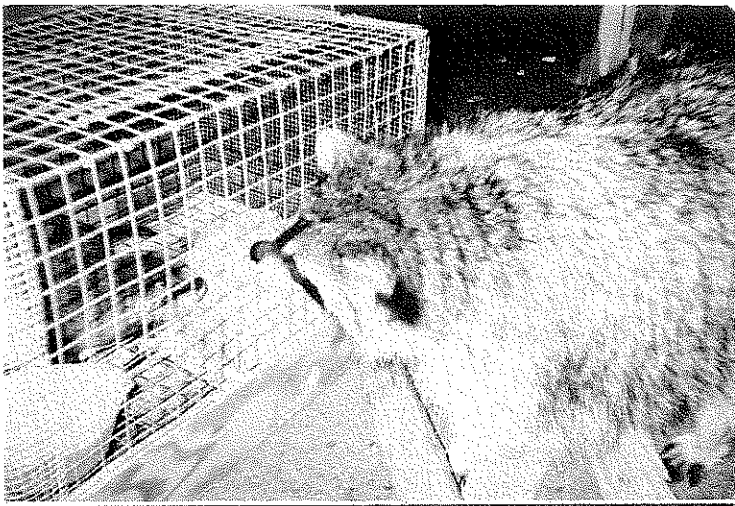
Scientific Name Common Name	Ecoregion; Adjacent States Oregon Counties	Heritage Rank	Federal Status	ODFW Status	ORBIC List
<i>Batrachoseps attenuatus</i> California slender salamander	CR, KM; CA Coos, Curr	G5 S3	--	--	4
<i>Batrachoseps wrighti</i> Oregon slender salamander	EC, WC, WV Clac, Desc?, Doug, Hood, Jeff?, Klam?, Lane, Linn, Mari, Mult, Wasc	G3 S3	SOC	SV	4
<i>Dicamptodon copei</i> Cope's giant salamander	CR, WC; WA Clac, Clat, Colu, Hood, Mult, Till, Wasc, Wash	G3G4 S2	--	SV	2
<i>Lithobates pipiens</i> Northern leopard frog	BM, BR, CB, EC, KM; CA, ID, NV, WA + Bake, Croo, Gill, Gran, Hood, Jack, Jeff, Klam, Malh, Morr, Sher, Umat, Wasc	G5 S1S2	--	SC	2
<i>Plethodon elongatus</i> Del Norte salamander	CR, KM; CA Coos, Curr, Doug, Jack, Jose	G4 S4	SOC	SV	4
<i>Plethodon larselli</i> Larch Mountain salamander	WC; WA Clac, Hood, Mult	G3 S2	SOC	SV	2
<i>Plethodon stormi</i> Siskiyou Mountains salamander	KM; CA Jack, Jose	G2G3 S2	SOC	SV	1
<i>Rana aurora</i> Northern red-legged frog (SV in WV and KM ecoregions only)	CR, KM, WC, WV; CA, WA + Bent, Clac, Clat, Colu, Coos, Curr, Doug, Hood, Jack, Jose, Klam, Lane, Linc, Linn, Mari, Mult, Polk, Till, Wasc, Wash, Yamh	G4 S3S4	SOC	SV	4
<i>Rana boylei</i> Foothill yellow-legged frog (SC in WV ecoregion; SV elsewhere)	CR, KM, WC, WV; CA Coos, Curr, Doug, Jack, Jose, Klam, Lane, Linn, Mari	G3 S2S3	SOC	SC/SV	2
<i>Rana cascadae</i> Cascades frog	EC, KM, WC; CA, WA Clac, Desc, Doug, Hood, Jack, Jeff, Klam, Lane, Linn, Mari, Mult, Wasc	G3G4 S3S4	SOC	SV	4
<i>Rana luteiventris</i> Columbia spotted frog (SC in BR and CB ecoregions; SV elsewhere)	BM, BR, CB; ID, NV, WA + Bake, Croo, Gran, Harn, Jeff, Lake, Malh, Umat, Unio, Wall, Whee	G4 S2S3	C	SC/SV	2
<i>Rana pretiosa</i> Oregon spotted frog	EC, WC, WV; CA, WA Bent, Clac, Colu, Croo, Desc, Hood, Jack, Jeff, Klam, Lane, Linn, Mari, Mult, Polk, Wasc, Wash, Yamh	G2 S2	C	SC	1
<i>Rhyacotriton cascadae</i> Cascade torrent salamander	WC; WA Clac, Hood, Lane, Linn, Mari, Mult	G3 S3	--	SV	4
<i>Rhyacotriton kezeri</i> Columbia torrent salamander	CR; WA Clat, Colu, Polk, Till, Wash, Yamh	G3 S3	--	SV	4
<i>Rhyacotriton variegatus</i> Southern torrent salamander	CR, KM, WC, WV; CA Bent, Coos, Curr, Doug, Jose, Lane, Linc, Polk, Till, Yamh	G3G4 S3	SOC	SV	4
<i>Taricha granulosa mazamae</i> Crater Lake newt	EC Klam	G5T1Q S1	--	--	1
REPTILES					
<i>Actinemys marmorata</i> Western pond turtle	BM, CR, EC, KM, WC, WV; CA, NV, WA Bent, Clac, Colu, Coos, Curr, Doug, Hood, Jack, Jose, Klam, Lane, Linn, Mari, Mult, Polk, Till, Wasc, Wash, Yamh	G3G4 S2	SOC	SC	2
<i>Chrysemys picta</i> Painted turtle (only C. p. bellii SC)	BM, CB, WC, WV; ID, WA + Bake, Bent, Clac, Colu, Gran, Hood, Lane, Linn, Mari, Morr, Mult, Polk, Sher, Umat, Unio, Wall, Wasc, Wash, Yamh	G5 S2	--	SC	2
<i>Crotalus oreganus</i> Western rattlesnake (SC in WV ecoregion only)	BM, BR, CR, EC, KM, WC, WV; CA, ID, WA + Bake, Bent, Coos, Croo, Curr, Desc, Doug, Gill, Gran, Harn, Hood, Jack, Jeff, Jose, Klam, Lake, Linn, Malh, Mari, Morr, Sher, Umat, Unio, Wall, Wasc, Whee	G5 S5	--	SC	4

Scientific Name Common Name	Ecoregion; Adjacent States Oregon Counties	Heritage Rank	Federal Status	ODFW Status	ORBIC List
<i>Lampropeltis getula</i> Common kingsnake	EC, KM, WC; CA, NV + Curr, Doug, Jack, Jose, Klam	G5 S3	SOC	SV	4
<i>Lampropeltis zonata</i> California mountain kingsnake	CR, EC, KM, WC; CA, WA, Mexico Curr, Doug, Jack, Jose	G4G5 S3S4	SOC	SV	4
<i>Sceloporus graciosus graciosus</i> Northern sagebrush lizard (SV in CB ecoregion only)	BM, BR, CB, EC; CA, ID, NV, WA + Bake, Croo, Desc, Gill, Gran, Harn, Jeff, Klam, Lake, Malh, Morr, Sher, Umat, Wasc, Whee	G5T5 S5	SOC	SV	4
<i>Sonora semiannulata</i> Ground snake	BR; CA, ID, NV + Harn, Malh	G5 S3	--	--	4
BIRDS					
<i>Accipiter gentilis</i> Northern goshawk	BM, BR, CB, CR, EC, KM, WC, WV; CA, ID, NV, WA + Bake, Bent, Clac, Coos, Croo, Curr, Desc, Doug, Gran, Harn, Hood, Jack, Jeff, Jose, Klam, Lake, Lane, Linc, Linn, Malh, Mari, Morr, Mult, Umat, Unio, Wall, Wasc, Whee	G5 S3S4	SOC	SV	4
<i>Aechmophorus clarkii</i> Clark's grebe	BM, BR, CR, EC, KM, ME; CA, NV, ID, WA + Clat, Colu, Coos, Curr, Doug, Harn, Jack, Klam, Lake, Lane, Linc, Till	G5 S3B,S2N	--	--	4
<i>Aechmophorus occidentalis</i> Western grebe	BM, BR, CR, EC, KM, ME, WC, WV; CA, NV, ID, WA + Clat, Colu, Coos, Curr, Desc, Harn, Jack, Klam, Lake, Lane, Linc, Linn, Mult, Polk, Till, Wash	G5 S3B,S2S3N	--	--	4
<i>Aegolius funereus</i> Boreal owl	BM, EC, WC; ID, WA + Bake, Clac, Desc, Gran, Hood, Jeff, Klam, Lane, Linn, Mari, Umat, Unio, Wall, Wasc, Whee	G5 S3?	--	--	3
<i>Agelaius tricolor</i> Tricolored blackbird	BM, CB, EC, KM, WV; CA Jack, Klam, Lake, Mult, Umat, Wasc, Whee	G2G3 S2B	SOC	--	2
<i>Ammodramus savannarum</i> Grasshopper sparrow	BM, BR, CB, KM, WV; CA, ID, NV, WA + Bake, Doug, Gill, Harn, Jack, Lane, Linn, Malh, Morr, Polk, Sher, Umat, Wall, Wasc	G5 S2B	--	SV	2
<i>Amphispiza bilineata</i> Black-throated sparrow	BM, BR, CB; CA, ID, NV, WA + Croo, Desc, Harn, Klam, Lake, Malh, Morr, Whee	G5 S3B	--	--	4
<i>Anser albifrons elgasi</i> Tule goose	BR, EC; WA Harn, Klam, Lake	G5T3 S2S3N	--	--	1
<i>Aquila chrysaetos</i> Golden eagle	BM, BR, CB, CR, EC, KM, WC Bake, Clac, Coos, Croo, Curr, Desc, Doug, Gill, Gran, Harn, Hood, Jack, Jeff, Jose, Klam, Lake, Lane, Linn, Malh, Mari, Morr, Mult, Sher, Umat, Unio, Wall, Wasc, Whee	G5 S3	--	--	4
<i>Artemisiospiza belli</i> Sage sparrow (SC in CB ecoregion only)	BM, BR, CB, EC; CA, ID, NV, WA + Bake, Croo, Desc, Gill, Harn, Jeff, Lake, Malh, Morr, Umat, Whee	G5 S4B	--	SC	4
<i>Asio flammeus</i> Short-eared owl	BM, BR, CB, CR, EC, KM, WC, WV Bake, Bent, Clac?, Clat?, Colu?, Coos?, Croo, Curr, Desc, Doug, Gill, Gran, Harn, Hood?, Jack?, Jeff, Jose?, Klam?, Lake, Lane, Linc?, Linn, Malh, Mari?, Morr, Mult, Polk?, Sher, Till?, Umat, Unio, Wall, Wasc, Wash?, Whee, Yamh?	G5 S3	--	--	3
<i>Athene cunicularia hypugaea</i> Western burrowing owl (SV in BR ecoregion; SC elsewhere)	BM, BR, CB, CR, EC, KM, WV; CA, ID, NV, WA + Bake, Bent, Coos, Croo, Desc, Doug, Gill, Gran, Harn, Jack, Jeff, Jose, Klam, Lake, Lane, Linn, Malh, Morr, Sher, Umat, Unio, Wall, Wasc, Whee	G4T4 S3B	SOC	SC/SV	4
<i>Baeolophus ridgwayi</i> Juniper titmouse	BR, EC? Harn?, Klam?, Lake, Malh	G5 S3	--	--	4
<i>Bartramia longicauda</i> Upland sandpiper	BM, EC; ID, WA + Croo, Gran, Klam, Lake, Umat, Unio	G5 S1B	SOC	SC	2









3/18/2016 - ODFW Commission Meeting regarding Division 44 new proposal

To the Wildlife Commission Members:

Although I appreciate the fact that ODFW needs to know where and how native wildlife is housed, I feel the new proposed ban on the keeping of native species by anyone other than AZA facilities is far too restrictive and actually encourages individuals to take species from the wild. Currently, there are rules in place that allow citizen to bring in captive bred native wildlife from other states. It must be from a USDA licensed facility, health checked by a veterinarian and brought into the state with an import permit number issued by Oregon Dept. of Agriculture. This process allows an interested person a legal means to bring in a healthy, disease free animal. If the current Division 44 proposal is adopted there will be no legal means for Oregon citizens to keep native wildlife in captivity. I think that most people prefer to do things legally and are willing to jump through some hoops in order to acquire what they want. But when you put a complete ban on an activity many people will just find another way to go about getting what they want. I feel this ban will encourage people to either bring in animals illegally from out of state or take baby animals from the wild and keep them secretly so as not to get caught. When animals are kept "under the radar" they are less likely to receive proper care and almost never receive any needed veterinary care. Rather than implementing a ban, I would like see ODFW create a permitting process by where anyone can acquire a **captive bred** native species if they have an appropriate, safe facility to house the animal. There are already laws in place in Oregon to keep wild canids, felids, ursidae, crocodilians, etc. out of the hands of anyone not licensed and inspected by the USDA. State laws already in place limit the keeping of inherently dangerous animals to facilities that are licensed and inspected on a regular basis.

I feel strongly that limiting exemption of Division 44 rules only to AZA facilities is not only unfounded, but unfair. AZA accreditation is not available or affordable to the majority of facilities and for others an AZA membership is not only financially burdensome, but it also interferes with their current breeding programs. It's a fact that AZA facilities have just as many escapes and incidents of injury as USDA facilities. There have been two incidences in the past week in zoos, both municipal AZA accredited zoos. (a polar bear escaping it's exhibit and a cougar scaling a wall and eating a koala) Adopting AZA caging requirements is not objectionable to me, although in the case of many small animals it may be excessive. I have legally kept cougar in the State of Oregon for 20 years. I have never had an escape or an attack on a keeper. I built my cage to state specifications and had my caging inspected and approved by ODFW. I am inspected by the USDA annually. As a side note, anyone can go on the USDA APHIS web site and view inspection reports and inventories. So exempting USDA facilities in addition to AZA facilities does not add any additional work or oversight to ODFW. I must follow the same AWA standards, purchase the same USDA license and am inspected by the same inspector that inspects AZA facilities. I have heard the argument repeatedly that anyone who wants an animal currently banned by State law to private individuals can simply acquire a USDA license and get one. This is untrue, as a person must have an animal related business to get a USDA license, and additionally, a person must prove they have adequate experience before being allowed to keep inherently dangerous animals. I don't have a problem with having to obtain a permit from ODFW to keep my cougars or to have my cages inspected by an additional agency. I feel an annual inspection by ODFW would be redundant and unnecessary, but not objectionable.

The Division 44 proposal requires persons wanting to grandfather their animals to purchase a holding permit for their animals, but limits the number of animals allowed on the permit to either one or two animals, depending on the species. It also states that animals can only be transferred to AZA facilities (which don't take in private pets) without the director's approval. I don't think this was well thought out. What does ODFW suggest a person do with animals in their possession exceeding those limits? How is a person supposed to decide which one or two to keep? Euthanasia appears the only option for animals that exceed those limits. Euthanasia of healthy animals is a violation of the Federal AWA and would result in fines and punishment by the USDA. There should be no limits to the number of animals a facility can grandfather in. Eliminating this restriction would not result in any additional work for ODFW.

The committee that wrote the proposed Division 44 rules did not include anyone from private industry. We asked repeatedly to be represented on this committee and were refused. As a result, I don't feel that the members of this committee understand or even care about the **commercial** aspect of keeping native wildlife in Oregon, and therefore, this proposal contains many restrictions that will harm Oregon businesses and Oregon wildlife, and it creates an unfair advantage to a select few large corporate entities. I ask that you consider changing portions of the rules to make them more equitable.

Respectfully,

Molly Schaefer
Salem, OR

To Whom it May Concern;

We at A Walk on the Wild Side Zoological Conservation Facility, would be impacted by the proposed laws passing in many ways. Such as the fee's for having our animals, we house several animals that would be affected by the current changes. We are a 501(c)(3) Non Profit Rescue, with a budget almost always in the negative side.

We have been working for years with Fish and Wildlife educating the public about reptiles that are prohibited in Oregon. With well over 2 million people yearly going through our exhibits. We see more people in a single year than all of the combined Fish and Wildlife personal could ever see. We currently hold a special license to poses and house reptiles, no other people can. In addition we work with ODA as a special spokesperson for alligators and crocodiles.

We of course hold a USDA Class C exhibitor license. And currently house many exotic animals that are almost virtually extinct. As well as Native, indigenous species. Including that of Skunks, Bobcat's, and Bear. Which aren't currently on the endangered list. By not being able to breed or poses many of the animals on your list it will effect A Walk on the Wild Side financially. And also on the level of helping assist Fish and Wildlife educating the public.

We ask that you reconsider the current proposed laws, as we here at A Walk on the Wild Side oppose the current proposed law changes.

Thank you,

Steve Higgs

A Walk on the Wild Side
Zoological Conservation Facility
CEO/Founder

junglewild80@gmail.com

[\(503\)737-4917](tel:5037374917)

To the ODFW Wildlife Division Staff,

In response to the stakeholder letter I received, I have reviewed and commented on your proposed changes to the Division 044 Rules (below). My comments are divided into two parts: Part 1 is a general summary, and Part 2 contains specific comments on individual rules.

These comments are based on 20 years' experience as a professional herpetologist, and an equivalent amount of time working with multiple amphibian and reptile interest groups. They pertain to the proposed rules only: Nothing in these comments is intended as a criticism of any ODFW employee, either current or former, and should not be interpreted as such.

Sincerely,

Chris Rombough
03 March 2016

Comments on proposed changes to OAR Division 44 Rules 01 March 2016

Part 1: Summary of comments

In response to the stakeholder letter that I received, I have reviewed the proposed changes to Division 044 rules, with respect to amphibians and reptiles. My general impression is that the rules, while well-intentioned, are not well thought out and will create a series of problems where none currently exist.

The first major issue with these rules is their apparent lack of a scientific basis. With respect to amphibians and reptiles, there is no clearly stated need for the change in regulations. Thus, it is unclear why they are being proposed. I am aware of no evidence that individual take and/or holding of amphibians or reptiles is a concern that needs to be addressed. On the contrary, my experience with a range of herp-related groups indicates that very little interest in the collection of Oregon species exists. In addition, there are no scientific data supporting the reclassification of most of the proposed species (racers, rubber boas, ringneck snakes, *etc.*) as “protected”. In fact, the majority of existing data indicates that these species have some of the largest and most stable populations in Oregon. That the proposed reclassification is at odds with currently available data begs the question of what, if any, information is really being used to support this decision. Reliance on ORBIC as the sole source of information is both inaccurate and disappointing (see *Part 2*, below). There are a number of good herpetologists in Oregon and adjacent states: which of these were on the advisory group that formed the rules?

The second major issue with the proposed rules is that they appear to have been written without consideration of constituent demographics. There are a number of distinct groups of people who will be affected by these rules, and each group will be affected differently. Some of the most important are “field herpers”, educators, and pet owners:

Field herpers

These rules, and their interpretation by Department staff, will make it illegal to find and observe (*i.e.*, look for, photograph, catch-and-release – see *Part 2*, below) most popular reptiles and amphibians in the wild. (This is what the proposed rules, as written, state. More importantly, this is apparently how they will be interpreted. It has been explained to myself and others *by an ODFW biologist* that it is illegal to touch native reptiles and amphibians without a permit, especially in the case of protected species.) If the results of other states are any indication, this will result in a dramatic increase in field herping; however, it will be conducted in secret.

Educators

These rules will end most education involving live animals. Most non-native amphibians are illegal in Oregon, and Scientific Taking Permits to use native species are too difficult for most teachers to get. Thus, most educators use nonprotected native species (*e.g.*, treefrogs) for teaching. The requirement of a Wildlife Holding Permit to use even common species will be too much for most teachers, and they will simply remove animal-based education from their curriculum, rather than risk getting in trouble.

Pet owners

The conditions of the Wildlife Holding Permit guarantee that very few people will apply for one. (This is especially true for the \$150 inspection fee and the fact that a permit holder's home can be searched at any time.) This will result in people either releasing their animals or keeping animals in secret, releasing them at such time as they feel threatened (see *Part 2*, below). The fact that 'grandfathering' animals requires the same permit and application process will only exacerbate this problem.

The prohibition of federally-listed endangered species will also be extremely unpopular, since many of the species that are currently popular as pets come from captive stocks that were established before the parent species became endangered in the wild. The original Wildlife Integrity Rules passed by the Department in 1996 prohibited a large number of popular species and specifically allowed the possession of species that will now be illegal under the proposed rules. This caused many pet owners to give up then-prohibited species in favor of those which were previously allowed and will now be illegal. Consequently, this law will probably be extremely unpopular and will result in noncompliance, as well as release of animals.

For example: In 1996, the Department adopted the "Wildlife Integrity Rules" (OAR 635-056). These rules outlawed the possession of a number of popular pet reptiles, including the red-eared slider (*Trachemys scripta elegans*). Under the rules, a permit (Prohibited Species Permit) was required to keep sliders. Although the rules included a "grandfathering" clause (635-056-0150), it was not known to most pet owners. Upon contacting Department staff, many applicants were told that a permit was required to legally retain possession of previously held pets. (I can provide evidence of just such an exchange.) The permit application process required a home inspection and a lengthy application that was judged too difficult by many people.

Beginning in the late 1990s, I conducted a study of the ecology and demography of the red-eared slider in western Oregon. Although never formally published, the results were striking: Almost all of the self-sustaining (naturally reproducing) populations that I examined did not exist prior to 1996. This pattern is evidence of the reaction of pet owners who saw themselves faced with the choice of releasing their pet or violating the law. When told that surrendered pets would be euthanized, people were even more galvanized toward release. As a consequence of a single law, feral populations of sliders were established across western Oregon. A repeat of this problem could be prevented with a little thought and foresight – especially regarding the conditions of the Wildlife Holding Permit.

In summary, I predict that these rules will be extremely unpopular. If the Department passes them as they are written, the most likely consequences include:

- large-scale noncompliance
- development of a constituency that dislikes and distrusts the Department
- increased illicit exchange of reptiles and amphibians
- dramatic increase in the number of released animals (both native and exotic)
- loss of potential collaborators and the opportunity to collect valuable data that the Department lacks the funding and skills to gather
- a severe crippling of environmental and natural science programs

These possibilities require some careful thought: Can the Department afford to take the chance of alienating so many constituents? Enforcement of these laws will be extremely difficult, as it will require the ability to identify a wide range of similarly-appearing amphibian and reptile

species. Consider: the wording of these rules ensures that the people who do follow them will suffer a heavy burden (financial, application, reporting) for their efforts. In contrast, those who choose not to obey the law will, in most cases, not suffer at all. When faced with those choices, most people are likely to pick the latter. Severe punishment ("making an example") of those who are caught breaking the law will most likely have little effect on illegal activity. On the contrary, it will likely just widen the rift between the Department and a given user group. This type of prohibitive approach has been tried in a number of other states, and has repeatedly failed.

Given all the potential problems, the question is this: Why take such an unnecessary risk for no clear or immediate benefit? If the desire is just to create policy for the sake of creating policy, then by all means, go ahead. But if the purpose is to really benefit Oregon's amphibian and reptile species, then why not proceed a little more thoughtfully?

In 2007, I proposed to (then ODFW Director) Roy Elicker a simple program for the scientific conservation of Oregon's amphibians and reptiles, which would both incorporate public involvement and generate funding for itself. The design was based in part on consideration of the successes and failures of other states, examples of which were provided. Although there was no interest in such a program at that time, the fact that I was able to devise it illustrates that, with a just little planning and thought, a solution could be found that benefits both Oregon's wildlife and its people.

Part 2. Specific comments on individual rules

635-044-0005-- Protected Wildlife

(1) This rule, in conjunction with the provisions of part (e) and (f) would make it illegal to touch additional species of reptiles and amphibians in the field. This is true of both the rule's wording and its interpretation. (With respect to the latter, I have been told by a Department biologist that "touching an amphibian or reptile without a permit is illegal". Others have asked and gotten the same response. I can provide written evidence of this; it is beyond question.)

Several of the amphibians and reptiles proposed for addition to the list of protected species are popular subjects of harmless observation for many people (see parts (e) and (f), below). It is important to understand that finding, observing, and photographing amphibians and reptiles in their natural state ('field herping') is an extremely popular and rapidly growing activity in the United States. Unlike birds, many species of amphibians and reptiles are secretive creatures that must be captured in order to see and/or identify them. Although often depicted as unscrupulous collectors, the vast majority of amphibian and reptile enthusiasts ('herpers') are skilled in methods of detection and safe capture, and usually leave animals exactly where they were found. There is an informal code of conduct among herpers which condemns habitat destruction, harassment of animals, and poor conduct in the field. In addition, data collected by herpers are frequently used by agencies, universities, and citizen science mapping efforts. Making such activity illegal is counterproductive, since agencies often benefit from the data produced.

To date, a number of states have prohibited field herping in just such a manner as is proposed here, making it illegal to search for or touch animals in the field. In most such states, the result has been widespread resentment of the responsible agency and a corresponding increase in the prohibited activity. In the majority of cases, illegal herping is nearly impossible to enforce. The few cases that are successfully prosecuted have resulted in increased resentment of

enforcing agencies. The current state of the field herping hobby in Oregon is such that a strong negative relationship with the Department has not yet developed. This will probably not be the case if the proposed rules are adopted.

(1)(a) This rule overlooks the fact that many federally listed amphibian and reptile species, although declining in the wild, are frequently bred in captivity and are widely available in the pet trade.

For example: the axolotl (*Ambystoma mexicanum*), although critically endangered in the wild, has been bred in the millions as a subject for laboratory research and is available in the pet trade worldwide. (It is also one of the few pet salamanders which are currently legal in Oregon per OAR 635-056-0060.) The black pine snake (*Pituophis melanoleucus lodingi*) has been bred in captivity for decades, and captive specimens are available in multiple color forms, with breeding lineages traceable for many generations. It is also currently legal in Oregon (as per OAR 635-056-0060), since all color forms are easily distinguishable from native species (*Pituophis catenifer*). It was recently listed as Threatened under the ESA; however, captive lineages were established decades in advance of the species' decline in the wild. Many more examples are available, but the point is made.

Passing the proposed rule will outlaw a number of species which are captive-bred in large numbers, commercially available, and legal in Oregon. This will probably be hugely unpopular and result in a large degree of non-compliance and/or released animals, since many of these species will include long-term pets that owners will be reluctant to give up or report. In addition, it will create an extremely complex situation with respect to enforcement, since the captive and wild populations of a given species are mutually exclusive of each other. Therefore, as wild populations decline and are listed, the list of illegal ('prohibited') pet species will have to be continually updated. Each time a listing results in the outlawing of a popular captive-bred species, a new public outcry may be expected.

Finally, a large number of the species listed as legal by the Wildlife Integrity Rules (OAR 635-056-0060) have some sort of federal status (threatened or endangered), and had such status at the time they were originally listed. Making them illegal now will be probably be perceived by many of the public who have tried to comply with the original Integrity Rules as a 'bait-and-switch'.

(1)(a) The use of ORBIC as a sole source of information is inappropriate and unscientific. Although a useful tool, it is just that – a single tool. It is a ranking system, not an accurate means of assessing population status. ORBIC rankings are not based on population surveys or even comprehensive trend data. I know – I have contributed data to ORBIC since it was the Oregon Natural Heritage Database.

The nature of ORBIC, its component data, and the methods used by its contributors all mean that it is biased against detection of secretive species, including many of Oregon's amphibians and reptiles. This should not be a surprise: there is a vast body of literature addressing detectability of amphibians and reptiles, including the deficiencies of many of the sampling methods used by ORBIC contributors (*see* Mazzerolle et al. 2007, Durso and Seigel 2015, O'Donnell and Semlitsch 2015). The limits of the ORBIC database can easily be addressed by inclusion of other sources of data, of which there are many. If this seems like too much work, consider: is a sole, third-party, unquantified source of information a sufficient resource for the Department when making decisions regarding black bears or white sturgeon? What about

mallard ducks or sandhill cranes? Accurate census data are a required part of the successful management of any wildlife species. Why not amphibians and reptiles?

(e)(J) Dunn's salamander (*Plethodon dunni*). This species has a larger range in Oregon than does the unprotected western red-backed salamander (*P. vehiculum*), and reaches equally high densities in suitable habitat. Thus, it is unclear as to why this species is proposed for addition to the protected list.

(e)(K) Southern torrent salamander (*Rhyacotriton variegatus*). This species is already listed as 'protected' under OAR 635-044-0130. It is unclear why it is being included as an addition here.

(e)(L) Columbia torrent salamander (*Rhyacotriton kezeri*). This species is already listed as 'protected' under OAR 635-044-0130. It is unclear why it is being included as an addition here.

(e)(M) Cascade torrent salamander (*Rhyacotriton cascadae*). This species is already listed as 'protected' under OAR 635-044-0130. It is unclear why it is being included as an addition here.

(e)(N) Crater Lake Newt (*Taricha granulosa mazamae*). This is not recognized as a valid subspecies of *T. granulosa* by the SSAR (Crother 2012), the reference on which the nomenclature of the OARs are based. It was initially described as a subspecies of *T. granulosa* on the basis of morphology (melanistic inclusions on the ventral surface; Myers 1942). However, the discovery of newts with the same morphology elsewhere, coupled with a lack of other differentiating characters, led to a lack of recognition of this subspecies. From a practical standpoint, since newts from a range of other localities (both high- and low-elevation populations; Garber and Garber 1978, Nussbaum et al. 1983, C. Rombough, *unpubl. data*) look the same as those from Crater Lake, distinguishing the two forms is at present functionally impossible. Furthermore, as they occur in a National Park, the newts of Crater Lake are already protected by United States Federal law.

(f)(K) Racer (*Coluber constrictor*). This is one of the most abundant and widespread snakes in Oregon, as indicated by numerous data and multiple sources of information. It is both a habitat and dietary generalist, and one of the few egg-laying species that can survive in marginal and moderately developed habitats. It exhibits a wider range and uses more types of habitat than many of the reptile species listed as 'secure'. It is unclear why this species is proposed for inclusion as 'protected'. I question the data supporting such a decision and suggest they should be seriously evaluated. See comments regarding the use of ORBIC as a sole data source (*above*).

(f)(L) Rubber boa (*Charina bottae*). As with the racer, this is a habitat generalist with one of the largest ranges of any Oregon reptile. Because it is secretive and fossorial, it is rarely seen by any but those who are actively searching for it. Nonetheless, it has been demonstrated to be abundant across a range of habitats. Poor detectability should not be confused with low abundance. I suggest that you reference Hoyer (1974), Hoyer and Stewart (2000), Hoyer (2001) for more information on this topic. See comments on the use of ORBIC as an information source (*above*). In addition, this species is now being bred in captivity with increasing frequency. It is

very likely that listing of this species as 'protected' (and requirement of a holding permit to keep existing pets) will result in the release of animals not indigenous to the state.

(f)(M) Night snake (*Hypsiglena chlorophaea*). As with the preceding two snakes, this species is much more widespread and abundant than ORBIC distribution data indicate. It is simply difficult to detect unless one is specifically looking for it. As an illustration of this, see Diller and Wallace (1984), Weaver (2008), Weaver (2010a), Weaver (2010b).

(f)(N) Striped whipsnake (*Coluber taeniatus*). This is a species which is now being bred in captivity, albeit in small numbers. As with other captive-bred species, the release of non-indigenous specimens may result from prohibition.

(f)(O) Ring-necked snake (*Diadophis punctatus*). As with the preceding two snakes, this species is much more widespread and abundant than ORBIC distribution data indicate. Much like other fossorial snakes (e.g., *Charina*, *Contia*, *Hypsiglena*) it is simply difficult to detect unless one is specifically looking for it. As an illustration of this, see Feldman and Hoyer (2010). As with the rubber boa, this species is now being bred in captivity, and release of non-indigenous specimens is likely to occur if this species is listed as 'protected'.

635-044-0015– Permit Required to Hold Wildlife

(1) This rule does not account for either the needs of constituent groups or the life histories of listed taxa. Adoption will likely result in the widespread release of captive animals.

For example: Pond-breeding amphibians are almost never collected as adults. They are typically collected as eggs and raised through the larval (tadpole) stage. This is done not just by individuals, but also by schools, who have used it as a valuable educational activity for decades. Because nobody collects just two eggs of a given species, they are left with a number of young frogs or salamanders when the animals transform. The prospect of killing a number of these to comply with the two animal limit will, in most cases, prompt clandestine release. (The conditions of the Wildlife Holding Permit make it unlikely that many people will apply – *see below*.) Considering the acquisition method of most amphibians (as eggs), setting a more realistic number of animals that are allowed without a permit, such as 10 or 20, would greatly reduce the rate of released captives.

Many reptiles are capable of storing sperm for long periods of time: several years or more. (In addition, parthenogenesis has been recently documented in a number of reptile species, including boids and garter snakes; *see* Germano and Smith 2009, Booth and Schuett 2015.) This means that a single, legally acquired animal may well reproduce without having been deliberately bred by the owner. A person who finds themselves in such a situation will probably choose to release captives rather than kill the offspring or apply for a permit. (Consider: anybody attempting to remain below the two animal limit is doing so in order to avoid applying for a permit.) As with amphibians, raising the number of allowed non-permitted animals to 5 or 10 would allow legal accommodation of unplanned offspring without prompting release of captives.

Arguments that keepers will deliberately breed animals if more than two are allowed generally lack validity. The majority of Oregon amphibian and reptile species are more difficult to breed than one might expect. Reproduction is regulated by complex endocrine cycles that are

triggered by seasonal changes in photoperiod and temperature. It requires careful manipulation of the animals' environment to get most species to reproduce successfully.

A two animal limit has been attempted by a number of other states, with generally poor success. Two animal limits are typically very unpopular, and often result in the underground exchange or release of animals that would otherwise be retained by the owner and typically pose no problem. Finally, no scientific basis has been provided for the establishment of a two animal limit. Why two, as opposed to three, five or ten? Where are the data that suggest a species can sustain take of two individuals but not more?

In summary, a two animal limit is impractical and is expected to be unpopular. The most likely result of this limit is an increase in clandestinely owned animals (noncompliance) and in release of captives. This could be alleviated by either increasing the number of animals allowed without a Holding Permit or changing the conditions by which a Holding Permit can be obtained.

635-044-0030– Holding of Nongame Wildlife

(1) As stated above, the sole use of ORBIC as a basis for management decisions is inadequate. There are a number of information sources besides ORBIC that should be used to determine species' status. Also as stated above, the establishment of a two animal limit does not take the life history of a given taxon into account and will most likely result in a release of animals.

(1)(a) There are 31 species of reptiles in Oregon. 15 species are listed as "protected" (under the proposed OARs: 635-044-0005), and eleven species are on this list. Where are the other five species? If they are not protected, what is their status? Why can they not be held?

635-044-0035 – Cost and Expiration Date, and Changes to a Wildlife Holding Permit

(1)-(6) The terms of the Wildlife Holding Permit are too strict for most people. Although they may be intended to discourage application and hence reduce the number of wildlife held, they are more likely to result in noncompliance. Replacing the Wildlife Holding Permit with a permit required to take wildlife, but for which annual renewal is not required, is much more likely to promote compliance and will provide the Department with much more accurate data on the number of animals actually taken.

635-044-0045– Inspection of Facilities

(1) This rule will probably be the least popular aspect of the Wildlife Holding Permit, and the aspect that results in the greatest noncompliance by individuals.

(2) From the standpoint of individual compliance, this only makes the situation worse.

635-044-0050 – Ownership of Captured Wildlife Held in Captivity

(2) Passing this rule (requiring the possession of a Wildlife Holding Permit for animals legally acquired from an out-of-state propagator) will probably result in the release of a large number of captive animals by people who do not wish to apply for a Wildlife Holding Permit.

The writers of this rule fail to realize that there are already a large number of captive-bred animals of native species in Oregon. For example, considering reptiles alone, these include:

rubber boas, ringneck snakes, gopher snakes, kingsnakes (two species), striped whipsnakes, alligator lizards (two species), and a number of other lizard species. Many of these animals now come from out-of-state breeders, who have succeeded in propagating them in captivity. Faced with the prohibition of such animals, many owners will opt to release them. Thus, diseases potentially acquired in other states could be transmitted to wild populations in Oregon.

635-044, Exhibit 1: Caging Standards: Amphibians and Reptiles

The standards described in this section are inadequate, suggesting a lack of effort and/or experience in their creation. This is significant, as it has the potential to legally force keepers to maintain animals in conditions which are not optimal, in order to comply with the law.

For example, the minimum caging requirements for amphibian eggs fail to account for the difference in the oxygen carrying capacity with temperature. Consequently, what is a sufficient amount of water for a given number of eggs at 40 F (4.4 C) is insufficient at 65 F (18.3 C). Caging standards for metamorphosed amphibians and for reptiles are also inadequate: While large or active species benefit from spacious enclosures, large cages are often detrimental for a number of species and/or life stages. Small and/or newly transformed amphibians of many species can be difficult to feed and are prone to dehydration in large cages. Young snakes of many species are prone to desiccation and stress (leading to non-feeding) if kept in enclosures that are too large. For these reasons, best husbandry practices for many species involve raising young in small enclosures, then graduating them to larger ones as they grow. Yet, this practice would constitute noncompliance with the proposed rules.

The category of 'amphibians and reptiles' includes a range of vastly different animals with very different husbandry requirements. Unless the Department is willing to include carefully researched, detailed care requirements for each species at each stage of their lives, it may be better to simply require that animals be kept according to the 'best husbandry practices' for a given species. There is a wealth of information on the proper care of amphibians and reptiles, and several popular magazines are devoted almost entirely to this topic, making it very easy for potential keepers to get information.

References

Booth, W.; and G.W. Schuett. 2015. The emerging phylogenetic pattern of parthenogenesis in snakes. *Biological Journal of the Linnean Society* 2015:1-15.

Crother, B.I., *Ed.* 2012. Scientific and standard English names of amphibians and reptiles of North America north of Mexico, with comments regarding confidence in our understanding. Society for the Study of Amphibians and Reptiles Herpetological Circular No. 39.

Diller, L.V.; and R.L. Wallace. 1984. Aspects of the life history and ecology of the Desert Night Snake *Hypsiglena torquata deserticola*: Colubridae, in southwestern Idaho. *Southwestern Naturalist* 31:55-64.

Durso, A.M.; and R.A. Seigel. 2015. A snake in the hand is worth 10,000 in the bush. *Journal of Herpetology* 49(4):503-506.

Feldman, C.R.; and R.F. Hoyer. 2010. A new species of snake in the genus *Contia* (Squamata: Colubridae) from California. *Copeia* 2010(2):254-267.

Garber, D.P.; and C.E. Garber. 1978. A variant from of *Taricha granulosa* (Amphibia, Urodela, Salamandridae) from northwestern California. *Journal of Herpetology* 16:7-15.

Germano, D.J.; and P.T. Smith. 2007. Molecular evidence for parthenogenesis in the Sierra garter snake, *Thamnophis couchii* (Colubridae). *The Southwestern Naturalist* 55(2):280-282.

Hoyer, R.F. 1974. Description of a rubber boa (*Charina bottae*) population from western Oregon. *Herpetologica* 30:275-283.

Hoyer, R. 2015. Natural history of the rubber boa. Available online at: <http://www.rubberboas.com/Content/about.html>.

Hoyer, R.F.; and G.R. Stewart. 2000. Biology of the rubber boa (*Charina bottae*), with emphasis on *C.b. umbricata*. Part I: Capture, Size, Sexual Dimorphism, and Reproduction. *Journal of Herpetology* 34:248-354.

Hoyer, R.F.; and G.R. Stewart. 2000. Biology of the rubber boa (*Charina bottae*), with emphasis on *C.b. umbricata*. Part II: Diet, Antagonists, and Predators. *Journal of Herpetology* 34:354-360.

Mazzerolle, M.J.; L.L. Bailey; W.L. Kendall; J.A. Royle; S.J. Converse; and J.D. Nichols. 2007. Making great leaps forward: Accounting for detectability in herpetological field studies. *Journal of Herpetology* 41(4):672-689.

Meyers, G.S. 1942. Notes on Pacific Coast *Triturus*. *Copeia* 1942:77-82.

Nussbaum, R.A.; E.D. Brodie, Jr.; and R.M. Storm. 1983. Amphibians and reptiles of the Pacific Northwest. University of Idaho Press, Moscow, Idaho.

O'Donnell, K.M.; and R.D. Semlitsch. 2015. Advancing terrestrial salamander population ecology: The central role of imperfect detection. *Journal of Herpetology* 49(4):533-540.

Weaver, R.E. 2008. Distribution, abundance, and habitat associations of the night snake (*Hypsiglena torquata*) in Washington State. *Northwestern Naturalist* 89:164-170.

Weaver, R.E. 2010a. Activity patterns of the desert nightsnake (*Hypsiglena chlorophaea*). *The Southwestern Naturalist* 55(2):172-178.

Weaver, R.E. 2010b. Diet and reproduction of the desert nightsnake (*Hypsiglena chlorophaea*) in central Washington state. *Journal of Herpetology* 44:148-152.

To whom it may concern,

As Stakeholders in the outcome of revisions to Division 44 rules, we oppose the proposed changes to the holding, possession and transportation of captive bred and legally obtained domestic skunks. We therefore ask that domestic skunks not be included in these rules revisions.

Rather than reiterate any of the information that has already been presented, we would like to respectfully submit that any law or rule change costs money. Every dollar spent enforcing needless regulation of a non-existing problem reduces the funds available for more deserving issues such as habitat conservation.

With no real public interest, why expend the time and effort to reduce the existing options of Oregon residents by proscribing harmless, captive bred, domesticated skunks?

Domestic skunks present none of the risks with associated with native wildlife, especially large predatory mammals.

In support of this we offer the following comparison:

Leonardo DiCaprio attacked by a bear = High drama and an Academy Award

Leonardo DiCaprio attacked by a skunk = Family comedy and direct to video

Thank you for your consideration.

Mark Armstrong

Nikki Armstrong

Newberg, OR

Oregon Skunk Owners

Supporting Our Family Members
The Domestic Pet Skunk

Table of Contents

Introduction.....	Section 1
Why we oppose the ODF&W's Division 44	
Domestication.....	Section 2
Proof of Domestication	
Email By Pulitzer Winner, Professor Jared Diamond, UCLA	
What is Domestication?	
The Six Criterial of Domestication	
Information on Professor Jared Diamond, UCLA	
Adoption Requirements of the Humane Society.....	Section 3
Email Stating From PHS Representative	
Outdoor Dangers Outweigh the Benefits	
Animals vs Pet Skunks Given Up Each Year	
Audubon Society-	
Animal Abandonment	
Encouraging Indoors for Pets	
Non-native Animal Policy	
Caging The Wrong Animals.....	Section 4
Wrong Species/Wrong Cage	
Dr. Drago-Skunks are not in the weasel classification	
AZA Accredited Facility.....	Section 5
The Chances of Becoming Accredited-ZERO	
Rabies.....	Section 6
U.S. Humane Society-Understanding Rabies	
Bad Hamburgers and Lightening Strikes Kill More	
CDC-Human Rabies	
Information for Doctors	
Layman's View on Rabies	
Public Veterinary Medicine: Public Health	
CDC Rabies Surveillance	
AVA Rabies Information	
U.S. Humane Society-Rabies	
Rabies Deaths in the U.S. since 1951 (Table 1)	
Summary-Human Deaths by Skunks-ZERO	
Summary.....	Section 7
What we've done to be a Responsible Pet Owner	
Going beyond Responsible	

Introduction

As domestic pet skunk owners we oppose the ODF&W's Division 44 for the ban, tattooing, and caging of our pets.

Although Division 44 may be appropriate for some animals, it is not for our skunks. Some sections of the division are inhumane and should be reconsidered, revised, and removed.

The outdoor caging is an issue that concerns us as it will lead to the demise of our family members. They have been accustomed to living in a social, safe, caring home their whole lives. They have the freedom of roaming our homes just as other pets may do. A cat, a dog, a family member you may have in your home I am sure is not expected to live in an outdoor cage. Exposed to the adverse weather conditions, the risk of other animals, the stress and the anti-socialization.

After the years of living inside, then to be relocated to an outdoor cage would be inhumane. It would be as if you had to take one of your children, place them out on the porch and tell them "This is where you'll be living from now on." While the rest of your children and family members enjoy the comforts of your home, eating dinner, watching tv, warm and safe. This would be cruel and unacceptable.

Let them live the life that they've come accustom to....in our homes.

The section on lip tattooing is unnecessary. There are other ways to identify an animal. Some of our pets have been with us for over 10 years and would not survive a procedure of this kind. Just as cats, dogs, and rabbits receive microchips it is more plausible to have skunks receive this option.

This packet provides information on domestication. It is necessary to recognize the difference between wild and domestic. There are cats, dogs, and rabbits as pets, although we never address them as 'domestic cats', 'domestic dogs', or 'domestic rabbits'. All three of these species came from wild ancestors, as did our domestic skunks, but they are considered domestic which our skunks should be. All of them depend on humans for a safe, healthy, sociable life. Our pet skunks come from breeders who have bred skunks for over 80 years. Skunks were domesticated in Canada by farmers to control rodents and pests.

To purchase another skunk, to be a pet, you require that it be located in an AZA Accredited Facility. That would mean that we would need to become accredited to keep our pet in our home. The requirements, that are included in this packet, go beyond ludicrous. You want our homes to have 'strollers and wheelchairs for the public', 'Institutions Vet Program', 'Written euthanasia policy', 'Panic hardware for exits', and 64 other unobtainable expectations. Some Oregon facilities that are in existence struggle to maintain the AZA requirements. How can anyone or home meet these requirements.

As good pet owners we vaccinate our skunks. They receive distemper shots that are 'off-label'. Although we would prefer vaccines that are created for our skunks, at this time

they are not available. But we haven't found a domestic pet skunk that has been vaccinated with an 'off-label' distemper vaccine to be infected by distemper. Perhaps data should be maintained on this by the ODF&W to demonstrate these vaccines do work for skunks.

The US Humane Society's website gives us supporting evidence that rabies has many misperceptions. This is also included in this folder. The rapid decline of rabies incidents in the U.S., how more people are subject to lightning strikes or bad hamburgers. That fewer than 3 fatalities occur a year in the U.S. and that were mostly infected by bats. There has only been one recorded human fatality from a raccoon. They mention that rodents, rabbits, and hares rarely get rabies and have not been known to cause rabies among humans in the U.S. There has not been any records presented that shows a skunk causing rabies either, let alone a domesticated pet skunk.

This website also informs us that when there is timely treatment after exposure it is 100% effective. They state that rabies can only be transmitted through a bite.

The World Health Organization even recommends vaccination—rather than removal—of free-roaming dogs to control rabies. We should take this into consideration when skunks are euthanized to check for rabies. Quarantine for a period of time, and post-exposure treatment would be a more humane avenue.

Thank you for taking the time to view this packet and consider all the information we have presented.

**What is
Domestication?
What is the
Criteria?**

From: Jared Diamond
Sent: Saturday, March 12, 2016 12:29 AM
To: Deborah Cipriani
Cc: mparadise59@yahoo.com
Subject: RE: Colors of skunks

Dictated but not proofed, by Professor Diamond

Dear Ms. Cipriani,

Thank you for your e-mail of March 9 about skunks. Here are some additional thoughts:

A standard definition of a domesticated animal is as follows, from page 159 of my 1997 book *Guns, Germs, and Steel*: "... A domesticated animal is defined as an animal selectively bred in captivity and thereby modified for its wild ancestors, for use by humans who control the animal's breeding and food supply."

By this definition, it is certain that the captive-born pet skunks have been domesticated, and that it is impossible to sustain the claim that domestic skunks are identical to wild skunks. The breeder picked his/her skunks, e.g. buying their first breeding pair and selecting an albino. The breeder did control the skunks' breeding, by having it in his/her power to decide which male skunk would be put together with which female skunk. The breeder did control the skunks' food supply. The domestic skunks did become modified from its wild ancestors: they have the vast color variation that you describe, rather than the black and white color of wild skunks. Therefore, you and Ms. Van Dyke don't have to do anything further to justify your assertion that captive-bred skunks are domestic skunks, not wild skunks.

I rechecked my calculation of 27 generations of captive breeding. The standard source book on mammals is: *Walker's Mammals of the World*. I have the sixth edition, published in 1999, and edited by Ronald Nowak. I know that there have been subsequent editions, and you should refer to the latest edition. But in that sixth edition, on page 736 of volume 1 where skunks are discussed, it is stated that female skunks may bear their first litter at one year, and that the average longevity of a skunk in captivity is about six years. Taking the average of one year and six years, that means that the average age of a mother skunk bearing young is three-and-a-half years. If the one breeding farm bought its first breeding pair around 1936 (you can check the exact year), that means 80 years, at 3.5 years per generation, or a total of 23 generations that domestic skunks have been continually subjected to captive breeding. You can ask animal breeders, but I expect that you will be told that 23 generations has been ample to produce changes in captive-bred rats, foxes, and other mammals.

Sincerely,

Jared Diamond
Professor of Geography

From: Jared Diamond
Sent: Wednesday, March 9, 2016 6:47 PM
To: Marilyn
Subject: RE: Desperate need of information about domesticated animals.

Dear Ms. Van Dyke,

Thank you for your e-mail. I don't have any information about differences between wild skunks and domesticated skunks. If such information doesn't exist or you can't find any, you might still be able to make an argument based on probabilities, as follows.

If your skunk and other domesticated skunks are derived from an unbroken line of individuals that have been continuously bred in captivity since the 1930's, then it is likely that that time has been sufficient for genetic differences to develop between domestic skunks and wild skunks. You could strengthen the argument if you know the generation time in captivity: that is the age at which a captive-bred skunk begins reproducing, and how long it continues to reproduce. For example, if domestic skunks start to breed at age one and mostly die or stop breeding by age five, then you could average one and five and say that the average generation time is three years. In that case, between 1936 and 2016, there would have been 80 divided by 3, or 27 generations, which is ample for genetic differences to develop during captive breeding.

If the Oregon Department responds that the burden of proof is on you to demonstrate genetic differences, your response would instead be that 27 generations of captive breeding suffice to produce changes in any animal, and the burden of proof is on the Department to defend its implausible claim that no differences have developed within 27 generations.

But I have no actual knowledge of how quickly genetic changes develop in captivity, so that you should ask experts who do have some knowledge of captive breeding (such as mouse breeders or cat breeders).

Crucial is the question whether domestic skunks have been bred continuously in captivity since the 1930's from wild animals initially brought into captivity then, and whether no further wild animals were subsequently brought into captivity to mix with that original line. If skunk breeders continually capture wild animals and mix them with the offspring of animals that were brought into captivity in the 1930's, then you could not claim that there have been 27 generations in which to accumulate genetic differences; the number of generations would be less, in the worst case just one generation if your skunk was born to wild animals that the breeders acquired last year; that would make it irrelevant that the breeders have been breeding skunks since the 1930's.

I hope that this reasoning will be useful. Again, I have no specific knowledge about domestic skunks; I'm just reasoning what would be the case depending on the number of generations in captivity; you should talk to some people familiar with changes in captivity in other species of captive-bred animals.

With best wishes,

Jared Diamond
Professor of Geography

What is domestication?

Domestication is when humans take a plant or animal species and, through selective breeding, transform the species into something beneficial for humans. Historically, there have been three major reasons why humans domesticate. The first is to create a ready source of food, such as taking the wild ancestors of cows and turning them into cattle. The second is to harness animals for work, which can range from transportation to use in war, with horses being the most obvious example of this. Then there's domestication that creates pets and companions for humans - dogs are a great example of this.

What makes an animal possible to domesticate?

The world's foremost expert on domestication is arguably UCLA Professor Jared Diamond, who is best known for his popular science books like the awesomely titled *Guns, Germs, and Steel*. In the book, he lays out six basic criteria that an animal has to meet in order to be possible to domesticate. Let's run through them briefly:

Advertisement

1. The animal needs to be able to eat a lot of different thing and be willing to live off the scraps of humans. If the animals are able to eat stuff humans can't, such as grass, then even better. This also makes strict carnivores somewhat more difficult to domesticate than other animals, as it commits humans to providing a ready food source of other animals for them to eat.
2. The animals need to grow up fast, or at least faster than humans. There's not much point in trying to domesticate extremely long-lived species like elephants or tortoises, as it can take several years before they're even remotely useful, and their long life cycle limits how quickly their numbers can be replenished.
3. The animals must be willing to breed in the close quarters of captivity. Any creature that demands a lot of open territory in order to breed - pandas and antelopes are good examples of this - are terrible domestication candidates.
4. The animals have to be naturally pleasant. An unpredictable or ill-tempered beast is just going to be dangerous to attempt to keep enclosed in a small area. It's possible to meet some animals halfway on this - for instance, the American bison can be kept in huge enclosures on ranches - but that's as close as we can get to full-on domestication for species like that.
5. It isn't just pleasantness - the animals need to be calm as well. Skittish or flighty animals will constantly attempt to escape, and it can be almost impossible to control them even if escape is impossible. This is what seems to have kept foxes from being successfully domesticated, as they're far more skittish than dogs and wolves.
6. The animals need to be willing to recognize humans as their new masters, which means they must have a flexible social hierarchy.

The remarkable thing about all this is that some animals that seem almost indistinguishable from their domesticated counterparts can prove to be incurably wild. The difference between foxes and dogs doesn't seem like very much, domestic pigs seem superficially very similar to the impossibly wild peccaries and warthogs, and zebras can even interbreed with the fully domesticated horses and donkeys...and yet outside a couple isolated cases of taming zebras, the species has proven completely impossible to domesticate.

Jared Diamond

Scientist

Jared Mason Diamond is an American scientist and author best known for his popular science books *The Third Chimpanzee*, *Guns, Germs, and Steel*, *Collapse* and *The World Until Yesterday*. Originally trained in physiology, Diamond is known for drawing from a variety of fields, including anthropology, ecology, geography and evolutionary biology. As of 2013, he is Professor of Geography at the University of California, Los Angeles.

Jared Mason Diamond is an American scientist and author best known for his popular science books *The Third Chimpanzee*, *Guns, Germs, and Steel*, *Collapse* and *The World Until Yesterday*. Originally trained in physiology, Diamond is known for drawing from a v...

en.wikipedia.org · Text under [CC-BY-SA license](#)

- [Wikipedia](#)
- **Born:** Sep 10, 1937 (age 78) · [Boston, MA](#)
- **Spouse:** [Marie Diamond](#)
- **Awards:** [Royal Society Prizes for Science Books](#) · [Pulitzer Prize for General Non-Fiction](#) (1998)
- [MacArthur Fellowship](#) (1985) · [Wolf Prize in Agriculture](#) (2013) · [Guggenheim Fellowship for Natural Sciences, US & Canada](#) (1998) · [National Medal of Science for Biologi...](#)
- **Education:** [Roxbury Latin School](#) · [Harvard University](#) · [Harvard College](#) · [Trinity College, Cambridge](#)
- **Parents:** [Louis Diamond](#) · [Flora Kaplan](#)

TED talks

	Why do societies collapse?	
	How societies can grow old better	

Timeline

1997: His second and best known popular science book, *Guns, Germs, and Steel: The Fates of Human Societies*, was published in 1997.

1998: Jared Diamond was awarded Pulitzer Prize for General Non-Fiction in 1998.

1998: Jared Diamond was awarded Guggenheim Fellowship for Natural Sciences, US & Canada in 1998.

2008: In 2008, Diamond published an article in The New Yorker entitled Vengeance Is Ours, describing the role of revenge in tribal warfare in Papua New Guinea.

2010: In 2010, Diamond co-edited (with James Robinson) Natural Experiments of History, a collection of seven case studies illustrating the multidisciplinary and comparative approach to the study of history that he advocates.

2012: Diamond's most recent book, The World Until Yesterday, published in 2012, asks what the western world can learn from traditional societies.

Humane Society, Audubon Society Views & Policies

From: Lori Lacell
Sent: Thursday, March 3, 2016 1:42 PM
To: mparadise59@yahoo.com
Subject: Rabbit questions

Tammy in our phone room gave your message to me. I have two house rabbits and am the staff person that fields rabbit questions. We intend all of our rabbits to be housed indoors because they are considered part of the family. Other shelters may have a different policy but ours indoors only.

It is safer inside a house than living outside, even if there is an outdoor hutch. Rabbits that have always lived indoors would be too stressed or frightened to live outdoors. Additionally there are a lot of health hazards to living outdoors-biting fleas and flies for example as well as predators, birds of prey loose dogs, cats, etc. The temperature extremes in summer and winter are also a concern.

There are a lot of house plants, trees, shrubs and flowers that are toxic to rabbits and that is another reason outdoors can more of a danger than a reward for rabbits. Even if you don't use pesticides in your yard you can't prevent wind drift from your neighbors' yards affecting your plants.

I personally never let my two house rabbits outside because the dangers outweigh the benefits. Rabbits can get all of their exercise and socializing with their people inside so being outside isn't necessary.

If you want an outdoor only rabbit, this is the time of year when there are lots of those available for sale at feed stores. These rabbits most likely were born outside or lived in a barn. Research safe, insulated housing because again, living outdoors is physically stressful on rabbits and it can affect how the bond and interact with people.

It is important that if you adopt a rabbit, make sure that it gets spayed or neutered. Reproductive cancers are common and drastically shorten the life span of a rabbit. In general rabbits live between 8 to 12 years or so depending on the breed. The House Rabbit Society is a great resource to learn about all things rabbits.

Thanks for your interest in house rabbits. If you are not experienced with rabbit ownership I strongly recommend you research rabbits in general and specific breeds to make sure that this is the kind of pet for you and your family.

Thanks a BUNch!

Lori Lacell

Customer Care Representative

[X]Doggie Dash on May 14th is the best place in the Northwest to have fun with your four-legged friends and help animals in need. <<https://mail.oregonhumane.org/owa/UrlBlockedError.aspx>> Register for Doggie Dash<<http://www.oregonhumane.org/doggiedash/index.asp>> today!

Animals entering shelters per year and human babies given up VS Captive Born Pet Skunks given up per year

<http://www.asPCA.org/animal-homelessness/shelter-intake-and-surrender/pet-statistics>

~Approximately 7.6 million companion animals enter animal shelters nationwide every year. Of those, approximately 3.9 million are dogs and 3.4 million are cats.

~Each year, approximately 2.7 million animals are euthanized (1.2 million dogs and 1.4 million cats).

~Approximately 2.7 million shelter animals are adopted each year (1.4 million dogs and 1.3 million cats).

~About 649,000 animals who enter shelters as strays are returned to their owners. Of those, 542,000 are dogs and only 100,000 are cats.

~Of the dogs entering shelters, approximately 35% are adopted, 31% are euthanized and 26% of dogs who came in as strays are returned to their owner.

~Of the cats entering shelters, approximately 37% are adopted, 41% are euthanized, and less than 5% of cats who came in as strays are returned to their owners.

~About twice as many animals enter shelters as strays compared to the number that are relinquished by their owners.



- Estimated number of brick-and-mortar animal shelters in the US: 3,500
 - Estimated number of rescue groups and animal sanctuaries in North America: 10,000
 - Number of cats and dogs entering shelters each year: 6-8 million (down from 13 million in 1973)
 - Of the 3 million cats and dogs euthanized in shelters each year, approximately 2.4 million (80%) are healthy and treatable and could have been adopted into new homes
 - Percentage of purebred dogs in shelters: 25%
 - Number cats and dogs adopted from shelters each year: 4 million
 - Percentage of cats euthanized in shelters: 70%
 - Percentage of total shelter intake comprised of cats: Approximately 50% (but in some regions 2/3 of shelter population is cats)
 - Estimated amount spent by humane organizations annually: \$2.5 billion (about \$8 per capita)
 - Estimated amount spent by animal control organizations annually: \$800 million to \$1 billion (about \$4 per capita)
- http://www.humanesociety.org/issues/pet_overpopulation/facts/pet_ownership_statistics.html



One and a Half Million Adopted Children in the United States

There are 1.5 million adopted children in the United States, over 2% of all U.S. children. <http://adoptionsbygladney.com/adoption/domestic/adoption-facts>

~Estimated Captive Bred pet skunks sold per year from ALL United States breeders is about 1000 (There are no skunk mills, like puppy mills)

~Breeders of captive born pet skunks are USDA and State licensed

~Federally licensed skunk rescue ONE maybe TWO

~Estimated Captive Born pet skunks given up each year, less than 1.5 % (5-15)

~ Most people keep their pet skunks~



Type size - +

Successfully bring your outdoor cat inside this winter



Happy house cat inside his catio basks in all the attention during the 2013 Catio Tour © Michael Sulis

by Nikkie West, Backyard Habitat Program Coordinator

Jan. 22, 2014: Have you considered transitioning your cat indoors but haven't been able to get started? According to the Humane Society, about two-thirds of cats live indoors either all or almost all of the time. As your veterinarian will support, these indoor felines enjoy freedom from a laundry list of perils — diseases, parasites, automobile traffic, poisoning, our healthy population of urban coyotes, and simply getting lost.

Of course, the decision to keep your cat inside or out is deeply personal. But perhaps you attended our Catio Tour this fall, or have been following recent reports detailing domestic cats' devastating impact on urban wildlife, and have been inspired to try giving your cat a new indoor lease on life. This New Year, consider a resolution that puts the birds first in your back yard.

Why now?

Because there's no better time than winter to get started! Our friends at the Feral Cat Coalition agree that bitter-cold winter temperatures and dreary rain present the perfect opportunity to begin the transition. Cats are naturally less interested in being outdoors. This provides an ideal window to make the transition before bird-nesting season begins in March. So, here's some inspiration and suggestions for making Fluffy or Goliath the happiest housecat on the block. We thank the Humane Society for many of these great ideas.

Start by creating your feline friend's indoor sanctuary

A luxurious indoor environment, particularly in the winter, may be all your cat needs to become a convert. While you make the transition to indoor living, introduce items such as:

- a cozy bed in a sunny location,
- a scratching post,
- something to climb and view of the indoor and outdoor world from above,
- areas for hiding (such as brown paper bags or cardboard boxes), and
- new toys for indoor enrichment.

Take your time

You'll have the most success by making the transition gradual until the new way of life becomes second nature. Be prepared for a little lashing out against the new lifestyle — scratching at doors, clawing at windows, yowling, trying various escape tactics, and other feline performances.

- Start with baby steps, like always feeding your cat indoors.
- After meals, instead of letting them out immediately, keep them inside for gradually longer periods each day.
- Keep cats indoors during dawn and dusk hours and gradually increase the amount of indoor time around dawn and dusk.
- For the feline escape artist that's forever bolting toward open doors, train or lure them away from the open door. Run practice trials where you leave the door ajar and squirt them with a water gun or rattle a jar of coins to startle them. Also try luring them the other way by tossing a treat in the opposite direction. The goal is not to punish the cat but to associate the door with something unpleasant.

Make indoor life fun!

Cats have been domesticated for thousands of years but they still have wild behaviors deeply encoded in their DNA. Have fun with this by providing varied enrichment that honors your cat's unique behavior. Ideas include:

- Toys that allow your cat to express instincts such as stalking, chasing, and pouncing. Even simple items like a bottle cap can provide endless entertainment.
- An indoor planter containing feline favorites such as catnip and wheat grass for them to chew on (available at pet supply stores).
- Train him to walk on a cat harness and leash and take him for a stroll.
- Give her lots of your time and attention — set aside play time each day.
- Consider building a "catio" — a fully-enclosed outdoor cat-patio — attached to the house where your cat can enjoy an outdoor experience.

Ultimately, do your best not to give in to their requests to go out, and distract them with play. As one out of every four common bird species faces serious population declines, help us keep common birds 'common' by decreasing the human-caused hazards they face. Even small steps toward keeping your cat indoors can make a positive impact. For additional support and tips, see the Humane Society website.

Cats Safe at Home™ is a collaborative effort of Portland Audubon, Feral Cat Coalition of Oregon, Bonnie L. Hays Small Animal Shelter, and Multnomah County Animal Services. Learn more about Cats Safe at Home™.

Type size - +

Animal Abandonment

Oregon Administrative Rule 167.340

A person commits the crime of animal abandonment if the person intentionally, knowingly or recklessly or with criminal negligence leaves a domesticated animal at a location without providing for that animal's continued care. (Animal abandonment is a Class C Misdemeanor punishable by up to \$1,000 fine and/or 30 days in jail.)

Many of the animals commonly seen roaming the urban landscape do not belong there. Some, such as Rock Doves (city pigeons), European Starlings, House Sparrows, nutria, opossum, Fox Squirrels and Eastern Gray Squirrels, are wildlife from other places that have been introduced and become established in Oregon.

Others, such as feral cats and dogs, domestic ducks and geese, peacocks, Red-eared Sliders, snapping turtles, box turtles, chickens, prairie dogs and hedgehogs, are domestic animals that have either escaped from captivity or have been deliberately abandoned.

While most people recognize that it is wrong to release their dogs and cats into the wild, it often comes as a surprise when they learn that it is equally problematic and illegal to release other pets. In fact, many people still deliberately and unwittingly raise animals with the intention of ultimately setting them free.

Although the Wildlife Care Center accepts only native wildlife, each year we are brought hundreds of domestic animals found roaming the urban landscape. Even more often, we receive calls from people looking for "appropriate" locations to release their pets. All too frequently these calls come from schools that have raised domestic animals as a class project and want to get rid of them once summer arrives.

Not only is the dumping of domestic animals illegal, it is also ecologically destructive and inhumane. Many of these animals are ill-equipped for life in the wild. Many of the large domestic ducks and geese left in our urban parks, for example, are flightless and unable to escape predators or withstand the rough and tumble world of breeding season. Those animals that are able to survive often displace native wildlife, destroy valuable habitat, and have the potential to introduce diseases and parasites.

Non-native turtles such as Red-eared Sliders, box turtles and snapping turtles have played a large role in the decline of our two native turtle species, the Western Pond and Western Painted. Today both of our native species are listed as "sensitive."

Extensive dumping of domestic ducks and geese into our urban parks has reduced water quality and led to problems associated with overpopulation that affects both natives and non-natives alike.

Even our own Audubon Society of Portland Nature Sanctuary is frequently visited by families toting no-longer-wanted family pets. Our sanctuary pond is home to a variety of introduced turtles and fish, alas at the direct expense of those creatures for which this sanctuary was created.

The reality for these unwanted pets is an ugly one. Many die miserable deaths in the wild. For some species there are rescue groups, but for many there are not. Many arrive at our doors too debilitated or injured to be restored to health. For others, especially trendy "flash in the pan" pets such as prairie dogs, there are no homes available and they are ultimately destroyed. This is not a reflection of lack of community concern, but rather a direct result of irresponsible pet ownership.

The State of Oregon has developed Wildlife Integrity Rules that ban the importation or sale of exotic species that could pose a threat to native wildlife or their habitats. Many animals known to be harmful, but which were previously sold in Oregon pet stores, are now prohibited. Nonetheless, responsible pet ownership, especially in the urban environment where wildlife habitat is increasingly at a premium, is essential to preserve and protect our native wildlife.

What you can do:

- Remember that the acquisition of any domestic pet is a lifetime commitment. If you no longer want your pet, you should either find it a new owner or take it to an appropriate adoption facility.
- Discourage your children's school from raising animals in the classroom unless an appropriate permanent home can be identified beforehand.
- Keep domestic animals under control.
- Before purchasing any exotic pet, check with your local fish and wildlife agency to ensure that this species is allowed to be sold in Oregon.
- Inform anyone you see releasing a pet into the wild that this activity is illegal.

Type size - +

Non-native Animal Policy

The Audubon Society of Portland's Wildlife Care Center does not accept non-native, exotic or domestic animals for treatment.

Many of the animals found roaming free in Oregon do not belong here. Some wildlife, such as Rock Doves (city pigeons), Starlings, House Sparrows, nutria, opossums, Fox Squirrels and Eastern Grey Squirrels have been introduced from other places and become established in Oregon.

Others such as feral cats and dogs, domestic ducks and geese, Red-eared Sliders, and peacocks are domesticated animals that have either escaped or been abandoned. In all cases, these animals do not belong in the wild.

The Wildlife Care Center does not accept non-native, exotic, or domestic animals for the following reasons:

1. Introduced species compete with and reduce the numbers of native wildlife, are ecologically harmful, and can carry diseases contagious to native species. While it may not be immediately apparent, the decision to return an introduced species to the wild is oftentimes a decision to destroy the native wildlife that already inhabits that area. For example, the introduction of nutria (a large South American rodent) to a wetland can make an entire wetland uninhabitable for other bank-dwelling wildlife (otters, muskrats, beavers, etc.). Starlings and House Sparrows are fierce competitors with many native species including Western Bluebirds, wrens and swallows.
2. The Wildlife Care Center has limited resources. Each year, we take in nearly 3,500 injured and orphaned wild animals. Our facility is set up for one purpose only: to treat injured and orphaned native wildlife for return to the wild. Caring for non-native, exotic and domestic animals directly reduces our ability to accomplish this mission.

Please realize that this is not an isolated or infrequent problem. During 1998, the Wildlife Care Center was brought more than 700 non-native, exotic and domestic animals that were found free-roaming in the wild. These animals represented 32 different species. The list included everything from common non-natives species such as Rock Doves, Starlings and House Sparrows to more surprising animals such as a Nile Monitor Lizard, a Fennec Fox (native to Africa), Prairie Dogs, European Hedgehogs, parrots and European Ferrets.

What You Can Do

- If you find an injured or orphaned non-native, invasive species, it is against Oregon law for you to care for it yourself or to have a veterinarian treat it. You should contact the Wildlife Care Center for further advice.
- If you find an abandoned or escaped domesticated animal, please contact an appropriate agency such as the Oregon Humane Society or Multnomah County Animal Control. These agencies do NOT take in non-native wildlife species such as Starlings, House Sparrows, Rock Dove, opossums, nutria, Fox Squirrels and Eastern Grey Squirrels.
- If you have a domesticated animal that you no longer want, please either find it a new permanent home or take it to an appropriate agency such as Oregon Humane Society or Multnomah County Animal Control. It is inhumane to release a domesticated animal into the wild in Oregon. It is also a Class C misdemeanor punishable by up to 30 days in prison and fines not to exceed \$1,000 to deliberately abandon a domesticated animal.

Nutria

The nutria, or "coypu," was brought to the United States from South America to be bred on fur farms. This species subsequently escaped to the wild and established itself across the United States. Nutria are sometimes confused with native muskrats and beaver. An adult nutria is significantly larger than a muskrat and unlike the beaver has a thin, hairless, rat-like tail.

Chukar/Button Quail/Bobwhite Quail/Peacocks

These are all domestic quail that are raised in captivity and occasionally escape or are released to the wild. Identification is best done via a good bird guide.

Opossum

The opossum is native to the United States east of the Rocky Mountains. It has become established along the West Coast and negatively impacts native bird species by raiding nests and consuming eggs.

Fox Squirrels

Fox Squirrels were brought to Oregon from the eastern United States and have established themselves in urban and suburban habitat throughout the state. They are the most common tree squirrels found in Portland. Fox Squirrels are reddish brown in color with large bushy tails and tan undersides. Fox Squirrels are notorious for breeding "out of season," and infant and very young squirrels found after October 1 and earlier than April 1 are members of this species.

Eastern Gray Squirrels

This small gray squirrel with a white belly was introduced to Oregon from the eastern United States. It is rapidly expanding its range and is just now becoming established in Portland. It is similar in color but significantly smaller than the native Western Gray Squirrel. Eastern Gray Squirrels have breeding schedules similar to the Fox Squirrel.

Box Turtles/Red-Eared Sliders/Snapping Turtles

Oregon has only two native turtles, the Western Pond and Western Painted. The pet industry has imported a number of non-native turtle species to Oregon that have subsequently become established in the wild. These turtles transmit disease and compete directly with native turtles and other wildlife.

Agency Phone Numbers

Audubon Society of Portland Wildlife Care Center: 503-292-0304

Oregon Humane Society: 503-285-0641

Multnomah County Animal Control: 503-988-7387

Non-native Animals Commonly Brought to the Wildlife Care Center

Domestic Ducks

Many of the ducks inhabiting urban parks are domestic ducks that have escaped or been deliberately released from captivity. Many of these birds then successfully breed in the wild. They include the domestic Mallard (usually much larger than the native wild Mallard), the Muscovy Duck, Indian Runner Ducks, and a variety of mixed breeds. The presence of these mostly flightless, non-migratory ducks in urban wetlands and parks causes overcrowding and reduces the already scant urban habitat available to native waterfowl.

Domestic Geese

Many of the geese inhabiting urban parks are domestic geese that have escaped or been deliberately released from captivity. Many of these birds then successfully breed in the wild. They include the Chinese Goose, the Graylag Goose, Toulouse Goose, and the "White" Goose. The presence of these mostly flightless, non-migratory geese in urban wetlands and parks causes overcrowding and reduces the already scant urban habitat available to native waterfowl.

Starlings

Introduced to the United States from Europe, the starling aggressively competes with native bird species for nesting cavities. It is now the most common bird in the United States. Starlings come in a variety of very different plumages. Breeding starlings are iridescent black with yellow bills. In the fall, adult plumage appears more brown. Juvenile plumage appears a gray to brown. Nestlings are easily identified by their huge yellow "clown lips."

House Sparrows

Introduced to the United States from Europe, House Sparrows are notorious for aggressively competing with native bird species for nesting cavities. Differentiation from other native species of sparrow and finch is best done via a good bird identification guide.

City Pigeons/Rock Pigeons

The common city pigeon or Rock Pigeon was introduced to the United States from Europe. It is easy to distinguish from our native Band-tailed Pigeon. Band-tails have yellow legs while the introduced Rock Dove has red legs.

**Caging:
Wrong Species,
Wrong Cage**

Taxonomy

Historically, skunks have been classified as a subfamily in the weasel family, the Mustelidae. Recent genetic data have allowed them to be reclassified into their own family. Additionally, stink badgers have been included in the badger subfamily of the weasel family. Morphometric and genetic data have been used to demonstrate that they should be classified with the skunks. The family Mephitidae is derived from the genus *Mephitis*, which is Latin for "bad odor". Within the family there has been some debate as to the number of genera and species. The two species of stink badgers were thought to be distinct genera, but here are referred to as a single genus. The eastern and western spotted skunks have been classified as a single species, but genetic and reproductive data warrant recognition of two species. Chromosomal data suggest that at least one more species is found in Central America. The western and Gulf Coast hog-nosed skunks are here recognized as a single species, based on genetic and morphological data.

The four genera in the Mephitidae are: *Mephitis*, including the striped skunk, *Mephitis mephitis*, and the hooded skunk *M. macroura*; *Spilogale* consisting of at least 4 species, *S. angustifrons*, the southern spotted skunk, *S. putorius*, the eastern spotted skunk, *S. gracilis*, the western spotted skunk, and *S. pygmaea*, the pygmy spotted skunk; *Conepatus*, containing *C. leuconotus*, the white-backed hog-nosed skunk, *C. semistriatus*, the striped hog-nosed skunk, and *C. chinga*, the South American (or Molina's) hog-nosed skunk; and finally, the only non-American genus, *Mydaus*, the stink badgers, *M. javanensis*, the Sunda stink badger, and *M. marchei*, the Philippine stink badger.

AZA
Accreditation
What's the
Chance? ZERO

AZA Accreditation for domesticated pet skunks is wrong

I am in total disbelief that owners of domestic "captive born skunks" should be forced to seek AZA Accreditation. The ODFW Division 44 Draft rules state that "a person or facility adding to their collection of these species (larger mammals, furbearers, pet skunks) or any new facility wanting a permit would need to be accredited by the AZA before obtaining a holding permit for these species".

ODFW claims the reasons for these rules involves disease, such as rabies and distemper, and human safety issues. All mammals, including humans can get or carry the rabies virus. The Center for Disease Control has no record of human deaths from rabid wild or domestic pet skunks for more than 65 years. ODFW is focusing on an issue that has been non-existent amongst all skunks for many years. Moreover, a "domestic" pet skunk housed indoors, would pose no threat, at all. After extensive research, I was unable to find any record of a "captive born" domestic skunk living in a home environment, having rabies. Research by the CDC shows that dogs, and house cats that have not received their shots pose a much greater risk. Perhaps the focus should be on getting more responsible pet owners to get the appropriate shots for their cats and dogs. If ODFW is really concerned about rabies amongst "domestic" skunks, they would do the opposite of what they are proposing, and require that our skunks be housed in a safe indoor environment, and mandate that all other indoor pets, such as cats or dogs that our pet skunks are exposed to receive rabies and distemper shots. This would mean that pet skunk owners would need to furnish ODFW with proof that their other animals that the skunk is exposed to have received their rabies and distemper shots.

Page 19, of the 2016 Accreditation Inspectors Handbook, states that for the purposes of the AZA's accreditation program, a zoological park or aquarium is defined as: "A permanent (indefinitely continuing) institution which owns and maintains *wildlife* (non-domesticated animals), under the direction of a professional staff, provides its animals with appropriate care, and exhibits them in an aesthetic manner to the public on a regular basis. The institute, division, or section shall further be defined as having as their primary mission the exhibition, conservation, and preservation of the earth fauna in an educational and scientific manner".

It is abundantly clear, that the reason why ODFW has chosen to place pet skunk owners under the jurisdiction of AZA is because they want to eliminate all prospects of any current skunk owner ever having another pet skunk again in the future. AZA proudly proclaims that fewer than 10% of the animal exhibitors meet the licensing requirements to be accredited. These larger institutions, such as zoos and aquariums have considerable resources to provide adequate staff and research, not to mention facilities that cost millions of dollars. How many of you proposing the AZA criteria, could meet the given requirements that you are asking for us to meet? If you can't meet them with all of your resources, then how do you expect that we do the same?

Furthermore, a skunk is an indigenous species to North America and is in abundance, and not endangered, with no need for conservation measures. ODFW cares nothing about the conservation of the skunk species. Rather, ODFW has recently dictated that trapped skunks be killed, rather than be taken to wildlife rehabilitation facilities. Moreover, ODFW wants for our house pets that have been raised indoors to be forced to live isolated outdoors in a cage, which will constitute inhumane treatment of our beloved pets, and cause an early demise. It would also allow for vector borne diseases to be widespread amongst our skunks caged outside, whereas it would be virtually non-existent if our skunks were allowed to continue to live indoors, as they always have. Our pet skunks will virtually become a

"bait" for all sorts of diseases, including rabies and distemper. Our skunks would also be exposed to predators and unauthorized individuals. Once again, if ODFW wanted to lessen these diseases, they would mandate the complete opposite, which is to house our pet skunks in a safe home environment, rather than an outside unsafe cage environment, which would be a detriment to the physical, mental, and social well-being of our domestic skunk.

In reading just a portion of the information obtained from the AZA via the internet, as a domestic skunk owner, I am expected to abide by the following criteria:

- Maintained strollers, wheelchairs for public
- Provide a mission statement
- Photos showing my institution on a typical day of operation
- Animal inventory in taxonomic order
- Provide plan on responsible population management
- Provide food analysis report
- Protocol exposure times, animal handling in touch pool or petting environment
- Institutions vet program
- Written euthanasia policy
- Conversation action plan
- Educational activities, including multi-cultural, special needs, conservation
- Formal committee to review research
- Furnish copy institutional constitution, charter and bylaws
- Volunteer program
- Details support organization
- Written financial contingency plan
- Capital improvements
- Info on holding facilities, laboratory,
- Animal hospital, quarantine facilities
- Emergency life support system
- Zoonotic training
- Written procedure, training handling
- Hazardous materials
- Perimeter fence
- Guest services, gift shop
- Master plan, strategic plan
- Prove record continued growth
- *Proper ratio males to females maintained*
- *Animals protected from weather and adverse Conditions*
- *Shelter to protect from heat, cold, rain*
- Provide USDA exhibitor license #
- Provide Institutional Collection Plan
- Institutional Collection Plan
- CITES I, SSP, ISIS, ARKS, ZIMS registration
- Training in AZA record keeping
- Description animal training program
- Hand washing stations, signage, first aid stations
- Ambassador animal policy
- Animal enrichment and training program
- Protocol for animal restraint and capture
- Browse diet and enrichment program
- Involvement in SSP, TAGS, SAGS, CAPS, FCCS
- Provide appropriate library, internet
- Research related policies
- Animal care and use committee
- Details of governing bodies
- Provide info full and part time staff
- Copy audited financial statement
- Furnish annual operating budget
- Proof liability insurance
- Maintenance program
- Information on isolation facilities, surgery rooms, necropsy room
- Risk management, safety audit plan
- Safety data sheets
- Live action emergency drill reports
- Fire drill training
- In house safety committee
- Handicapped accessible bathrooms water fountains, benches, maps, brochures
- *Enclosure must meet physical, psychological, and social needs*
- Meet sociobiological needs
- Adequate pest control program
- Adequate vet response time

- Timing and location of food should be biologically stimulating
- Panic hardware for exits
- Provide access to animal care manuals specific to the animals in my institution (It should be noted that amongst the animal care manuals, both completed and in progress by the AZA, that there is no manual written about the proper care of skunks. How then, can the AZA "experts" in skunk care dictate to us how to best care for our skunks when they are not adequately trained in caring for the domestic skunk).
- CEO, director available full time
- Plumbing, heating, lighting adequate
- Sidewalks, roads good repair

It should be noted that as a responsible pet skunk owner, I exceed any requirements necessary for the health and welfare of my skunk, which includes physical, social, and emotional needs. This also includes a proper diet, and enrichment, and play activities. I provide a warm and safe loving home environment, safe from predators and disease. For the safety of my skunk, I do not wish to expose her to unknown members of the public.

These are just a few of the expectations set forth by the AZA. The outside cage requirements set forth by the ODFW, would make the following categories required by AZA impossible to attain:

1. Proper ratio males to females (ODFW limits us to two skunks)
2. Animals protected from heat, cold, rain
(ODFW requires outdoor cage, designed for different species)
3. Shelter must meet physical, psychological, and social needs
(ODFW caging requirements will have devastating effects on the physical, psychological, and social needs)
4. Adequate pest control system (skunks cannot safely be exposed to pesticides)

Moreover, I do not meet any of the basic criteria needed to receive AZA accreditation. Some of this criteria is as follows:

1. My skunk is domesticated, and not wild and therefore not eligible
2. I do not need to employ any full time staff to care for my one skunk. I can do a great job by myself.
3. I do not wish to pursue scientific studies, or research related to my pet skunk
4. I do not wish to have my home or grounds open to the public, nor pursue educational or multicultural related venues
5. I cannot have my skunk engage in breeding activities, as the ODFW guidelines require that she be fixed, and I am limited by the ODFW guidelines to have no more than 2 skunks. The AZA guidelines in the handbook state that my skunk must be managed for long term viability of the species, i.e. ex-situ breeding.

As can clearly be seen from the aforementioned information, it will be impossible for any skunk owner to meet the AZA standards, which are in direct opposition to many of the ODFW requirements. Furthermore, none of these criteria serve to better the lives of our pet skunks in any manner whatsoever.

The AZA criteria, will create a lot of unnecessary paperwork, and an incredible monetary expense for the skunk owner. In addition, it will create an enormous amount of wasted time, all of which is unnecessary, in the first place. It will also create a lot of unnecessary paperwork, travel, and additional supervisory staff for AZA, in order to administer these rules. Travel and lodging expenses for a minimum of two inspectors, for 1 ½ days will be required. As a tax payer, I resent being forced to pay for such unnecessary and wasteful practices that I consider inhumane to my pet skunk, and frankly constitute an over extension of power, that I consider abusive towards me and other rightful pet skunk owners, and in violation of my rights as a responsible and loving domestic pet skunk owner.

As a concerned citizen, and pet skunk owner, I would like to obtain statistics as to how many owners of one domesticated skunk, have been able to meet the AZA certification guidelines? How many individuals have applied for certification? What is the breakdown of how many individuals have received certification on their first try vs. those who have been turned down? What is the precedence for this requirement? What other household pets are required to meet these AZA requirements? What is the success rate for those animals meeting AZA standards for one pet?

I hear by ask that the AZA clause be removed from the Division 41 – rule changes, as it is in direct opposition to common sense, is totally unnecessary, and is mean spirited in its intent to prevent any future skunk owners in the state of Oregon. I ask that I be able to retain the right to own a pet skunk, and to be able to continue to raise my skunk, as well as future skunks, in a loving and nurturing environment in my home, without uncalled for intervention or harassment by ODFW, AZA, or any other agency related in intent or purpose. A simple and more cost efficient solution for all pet skunk owners and the agencies involved would be to continue to allow our pet skunks to live in their home environment as they have grown accustomed, and to continue to allow us that right as responsible pet owners.

Respectfully,

Melinda Hodge

Marilyn Van Dyke

**Rabies:
Setting the
Record Straight
CDC-Humane Society**

September 26, 2013

Understanding Rabies

Facts and safety guidelines clear up misperceptions

The Humane Society of the United States

Thanks to widespread pet vaccinations, effective post-exposure treatment, and the relative rarity of undetected bites by rabid animals, the number of human deaths in the United States caused by rabies has declined to an average of only one or two per year--far less than the number of human fatalities caused by lightning strikes and bad hamburgers. This doesn't mean you shouldn't take precautions to protect yourself, your family, and your pets. The best ways to guard against rabies:

- Don't approach or handle wild animals, especially sick wild animals
- Vaccinate your pets
- Get prompt post-exposure treatment when advised to do so by a doctor or health department

What is rabies?

Signs of rabies in animals

Key facts

Which species carry rabies?

People and rabies

Precautions

What is rabies?

Rabies (Lyssavirus) is an infectious disease that affects the central nervous system in mammals. It's transmitted through the saliva a few days before death when the animal "sheds" the virus. Rabies is not transmitted through the blood, urine, or feces of an infected animal, nor is it spread airborne through the open environment. Because it affects the nervous system, most rabid animals behave abnormally.

Signs of rabies in animals

In the "furious" form, wild animals may appear to be agitated, bite or snap at imaginary and real objects, and drool excessively. In the "dumb" form, wild animals may appear tame and seem to have no fear of humans.

There are other signs, such as the animal appearing excessively drunk or wobbly, circling, seeming partially paralyzed, acting disorientated, or mutilating itself. However, most of these signs can also be indicative of other diseases like distemper or lead poisoning. There are few behavioral signs that are telltale of rabies alone.

If a typically nocturnal animal, such as a raccoon or skunk, is active during the day and exhibiting abnormal behavior, you should seek advice from your local animal control, humane society, wildlife rehabilitator, or state wildlife agency.

Key facts

- Rabies travels from the brain to the salivary glands during the final stage of the disease—this is when an animal can spread the disease, most commonly through a bite.
- Rabies can't go through unbroken skin. People can get rabies only via a bite from a rabid animal or possibly through scratches, abrasions, open wounds, or mucous membranes in contact with saliva or brain tissue from a rabid animal.
- The rabies virus is short-lived when exposed to open air—it can only survive in saliva and dies when the animal's saliva dries up.
- If you handle a pet who has been in a fight with a potentially rabid animal, take precautions such as wearing gloves to keep any still-fresh saliva from getting into an open wound.

Which species carry rabies?

Any warm-blooded mammal can carry or contract rabies, but the primary carriers in North America are raccoons, skunks, bats, foxes, and coyotes. Thanks to an increase in pet vaccinations, wildlife now account for more than 90 percent of all reported rabies cases.

Rabies tends to be more common in different species in different places, but is certainly not limited to these trends:

- Raccoons suffer the most from this disease in the eastern U.S.
- Skunks are the dominant rabies victims in the north- and south-central states, although skunk rabies also occurs in the East.
- Bats suffering from rabies are not limited to any particular area but scattered widely.
- Foxes in western Alaska, parts of Arizona and Texas, and the eastern United States are victims more frequently than foxes in other areas.
- Coyotes with rabies have been found in southern Texas in the past but rarely in recent years.
- Rodents (squirrels, chipmunks, rats, mice, hamsters, gerbils, and guinea pigs), rabbits, and hares rarely get rabies and have not been known to cause rabies among humans in the United States. Squirrels may suffer from the fatal roundworm brain parasite, which causes signs that look exactly like rabies.
- Opossums are amazingly resistant to rabies. Hissing, drooling, and swaying are part of the opossum's bluff routine. It is intended to scare away potential predators, yet it looks just like rabies and is the reason people can be convinced they're seeing "rabid opossums" when they're not.

Federal and state wildlife officials have been vaccinating wildlife in many regions over the past 15 years. They distribute vaccine-laden baits that the target animals eat and thereby vaccinate themselves. Right now, oral rabies vaccination of wildlife focuses on halting the spread of specific

types of rabies in targeted carrier species. Next, it's hoped that this tool can shrink the disease's range.

People and rabies

Given all the media attention that rabies regularly receives, it may be somewhat surprising to learn that very few people die from rabies nationwide each year. Over the past 10 years, rabies has killed only a total of 28 people in the U. S. This amounts to fewer than 3 fatalities a year nationwide.

People who contracted rabies in the United States were mostly infected by a bat. Most didn't even know they were bitten. Some may have been sleeping when bitten. Others handled a bat bare-handed without realizing they'd been potentially exposed to rabies. But don't panic over every bat sighting. Less than one-half of one percent of all bats in North America carries rabies.

Although raccoons suffer from rabies more than any other mammal in the United States (about 35 percent of all animal rabies cases), only one human death from the raccoon strain of rabies has been recorded in the United States.

Precautions

Despite the long odds of contracting rabies, the remote possibility of infection exists and should not be taken lightly:

- Don't approach or handle wild animals.
- Vaccinate your pets—cats and dogs both—and any free-roaming cats under your care.
- If you see a wild animal who may be sick, contact your local animal control, veterinarian, or wildlife rehabilitator for help. Don't handle sick wildlife!
- If anyone is bitten by any wild animal, get medical advice from a doctor or health department immediately.
- If your pet is bitten by any wild animal, get medical advice from your veterinarian immediately.
- Scrub any bite wound immediately and aggressively with soap and water, use antiseptic soap such as betadine or Nolvasan®, if available. Flush the wound thoroughly with water.
- If anyone is bitten by a potentially rabid animal, scrub and flush the wound then go to your doctor or an emergency room.
- If possible, the animal should be captured and tested for rabies. Unless you can do it without risking further bites, leave this task to animal control professionals.
- If you find a bat in a room where someone was sleeping or where children might have had contact with him, the National Centers for Disease Control and Prevention (CDC) recommends that you assume the bat has bitten the sleeper or children and take the step for a known bite. CDC suspects that adults may overlook and children may underreport the bites of tiny bat teeth.
- Timely treatment after a bite or other exposure is 100 percent effective. The very few people who die from rabies are those who don't get timely treatment.

World Rabies Day

Since its launch in 2007, World Rabies Day has helped educate about 182 million people and vaccinated 7.7 million dogs through events in 150 countries. Globally, World Rabies Day is important because most deaths from rabies occur in countries with inadequate public health resources and limited access to preventive treatment. Since 1982, the World Health Organization has recommended vaccination--rather than removal--of free-roaming dogs to control rabies.



Human Rabies

- [Wild animal surveillance \(/rabies/location/usa/surveillance/wild_animals.html\)](/rabies/location/usa/surveillance/wild_animals.html)
- [Domestic animal surveillance \(/rabies/location/usa/surveillance/domestic_animals.html\)](/rabies/location/usa/surveillance/domestic_animals.html)
- Human rabies surveillance

Human rabies cases in the United States are rare, with only 1 to 3 cases reported annually. Thirty-four cases of human rabies have been diagnosed in the United States since 2003, in which 10 cases were found to have contracted infection outside of the United States and its territories. The number of human deaths in the United States attributed to rabies has been steadily declining since the 1970's due to animal control and vaccination programs, modern rabies biologics following exposure, and successful outreach campaigns. Rabies vaccination programs have eliminated domestic dogs as reservoirs of rabies in the United States, although we still see 80 – 100 dogs and >300 cats with rabies each year, usually infected by wildlife when these domesticated pets are not vaccinated against rabies. While the biggest rabies threat in the world (domestic dogs) has been controlled in the United States, interactions with other rabies reservoir species results in 30,000 – 60,000 Americans being vaccinated against rabies each year.

The case histories (if published) of the ten most recent cases can be found using the links below:

- [California - 2011 \(http://www.cdc.gov/mmwr/preview/mmwrhtml/mm6104a1.htm\)](http://www.cdc.gov/mmwr/preview/mmwrhtml/mm6104a1.htm)
- [New Jersey - 2011 \(/mmwr/preview/mmwrhtml/mm6051a2.htm\)](/mmwr/preview/mmwrhtml/mm6051a2.htm)
- [New York - 2011 \(http://www.cdc.gov/mmwr/preview/mmwrhtml/mm6117a2.htm\)](http://www.cdc.gov/mmwr/preview/mmwrhtml/mm6117a2.htm)
- [Louisiana - 2010 \(/mmwr/preview/mmwrhtml/mm6031a2.htm\)](/mmwr/preview/mmwrhtml/mm6031a2.htm)
- [Wisconsin - 2010 \(/mmwr/preview/mmwrhtml/mm6034a3.htm\)](/mmwr/preview/mmwrhtml/mm6034a3.htm)
- [Texas - 2009 \(/mmwr/preview/mmwrhtml/mm5907a1.htm\)](/mmwr/preview/mmwrhtml/mm5907a1.htm)
- [Indiana - 2009 \(/mmwr/preview/mmwrhtml/mm5913a3.htm\)](/mmwr/preview/mmwrhtml/mm5913a3.htm)
- [Virginia - 2009 \(/mmwr/preview/mmwrhtml/mm5938a3.htm\)](/mmwr/preview/mmwrhtml/mm5938a3.htm)
- [Michigan - 2009 \(/mmwr/preview/mmwrhtml/mm6014a1.htm\)](/mmwr/preview/mmwrhtml/mm6014a1.htm)

Cases of Rabies in Humans in the United States and Puerto Rico, 2003 Through July 2014, by Circumstances of Exposure and Rabies Virus Variant.

Date of Onset	Date of Death	Reporting State	Age	Sex	Exposure History*	Rabies virus variant†
2/10/2003	3/10/2003	VA	25	M	Unknown	Raccoon, eastern US
5/28/2003	6/5/2003	PR	64	M	Bite-Puerto Rico	Dog/mongoose, Puerto Rico
8/23/2003	9/14/2003	CA	66	M	Bite	Bat, Ln

2/9/2004	2/15/2004	FL	41	M	Bite-Haiti	Dog, Haiti
4/27/2004	5/3/2004	AR	20	M	Bite (organ donor)	Bat, Tb
5/25/200	5/31/2004	OK	53	M	Liver transplant	Bat, Tb
5/29/2004	6/9/2004	TX	50	F	Kidney transplant	Bat, Tb
6/2/2004	6/10/2004	TX	55	F	Arterial transplant	Bat, Tb
5/27/2004	6/21/2004	TX	18	M	Kidney transplant	Bat, Tb
10/12/2004	Survived	WI	15	F	Bite	Bat, unknown
10/19/2004	10/26/2004	CA	22	M	Unknown-El Salvador	Dog, El Salvador
9/27/2005	9/27/2005	MS	10	M	Contact	Bat, unknown
5/4/2006	5/12/2006	TX	16	M	Contact	Bat, Tb
9/30/2006	11/2/2006	IN	10	F	Bite	Bat, Ln
11/15/2006	12/14/2006	CA	11	M	Bite-Philippines	Dog, Philippines
9/19/2007	10/20/2007	MN	46	M	Bite	Bat, unknown
3/16/2008	3/18/2008	CA	16	M	Bite-Mexico	Fox, Tb-related
11/19/2008	11/30/2008	MO	55	M	Bite	Bat, Ln
2/25/2009	Survived	TX	17	F	Contact	Bat, unknown
10/5/2009	10/20/2009	IN	43	M	Unknown	Bat, Ps
10/23/2009	11/20/2009	VA	42	M	Contact-India	Dog, India
10/20/2009	11/11/2009	MI	55	M	Contact	Bat, Ln
8/2/2010	8/21/2010	LA	19	M	Bite-Mexico	Bat, Dr
12/24/2010	1/10/2011	WI	70	M	Unknown	Bat, Ps
4/30/2011	Survived	CA	8	F	Unknown	Unknown
6/30/2011	7/20/2011	NJ	73	F	Bite-Haiti	Dog, Haiti
8/14/2011	8/21/2011	NY	25	M	Contact-Afghanistan	Dog, Afghanistan
9/1/2011	8/21/2011	NC	20	M	Unknown	Raccoon, eastern US
9/1/2011	10/14/2011	MA	40	M	Contact-Brazil	Dog, Brazil
12/3/2011	12/19/2011	SC	46	F	Unknown	Tb
12/22/2011	1/23/2012	MA	63	M	Contact	My Sp
7/31/2012	7/6/2012	CA	34	M	Bite	Bat, Tb
5/16/2013	6/11/2013	TX	28	M	Unknown-Guatemala	Dog, Guatemala

*Data for exposure history are reported based on when plausible information was reported directly by the patient (if lucid or credible), or when a reliable account of an incident consistent with rabies virus exposure (e.g. dog bite) was reported by an independent witness (usually a family member). Exposure histories are categorized as: Bite, contact (e.g. awaking to find bat

on exposed skin, etc), but no known bite was acknowledged, or unknown (i.e. no known contact with an animal was elicited during case investigation)

†Variants of the rabies virus associated with terrestrial animals in the United States and Puerto Rico are identified with the names of the reservoir animal (e.g. dog or raccoon), followed by the name of the most definitive geographic entity (usually the country) from which the variant has been identified. Variants of the rabies virus associated with bats are identified with the names of the species of bats in which they have been found to be circulating. Because information regarding the location of the exposure and the identity of the exposing animal is almost always retrospective and much information is frequently unavailable, the location of the exposure and the identity of the animal responsible for the infection are often limited to deduction. *Dr* = *Desmodus rotundus*, *Ln* = *Lasionycteris noctivagans*, *My Sp* = *Myotis species*, *Ps* = *Perimyotis subflavus*, *Tb* = *Tadarida brasiliensis*

Annual Surveillance Reports in the United States

2013 [PDF - 756KB] (<http://avmajournals.avma.org/doi/pdf/10.2460/javma.245.10.1111>) 
(<http://www.cdc.gov/Other/disclaimer.html>)

2010 (<http://avmajournals.avma.org/doi/pdf/10.2460/javma.239.6.773>) 
(<http://www.cdc.gov/Other/disclaimer.html>)  [PDF - 1 MB]

2009 (<http://avmajournals.avma.org/doi/pdf/10.2460/javma.237.6.646>) 
(<http://www.cdc.gov/Other/disclaimer.html>)  [PDF - 1.33 MB]

2008 (<http://avmajournals.avma.org/doi/pdf/10.2460/javma.235.6.676>) 
(<http://www.cdc.gov/Other/disclaimer.html>)  [PDF - 1.45 MB]

2007  [PDF - 1.10 MB] (http://www.cdc.gov/rabies/pdf/surveillance_us_2007.pdf) JAVMA 233(6):884-897 (2008). Available with permission.

2006 (<http://avmajournals.avma.org/doi/pdf/10.2460/javma.231.4.540>) 
(<http://www.cdc.gov/Other/disclaimer.html>)  [PDF - 1.38 MB]

2005 (<http://avmajournals.avma.org/doi/pdf/10.2460/javma.229.12.1897>) 
(<http://www.cdc.gov/Other/disclaimer.html>)  [PDF - 1.29 MB]

Page last reviewed: September 21, 2015

Page last updated: September 21, 2015

Content source: [Centers for Disease Control and Prevention](#)

[National Center for Emerging and Zoonotic Infectious Diseases \(NCEZID\)](#)

[Division of High-Consequence Pathogens and Pathology \(DHCPP\)](#)

Centers for Disease Control and Prevention 1600 Clifton Rd. Atlanta, GA
30329-4027, USA
800-CDC-INFO (800-232-4636) TTY: (888) 232-6348 - [Contact CDC-INFO](#)





Information for Doctors



Patient history, duration and progression of illness, and laboratory tests for other common etiologies of encephalitis will help determine if rabies should be on the differential diagnosis list for a patient. Patient history is important to identify a possible exposure to rabies and other encephalitides; however, rabies should never be ruled out based solely on the absence of definite exposure history.

Rabies should be considered in patients with signs or symptoms of encephalitis or myelitis, including autonomic instability, dysphagia, hydrophobia, paresis, and paresthesia, particularly if a nonspecific prodrome preceded the onset of these signs by three to four days. Progressive worsening of neurologic signs is characteristic of rabies and should be considered as a positive indicator for rabies.

Laboratory tests to rule out common encephalitides (herpes, enteroviruses, arboviruses) should be performed. Negative results of these tests would increase the likelihood of rabies as the diagnosis. If a patient presents with symptoms similar to the ones described above, but the neurologic status does not change and the illness continues for longer than three weeks, rabies is unlikely as the diagnosis.

Positive Indicators for Rabies

- Nonspecific prodrome prior to onset of neurologic signs
- Neurologic signs consistent with encephalitis or myelitis
 - dysphagia
 - hydrophobia
 - paresis
- Progression of neurologic signs
- Negative test results for other etiologies of encephalitis

Negative Indicators for Rabies

- Improvement or no change in neurologic status
- Illness with ≥ 2 to 3 week duration

Doctors



One to three people die in the United States every year from rabies, usually due to exposures to indigenous rabid bats, skunks, or raccoons, or to exposure to rabid dogs while traveling overseas. For this reason, it is important that rabies be considered in all cases of unexplained encephalitis. Rabies is nearly always fatal once symptoms appear, but it can be prevented almost 100% of the time when postexposure prophylaxis including rabies vaccine and immunoglobulin is administered soon after a rabies exposure occurs.

[Transmission \(/rabies/specific_groups/doctors/transmission.html\)](/rabies/specific_groups/doctors/transmission.html)

[Rabies serology \(/rabies/specific_groups/doctors/serology.html\)](/rabies/specific_groups/doctors/serology.html)

Diagnostic Laboratories



Testing for rabies in animals is done postmortem and may be necessary to determine the rabies exposure risk to humans. Samples requiring confirmation, variant typing, or formalin-fixed tissues may be sent to the CDC for additional diagnostic testing.

Page last reviewed: April 22, 2011

Page last updated: April 22, 2011

Content source: [Centers for Disease Control and Prevention](#)

[National Center for Emerging and Zoonotic Infectious Diseases \(NCEZID\)](#)

[Division of High-Consequence Pathogens and Pathology \(DHCPP\)](#)

Centers for Disease Control and Prevention 1600 Clifton Rd. Atlanta, GA

30329-4027, USA

800-CDC-INFO (800-232-4636) TTY: (888) 232-6348 - [Contact CDC-INFO](#)



Layman's view on rabies

http://www.cdc.gov/rabies/specific_groups/index.html

CDC Centers for Disease Control and Prevention

Doctors

One to three people die in the United States every year from rabies, usually due to exposures to indigenous **rabid bats**, **skunks**, or raccoons, or to **exposure to rabid dogs while traveling overseas**. For this reason, it is important that rabies be considered in all cases of unexplained encephalitis. Rabies is nearly always fatal once symptoms appear, but it **can be prevented almost 100% of the time** when postexposure prophylaxis including rabies vaccine and immunoglobulin is administered soon after a rabies exposure occurs.

4 reasons why 1-3 people died. Could they all have been killed by bats? "Can be prevented 100% of the time!"

<http://www.humanesociety.org/animals/resources/facts/rabies.html>

Understanding Rabies

Facts and safety guidelines clear up misperceptions

The Humane Society of the United States

Thanks to widespread pet vaccinations, effective post-exposure treatment, and the relative rarity of undetected bites by rabid animals, **the number of human deaths in the United States caused by rabies has declined to an average of only one or two per year—far less than the number of human fatalities caused by lightning strikes and bad hamburgers**. This doesn't mean you shouldn't take precautions to protect yourself, your family, and your pets. The best ways to guard against rabies:

1-2 deaths per year, less than lightning strikes and bad hamburgers!

Which species carry rabies?

Any warm-blooded mammal can carry or contract rabies, but the primary carriers in North America are raccoons, skunks, bats, foxes, and coyotes. Thanks to an increase in pet vaccinations, wildlife now account for more than 90 percent of all reported rabies cases.

Any warm-blooded mammal... Rabbits... (There are millions... There isn't a specific answer to how many warm-blooded animals there really is... Scientists can't even tell because there are so many... WILDLIFE (not domesticated) account for 90% of all reported rabies.

Federal and state wildlife officials have been vaccinating wildlife in many regions over the past 15 years. They distribute vaccine-laden baits that the target animals eat and thereby vaccinate themselves. Right now, oral rabies vaccination of wildlife focuses on halting the spread of specific types of rabies in targeted carrier species. Next, it's hoped that this tool can shrink the disease's range.

People and rabies

Given all the media attention that rabies regularly receives, it may be somewhat surprising to learn that very few people die from rabies nationwide each year. Over the past 10 years, rabies has killed only a total of 28 people in the U. S. This amounts to fewer than 3 fatalities a year nationwide.

People who contracted rabies in the United States were mostly infected by a bat. Most didn't even know they were bitten. Some may have been sleeping when bitten. Others handled a bat bare-handed without realizing they'd been potentially exposed to rabies. But don't panic over every bat sighting. Less than one-half of one percent of all bats in North America carries rabies.

Although raccoons suffer from rabies more than any other mammal in the United States (about 35 percent of all animal rabies cases), only one human death from the raccoon strain of rabies has been recorded in the United States.

Wikipedia

<https://en.wikipedia.org/wiki/Rabies>

In the US, the Centers for Disease Control and Prevention recommends people receive one dose of human rabies immunoglobulin (HRIG) and four doses of rabies vaccine over a 14-day period.^[60] The immunoglobulin dose should not exceed 20 units per kilogram body weight. HRIG is expensive and constitutes most of the cost of postexposure treatment, ranging as high as several thousand dollars. As much as possible

of this dose should be injected around the bites, with the remainder being given by deep intramuscular injection at a site distant from the vaccination site.[20]

Shots are no longer the horror stories of 21 painful shots to the stomach. There are 4-5 shots that are as painful as flu shots.

The first dose of rabies vaccine is given as soon as possible after exposure, with additional doses on days three, seven and 14 after the first. Patients who have previously received pre-exposure vaccination do not receive the immunoglobulin, only the postexposure vaccinations on days 0 and 3.[61]

The pain and side effects of modern cell-based vaccines are similar to flu shots. The old nerve-tissue-based vaccinations that require multiple painful injections into the abdomen with a large needle are inexpensive, but are being phased out and replaced by affordable World Health Organization intradermal-vaccination regimens.[46]

Intramuscular vaccination should be given into the deltoid, not gluteal area, which has been associated with vaccination failure due to injection into fat rather than muscle. In infants, the lateral thigh is recommended.[62]

Coincidence?

The Humane Society was encouraging these bill to the senate in 2012, they seem to touch on the same subjects that are in the ODF&W 44:

Humane Lobby Day attendees urged their legislators to support the following bills:

- S.B. 494, which bans trapping for recreation and commerce in fur; allows trapping for predator control, property damage, public safety, and research; requires trappers set traps no less than 100 feet from public premises, check traps every 24 hours, post warning signs near traps; and put an identification tag with contact information on traps

This has no similarities to 44

- H.B. 2783, to restrict the **chaining** and tethering of dogs and improve minimum care standards for dogs

Using restraints on animals.

- Legislation to crack down on chronic animal hoarders by creating the offense of aggravated animal neglect

Provision 44 states the spay and neutering of animals where there are opposite sexes in a home.

In addition, animal advocates urged their legislators to oppose the following bills:

- H.B. 2390, H.B. 2624 and S.B. 428, all of which allow increased hunting of bears and cougars with hounds, which the voters banned by passing Measure 18

No animal shall be chased by another...

Public Veterinary Medicine: Public Health

Rabies surveillance in the United States during 2005

Jesse D. Blanton, MPH; John W. Krebs, MS; Cathleen A. Hanlon, VMD, PhD; Charles E. Rupprecht, VMD, PhD

Summary—During 2005, 49 states and Puerto Rico reported 6,417 cases of rabies in nonhuman animals and 1 case in a human being to the CDC, representing a 6.2% decrease from the 6,836 cases in nonhuman animals and 8 cases in human beings reported in 2004. Approximately 92% of the cases were in wildlife, and 8% were in domestic animals. Relative contributions by the major animal groups were as follows: 2,534 raccoons (39.5%), 1,478 skunks (23%), 1,408 bats (21.9%), 376 foxes (5.9%), 269 cats (4.2%), 93 cattle (1.5%), and 76 dogs (1.2%). Compared with numbers of reported cases in 2004, cases in 2005 decreased among all groups, except bats, horses, and other wild animals. Decreases in numbers of rabid raccoons during 2005 were reported by 10 of the 20 eastern states in which raccoon rabies was enzootic and decreased overall by 1.2%, compared with 2004. On a national level, the number of rabies cases in skunks during 2005 decreased 20.4% from the number reported in 2004. Once again, Texas reported the greatest number ($n = 392$) of rabid skunks and the greatest overall state total of rabies cases (741). Texas reported no cases of rabies associated with the dog/coyote rabies virus variant and only 8 cases associated with the Texas gray fox rabies virus variant (compared with 22 cases in 2004). The total number of cases of rabies reported nationally in foxes decreased 3.3%, compared with those reported in 2004. The 1,408 cases of rabies reported in bats represented a 3.5% increase over numbers reported in 2005. Cases of rabies in cats, dogs, cattle, and sheep and goats decreased 4.3%, 19.2%, 19.1%, and 10%, respectively, whereas cases reported in horses and mules increased 9.3%. In Puerto Rico, reported cases of rabies in mongooses increased 29.8%, and rabies in domestic animals decreased 37.5%.

One case of human rabies was reported from Mississippi during 2005. This case was submitted by the state to the CDC's unexplained deaths project and diagnosed as rabies retrospectively.

Rebuttal: Unexplained 1 (although it is reported that the 10 year old had bats in his home and garage, that he removed live bat from bedroom), Skunks 0

Public Veterinary Medicine: Public Health

Rabies surveillance in the United States during 2006

Jesse D. Blanton, mph; Cathleen A. Hanlon, vmd, phd; Charles E. Rupprecht, vmd, phd
Abbreviations ORV Oral rabies virus vaccination V-RG Vaccinia-rabies glycoprotein PAHO Pan
American Health Organization DFA Direct immunofluorescent antibody PEP Postexposure
prophylaxis USDA WS USDA Wildlife Services GAT Georgia, Alabama, and Tennessee

Summary—During 2006, 49 states and Puerto Rico reported 6,940 cases of rabies in animals and 3 cases in humans to the CDC, representing an 8.2% increase from the 6,417 cases in animals and 1 case in a human reported in 2005. Approximately 92% of the cases were in wildlife, and 8% were in domestic animals. Relative contributions by the major animal groups were as follows: 2,615 raccoons (37.7%), 1,692 bats (24.4%), 1,494 skunks (21.5%), 427 foxes (6.2%), 318 cats (4.6%), 82 cattle (1.2%), and 79 dogs (1.1%). Compared with numbers of reported cases in 2005, cases in 2006 increased among all groups except cattle. Increases in numbers of rabid raccoons during 2006 were reported by 11 of the 20 eastern states where raccoon rabies was enzootic, and reported cases increased by 3.2% overall, compared with 2005. On a national level, the number of rabies cases in skunks during 2006 increased by 6.1% from the number reported in 2005. Once again, Texas reported the greatest number ($n = 351$) of rabid skunks and the greatest overall state total of animal rabies cases (889). No cases of rabies associated with the dog/coyote rabies virus variant were reported. The last identified case of this canine rabies virus variant was identified in March 2004, along the US/Mexico border. With 2006 marking the second year of no apparent transmission of the dog/coyote variant, these findings from surveillance data support the contention that the canine rabies virus variant is no longer in circulation in the United States. Total number of cases of rabies reported nationally in foxes increased 13.6%, compared with 2005. Increases in the number of reported rabid foxes were attributable to greater numbers of foxes reported with the Arctic fox rabies virus variant in Alaska, the Texas gray fox rabies virus variant in Texas, and the raccoon rabies virus variant in Virginia. The 1,692 cases of rabies reported in bats represented a 14.5% increase, compared with numbers reported in 2005, making bats the second most reported rabid animal behind raccoons. Cases of rabies in cats, dogs, horses and mules, and sheep and goats increased 18.2%, 3.9%, 12.8%, and 22.2%, respectively, whereas cases reported in cattle decreased 11.8%. In Puerto Rico, reported cases of rabies in mongooses increased 9.2%, and rabies in domestic animals, presumably attributable to spillover infection from mongooses, increased 20%.

Three cases of human rabies were reported from Texas, Indiana, and California during 2006. The cases in Indiana and Texas were attributed to bat rabies virus variants, whereas the case in California was attributed to an exposure to a dog in the Philippines.

Rebuttal: Bats 2, Overseas Dog 1, Skunks 0

Public Veterinary Medicine: Public Health

Rabies surveillance in the United States during 2007

Jesse D. Blanton, mph; Dustyn Palmer, ba; Kira A. Christian, dvm, mph; Charles E. Rupprecht, vmd, phd

Abbreviations DFA Direct immunofluorescent antibody ORV Oral rabies vaccination PAHO Pan American Health Organization PEP Postexposure prophylaxis USDA WS USDA Wildlife Services V-RG Vaccinia-rabies glycoprotein

Summary—During 2007, 49 states and Puerto Rico reported 7,258 cases of rabies in animals and 1 case in a human to the CDC, representing a 4.6% increase from the 6,940 cases in animals and 3 cases in humans reported in 2006. Approximately 93% of the cases were in wildlife, and 7% were in domestic animals. Relative contributions by the major animal groups were as follows: 2,659 raccoons (36.6%), 1,973 bats (27.2%), 1,478 skunks (20.4%), 489 foxes (6.7%), 274 cats (3.8%), 93 dogs (1.3%), and 57 cattle (0.8%). Compared with numbers of reported cases in 2006, cases in 2007 increased among dogs, bats, foxes, and skunks while decreases were reported among cattle, cats, and skunks. Increases in numbers of rabid raccoons during 2007 were reported by 11 of the 20 eastern states where raccoon rabies was enzootic, and reported cases increased by 1.7% overall, compared with 2006. On a national level, the number of rabies cases in skunks during 2007 decreased by 1.1% from the number reported in 2006. Texas reported the greatest number ($n = 362$) of rabid skunks and the greatest overall state total of animal rabies cases (969). No cases of rabies associated with the dog/coyote rabies virus variant were reported. The United States remains free of dog-to-dog transmission of canine rabies virus variants. The total number of cases of rabies reported nationally in foxes increased 14.5%, compared with 2006. Increases in the number of reported rabid foxes were attributable to greater numbers of foxes reported with the Arctic fox rabies virus variant in Alaska, the Texas gray fox rabies virus variant in Texas, and the raccoon rabies virus variant in Virginia. The 1,973 cases of rabies reported in bats represented a 16.6% increase over numbers reported in 2006. Cases of rabies in dogs and in sheep and goats increased 17.7% and 18.2%, respectively, whereas cases reported in cattle, cats, and horses and mules decreased 30.5%, 13.8%, and 20.8%, respectively. In Puerto Rico, reported cases of rabies in mongooses decreased 51.5%, and rabies in domestic animals, presumably attributable to spillover infection from mongooses, increased 25%.

One human rabies case was reported from Minnesota during 2007. Although typing of the rabies virus variant in this case was not possible, an investigation of this case indicated a bat as the most likely source of exposure.

Rebuttal: Bats 1, Skunks 0

Public Veterinary Medicine: Public Health

Rabies surveillance in the United States During 2008

Jesse D. Blanton, mph; Kis Robertson, dvm, mph; Dustyn Palmer, ba; Charles E. Rupprecht, vmd, phd

Summary—During 2008, 49 states and Puerto Rico reported 6,841 cases of rabies in animals and 2 cases in humans to the CDC, representing a 3.1% decrease from the 7,060 cases in animals and 1 case in a human reported in 2007. Approximately 93% of the cases were in wildlife, and 7% were in domestic animals. Relative contributions by the major animal groups were as follows: 2,389 (34.9%) raccoons, 1,806 (26.4%) bats, 1,589 (23.2%) skunks, 454 (6.6%) foxes, 294 (4.3%) cats, 75 (1.1%) dogs, and 59 (0.9%) cattle. Compared with numbers of cases reported in 2007, numbers of cases reported in 2008 increased among cats, cattle, and skunks and decreased among dogs, raccoons, bats, and foxes. Numbers of rabid raccoons reported during 2008 decreased in 11 of the 20 eastern states where raccoon rabies was enzootic; overall number of rabid raccoons reported decreased by 8.6% during 2008, compared with 2007. On a national level, the number of rabies cases involving skunks increased by 7.7% during 2008, compared with the number reported in 2007; this was the first increase in the number of reported rabid skunks since 2006. The total number of cases of rabies reported nationally in foxes decreased 1.7% in 2008, compared with 2007. The 1,806 cases of rabies reported in bats represented a 6.7% decrease, compared with the number reported in 2007. One case of rabies in a dog imported from Iraq was reported at a quarantine station in New Jersey during 2008. Follow-up of potentially exposed animals in the same shipment did not reveal any secondary transmission. The United States remained free from dog-to-dog transmission of canine rabies virus variants. Total number of rabid dogs reported decreased 19.4% in 2008, compared with 2007.

Two human rabies cases were reported from California and Missouri during 2008. The California case involved a recent immigrant from Mexico and was attributed to a newly identified rabies virus variant most likely associated with Mexican free-tailed bats. The case in Missouri was attributed to a rabies virus variant associated with eastern pipistrelle and silver-haired bats.

Rebuttal: Bats 2, Skunks 0

Public Veterinary Medicine: Public Health

Rabies surveillance in the United States During 2009

Jesse D. Blanton, mph; Dustyn Palmer, ba; Charles E. Rupprecht, vmd, phd
Abbreviations ED Emergency department PEP Postexposure prophylaxis

Summary—During 2009, 49 states and Puerto Rico reported 6,690 rabid animals and 4 human rabies cases to the CDC, representing a 2.2% decrease from the 6,841 rabid animals and 2 human cases reported in 2008. Approximately 92% of reported rabid animals were wildlife. Relative contributions by the major animal groups were as follows: 2,327 (34.8%) raccoons, 1,625 (24.3%) bats, 1,603 (24.0%) skunks, 504 (7.5%) foxes, 300 (4.5%) cats, 81 (1.2%) dogs, and 74 (1.1%) cattle. Compared with 2008, numbers of rabid raccoons and bats that were reported decreased, whereas numbers of rabid skunks, foxes, cats, cattle, dogs, and horses that were reported increased. Fewer rabid raccoons, compared with 2008, were reported by 12 of the 20 eastern states where raccoon rabies is enzootic, and number of rabid raccoons decreased by 2.6% overall nationally. Despite a 10% decrease in the number of rabid bats that were reported and a decrease in the total number of bats submitted for testing, bats were the second most commonly submitted animal, behind cats, during 2009. The number of rabid skunks that were reported increased by 0.9% overall. The proportion of rabid skunks in which infection was attributed to the raccoon rabies virus variant decreased from 47.3% in 2008 to 40.9% in 2009, resulting in a 12.7% increase in the number of rabid skunks infected with a skunk rabies virus variant. The number of rabid foxes increased 11.0% overall from the previous year.

Four cases of rabies involving humans were reported from Texas, Indiana, Virginia, and Michigan. The Texas case represented the first presumptive abortive human rabies case, with the patient recovering after the onset of symptoms without intensive care. The Indiana and Michigan cases were associated with bat rabies virus variants. The human rabies case in Virginia was associated with a canine rabies virus variant acquired during the patient's travel to India.

Rebuttal: Abortive 1, Bats 2, Overseas Dogs 1, Skunks 0

Public Veterinary Medicine: Public Health

Rabies surveillance in the United States During 2010

Jesse D. Blanton, mph; Dustyn Palmer, ba; Jessie Dyer, msph; Charles E. Rupprecht, vmd,
phd

AbbreviAtion PEP Postexposure prophylaxis

Summary—During 2010, 48 states and Puerto Rico reported 6,154 rabid animals and 2 human rabies cases to the CDC, representing an 8% decrease from the 6,690 rabid animals and 4 human cases reported in 2009. Hawaii and Mississippi did not report any laboratory-confirmed rabid animals during 2010. Approximately 92% of reported rabid animals were wildlife. Relative contributions by the major animal groups were as follows: 2,246 raccoons (36.5%), 1,448 skunks (23.5%), 1,430 bats (23.2%), 429 foxes (6.9%), 303 cats (4.9%), 71 cattle (1.1%), and 69 dogs (1.1%). Compared with 2009, number of reported rabid animals decreased across all animal types with the exception of a 1% increase in the number of reported rabid cats.

Two cases of rabies involving humans were reported from Louisiana and Wisconsin in 2010. Louisiana reported an imported human rabies case involving a 19-year-old male migrant farm worker who had a history of a vampire bat (*Desmodus rotundus*) bite received while in Mexico. This represents the first human rabies case reported in the United States confirmed to have been caused by a vampire bat rabies virus variant. Wisconsin reported a human rabies case involving a 70-year-old male that was confirmed to have been caused by a rabies virus variant associated with tri-colored bats (*Perimyotis subflavus*).

Rebuttal: Bats 2 (one from Mexico), Skunks 0

Public Veterinary Medicine: Public Health

Rabies surveillance in the United States during 2013

Jessie L. Dyer, MSPH; Pamela Yager, BS; Lillian Orciari, MS; Lauren Greenberg, MS; Ryan Wallace, MPH, DVM; Cathleen A. Hanlon, VMD, PhD; Jesse D. Blanton, MPH
ABBREVIATION CI Confidence interval

Summary—During 2013, 53 reporting jurisdictions reported 5,865 rabid animals and 3 human rabies cases to the CDC, representing a 4.8% decrease from the 6,162 rabid animals and 1 human case reported in 2012. Ninety-two percent of reported rabid animals were wildlife. Relative contributions by the major animal groups were as follows: 1,898 raccoons (32.4%), 1,598 bats (27.2%), 1,447 skunks (24.7%), 344 foxes (5.9%), 247 cats (4.2%), 86 cattle (1.5%), and 89 dogs (1.5%).

One human case was reported from Maryland. The infection was determined to have been transmitted via organ transplantation. Infection in the organ donor, a North Carolina resident, was retrospectively diagnosed. Both the organ donor and the organ recipient were infected with the raccoon rabies virus variant. The third human case, reported by Texas, involved a Guatemalan resident who was detained while crossing the US border. The infection was determined to be caused by a canine rabies virus variant that circulates in Central America. (J Am Vet Med Assoc 2014;245:1111–1123)

Rebuttal: Raccoons 2 (one was an organ recipient), Dogs 1 (out of country), Skunks 0

Human Rabies Cases in the United States Attributed to Bat Rabies Variants

<http://www.dshs.state.tx.us/idcu/disease/rabies/information/bats/> (updated 6/4/2015)

YEAR ¹	AGE	SEX	LOCATION	EXPOSURE LOCATION	VARIANT	INCUBATION PERIOD / PEP ² (if any)	EXPOSURE HISTORY
2014	52	M	Missouri	Missouri	<i>Ps</i> ³	1 month	found bats in home about a month prior to symptom onset; had also seen bats in warehouse (work); no known bat bite or other known contact with a bat
2012	34	M	California	California	<i>Tb</i> ⁴	~3 months	acquaintance reported that patient touched bat and believed as if bat had bitten him, but did not seek medical assistance; patient traveled through six countries while potentially infectious (died in Zurich, Switzerland)
2011	63	M	Massachusetts	Massachusetts	<i>Myotis</i> sp. ⁵	1 month	likely bitten by bat in home
2011	46	F	South Carolina	South Carolina	<i>Tb</i> ⁴	~2-3 months	likely bitten by a bat that entered her home - colony roosting in attic, history of bats in living area of house; no reported contact or bite
2010	70	M	Wisconsin	Wisconsin	<i>Ps</i> ³	unknown	spouse stated patient had been selling firewood and bats had been present in the woodpile; no bat bite reported
2010	19	M	Louisiana	Michigan, Mexico	<i>Dv</i> (vampire bat)	15 days	bitten by a vampire bat on his heel in Mexico but did not seek medical care; first reported death from a vampire bat rabies virus variant in the United States
2009	55	M	Michigan	Michigan	<i>Ln/Ps</i> ⁵	several weeks	bitten by a bat several weeks before his death
2009	43	M	Indiana	Indiana	<i>Ps</i> ³	<2.5 months?	no specific source of rabies virus exposure identified; patient had mentioned to friends that he had seen a bat close to his residence late July 2009
2009	17	F	Texas	Texas	<i>Bat</i> (unknown)	2 months / HRIG ⁶ & rabies vaccine on day 9 of hospitalization	bats in TX cave flew towards her hitting her face and arms - fought off bats with hands; there were no apparent bite or scratch marks; patient had atypical disease presentation, never required intensive care and recovered with supportive care and delayed PEP; patient was tested for multiple conditions before rabies was considered (all tests negative); rabies antibodies detected in serum and CSF; no rabies antigen detected in skin or saliva
2008	55	M	Missouri	Missouri	<i>Ln/Ps</i> ⁵	1 month	bitten on left ear by bat - did not seek treatment
2008	16	M	California	Oaxaca, Mexico	<i>Tb</i> (related)	approximately 3 months	patient was bitten by a dog while tending sheep in Mexico - bitten by a fox in same month; undocumented immigrant; last case of human rabies imported into US that has not been associated with a canine rabies variant
2007	46	M	Minnesota	Minnesota	unknown	1 month	handled bat with bare hands - felt needle prick sensation before releasing bat (there was no blood or obvious wound so he assumed he had not been bitten)
2006	10	F	Indiana	Indiana	<i>Ln/Ps</i> ⁵	possibly 3-4 months / no PEP - treatment with Milwaukee protocol	child stated that bat had scratched or bitten her; mother recalled girl waking her at night ~3 months prior to illness because a bird or bat had flown into her bedroom window and bitten her - a small mark was on her arm so her mother washed it (finding no animal upon inspection, she assumed it was a nightmare)

2006	16	M	Texas	Texas	7b	several weeks / no PEP - treatment with Milwaukee protocol	bat flew in bedroom window and brushed victim on face; bat was captured and released
2005	10	M	Mississippi	Mississippi	assumed bat (based upon rabies virus specific IgG titer; CSF RT-PCR negative)	unknown	bats commonly seen outside home; dead bats discovered inside home and attached garage; child removed live bat from bedroom and released outdoors in spring of 2005
2004	15	F	Wisconsin	Wisconsin	assumed bat (typing not possible - no viral antigen detected; RT-PCR negative)	1 month / no PEP - treatment included a drug-induced coma, ventilator support, antiepileptics and antiviral drugs (Milwaukee protocol)	bitten by bat on left index finger after picking up bat during a church service; ate released the bat outside; the wound was cleaned with hydrogen peroxide - no further medical treatment administered; first documented recovery from clinical rabies by a patient who had not received pre- or post-exposure PEP
2004	18	M	Texas	NA	7b	27 days (from transplant to symptoms)	kidney transplant recipient
2004	55	F	Texas	NA	7b	unknown	arterial transplant recipient
2004	50	F	Texas	NA	7b	25 days (from transplant to symptoms)	kidney transplant recipient
2004	53	M	Oklahoma	NA	7b	21 days (from transplant to symptoms)	liver transplant recipient
2004	20	M	Arkansas	Arkansas	7b	unknown	bitten by a bat on shoulder; discussed bite with friends but did not seek treatment
2003	66	M	California	California	L _{ni} /P _s	approximately 5 weeks / HRIG, 2 doses rabies vaccine, ribavirin, interferon-alpha	patient bitten by bat on right index finger while in bed; removed bat from home and it flew away; washed wound; admitted to hospital ER 5 weeks later at which time he received PEP
2002	20	M	Iowa or Illinois	Iowa or Illinois	L _{ni} /P _s	unknown	no history of bat contact; lived in house with a peaked attic (possibly inhabited by bats)
2002	13	M	Tennessee	Tennessee	L _{ni} /P _s	approximately 1 1/2 months	family reported patient had taken home a sick bat he found on the ground
2002	28	M	California	California	7b	unknown	numerous bats in home environment (bat colony in attic); killed a bat in house 8 days prior to symptom onset but denied direct contact - unrecognized bite at another time is most likely source of infection
2000	69	M	Wisconsin	Wisconsin	L _{ni} /P _s	unknown	patient had removed bats from his house with his bare hands several times a year; a week before admission, patient asked a friend if rabies could be acquired from an insect bite
2000	47	M	Minnesota	Minnesota	L _{ni} /P _s	2 months	patient had been awakened by a bat on his right hand; he killed the bat and was bitten in the process; did not seek medical care
2000	26	M	Georgia	Georgia	7b	approx. 1-3 months	patient rented a room in an old house; bats from the attic had been entering his living quarters and landed on him when he slept
2000	49	M	California	California	7b	2-3 months	a bat had flown into his house and he removed it

1998	29	M	Virginia	Virginia	<i>Ln/Px</i>	unknown	no known exposure to bat (worked outside while in prison); patient too ill to provide information regarding possible exposure history
1997	32	M	New Jersey	New Jersey	<i>Ln/Ps</i>	unknown	no known bite; bats found in living room on two separate occasions; had captured bats by hand
1997	71	M	Texas	Texas	<i>Ln/Ps</i>	2 months	awoke with bat on shoulder (note); removed and disposed of bat; wife did not find bite marks
1997	65	M	Montana	Montana	<i>Ln/Ps</i>	4 months	wife reported that bat had entered home through bedroom window; patient forced bat out with a broom; no direct contact known
1997	64	M	Washington	unknown	<i>Eg</i>	3 months	bitten by unknown animal/insect while working in garden
1996	49	M	Montana	unknown	<i>Ln/Ps</i>	unknown	bats seen outside home/work but had no known physical contact with bats
1996	42	F	Kentucky	unknown	<i>Ln/Ps</i>	unknown	chimney open to outside; bats had opportunity to enter house but patient denied history of animal bite
1995	74	M	California	unknown	<i>Ln/Ps</i>	unknown	no exposure identified; reclusive rancher; history of catching bats
1995	28	M	California	California	<i>Tb</i>	unknown	report of bat contact in workplace; family member believe a bat had landed on patient's chest and had been brushed off - no specific details known
1995	13	F	Connecticut	Connecticut	<i>Ln/Ps</i>	1 month	siblings reported flying animal in room where child was sleeping
1995	4	F	Washington	Washington	<i>Myotis</i> sp.	1 month	found rabid bat in bedroom where child was sleeping
1994	24	F	Alabama	Alabama	<i>Tb</i>	unknown	disposed of dead/dying bats from chimney or attic
1994	42	F	Tennessee	unknown	<i>Ln/Ps</i>	unknown	reported no exposure to rabies but had numerous bats in residence; had 26 unvaccinated pets
1994	41	M	W. Virginia	W. Virginia	<i>Ln/Ps</i>	4 months?	handled mouth of bat described as possible red bat (likely was a reddish colored tricolored bat); woodsman
1994	44	M	California	unknown	<i>Ln/Ps</i>	9 months?	cared for sick cat
1993	82	M	Texas	Tx or AR?	<i>Ln/Ps</i>	unknown	no known animal bite (tended sick cow)
1993	11	F	New York	New York	<i>Ln/Ps</i>	unknown	captive bat in cage in house
1991	27	F	Georgia	GA or TN?	<i>Ln/Ps</i>	unknown	no known animal exposure; patient not questioned or too ill to provide information
1991	29	M	Arkansas	Arkansas	<i>Ln/Ps</i>	3-4 weeks?	caught and killed abnormally behaving bat during month preceding onset of symptoms
1990	22	M	Texas	Texas	<i>Tb</i>	47 days	bitten on finger while handling bat

Summary Responsible Pet Owners

Bella is our pet skunk, she is 3 years old. Bella lives with my husband and I in our home. She has her own personality. Bella will stomp and flair her tail when she wants to play. She loves to lay on the couch with my husband for hours. Bella is fed a meal, not just a bowl of food on the floor. I make her dinner of meat, dairy, fruits and vegetables every night. When she hears the refrigerator door open at 6pm, she knows it's time for dinner. While I make her dinner she sits on my foot, I take this as a thank you from her.

Our adult daughters always comment that Bella is treated better than some children are, and they are right. You could say Bella is spoiled.

She gets clean bedding three times a week, her potty box is cleaned on a regular basis and even though she's not thrilled about them, she gets her baths. Her nails get clipped and her face washed.

Bella gets her toys and a digging box to search for "surprises".

Bella gets regular vet checkups. She gets any shots that are necessary. Bella has never known what a flea is.

Most of all, Bella is loved. She gives us more than we expected when we acquired her from a USDA breeder. She gives us love, comfort, companionship, joy and a sense of being needed. She is someone to come home to.

We have even discussed plans for Bella in the case that she out lives us. I believe you could call us bizarre for our choice of pet, but not at all, since I am unable to have a cat and our landlord does not allow dogs. We researched skunks before making the decision to get one. We even researched vets and had an appointment before Bella even arrived. We researched diets, baby proofing our home and the "Do's and Do Not's" about skunks.

Bella doesn't disturb the neighbors, she doesn't bark, she doesn't potty in their planter boxes.

If Bella were to pass, I'm not sure if I would acquire another pet. I would be devastated to lose a family member. Although, if I were to eventually want a pet skunk, I would find it hard to because of your restrictions. I would like to think I've been a responsible pet owner and have the honor to welcome another pet skunk into our home.

Bella is just as much a part of our family as your pet is yours. Please consider the requirements and restrictions you are asking of us. Consider if you were to be required to adhere to them for your own pet.

Sincerely,
Marilyn, Mike and Bella

Coversheet for ODFW Commission Hearing

1. "AZA Accreditation for Domesticated Pet Skunks is Wrong" statement
2. Copy ODFW Commissioner letter from 2/22/16

A couple of the ODFW officials suggested that we draft clearer language, after I mentioned that some of the Division 44 rule changes were ambiguous and confusing. #3 and #4 came as a result of this, with the input from many skunk owners

3. Statement regarding changing the classification of "mammals", which is an "all-inclusive category", to the following two categories:
 - a) mammals that are "potentially dangerous" (cougars, bears, bobcats, etc)
 - b) mammals that are "not potentially dangerous" (skunks, squirrels, raccoons, etc)
4. Division 44 "New Revised Proposal" from Oregon Domestic Captive Born Pet Skunk Owners
IMPORTANT – Please note that AZA requirements need to be removed for current or future skunks for 635-044-0020, and anywhere else mentioned in the document. Please note this additional change, and please consider adding it to the Division – 44 rule changes.
5. Mirabella Diaries – in the event you haven't ever owned a pet skunk, this will acquaint you to what it is like having one.

Should you have any questions about any of these items, please feel free to contact me at the following:

Melinda Hodge (503)468-0599
lazyJranch100@yahoo.com
P.O. Box 811 Astoria, OR 97103

Respectfully,



Melinda Hodge

AZA Accreditation for Domesticated Pet Skunks is Wrong

I am in total disbelief that owners of domestic "captive born skunks" should be forced to seek AZA Accreditation. The ODFW Division 44 Draft rules state that "a person or facility adding to their collection of these species (larger mammals, furbearers, pet skunks) or any new facility wanting a permit would need to be accredited by the AZA before obtaining a holding permit for these species".

ODFW claims the reasons for these rules involves disease, such as rabies and distemper, and human safety issues. All mammals, including humans can get or carry the rabies virus. The Center for Disease Control has no record of human deaths from rabid wild or domestic pet skunks for more than 65 years. ODFW is focusing on an issue that has been non-existent amongst all skunks for many years. Moreover, a "domestic" pet skunk housed indoors, would pose no threat, at all. After extensive research, I was unable to find any record of a "captive born" domestic skunk living in a home environment, having rabies. Research by the CDC shows that dogs, and house cats that have not received their shots pose a much greater risk. Perhaps the focus should be on getting more responsible pet owners to get the appropriate shots for their cats and dogs. If ODFW is really concerned about rabies amongst "domestic" skunks, they would do the opposite of what they are proposing, and require that our skunks be housed in a safe indoor environment, and mandate that all other indoor pets, such as cats or dogs that our pet skunks are exposed to receive rabies and distemper shots. This would mean that pet skunk owners would need to furnish ODFW with proof that their other animals that the skunk is exposed to have received their rabies and distemper shots.

Page 19, of the 2016 Accreditation Inspectors Handbook, states that for the purposes of the AZA's accreditation program, a zoological park or aquarium is defined as: "A permanent (indefinitely continuing) institution which owns and maintains *wildlife* (non-domesticated animals), under the direction of a professional staff, provides its animals with appropriate care, and exhibits them in an aesthetic manner to the public on a regular basis. The institute, division, or section shall further be defined as having as their primary mission the exhibition, conservation, and preservation of the earth fauna in an educational and scientific manner".

It is abundantly clear, that the reason why ODFW has chosen to place pet skunk owners under the jurisdiction of AZA is because they want to eliminate all prospects of any current skunk owner ever having another pet skunk again in the future. AZA proudly proclaims that fewer than 10% of the animal exhibitors meet the licensing requirements to be accredited. These larger institutions, such as zoos and aquariums have considerable resources to provide adequate staff and research, not to mention facilities that cost millions of dollars. How many of you proposing the AZA criteria, could meet the given requirements that you are asking for us to meet? If you can't meet them with all of your resources, then how do you expect that we do the same?

Furthermore, a skunk is an indigenous species to North America and is in abundance, and not endangered, with no need for conservation measures. ODFW cares nothing about the conservation of the skunk species. Rather, ODFW has recently dictated that trapped skunks be killed, rather than be taken to wildlife rehabilitation facilities. Moreover, ODFW wants for our house pets that have been raised indoors to be forced to live isolated outdoors in a cage, which will constitute inhumane treatment of our beloved pets, and cause an early demise. It would also allow for vector borne diseases to be widespread amongst our skunks caged outside, whereas it would be virtually non-existent if our skunks

were allowed to continue to live indoors, as they always have. Our pet skunks will virtually become a "bait" for all sorts of diseases, including rabies and distemper. Our skunks would also be exposed to predators and unauthorized individuals. Once again, if ODFW wanted to lessen these diseases, they would mandate the complete opposite, which is to house our pet skunks in a safe home environment, rather than an outside unsafe cage environment, which would be detrimental to the physical, mental, and social well-being of our domestic skunk.

In reading just a portion of the information obtained from the AZA, as a domestic skunk owner, I am expected to abide by the following criteria which was obtained from various AZA sources.

- Maintained strollers, wheelchairs for public
- Provide a mission statement
- Photos showing my institution on a typical day of operation
- Animal inventory in taxonomic order
- Provide plan on responsible population management
- Provide food analysis report
- Protocol exposure times, animal handling in touch pool or petting environment
- Institute vet program
- Written euthanasia policy
- Conversation action plan
- Educational activities, including multi-cultural, special needs, conservation
- Formal committee to review research
- Furnish copy institutional constitution, charter and bylaws
- Volunteer program
- Details support organization
- Written financial contingency plan
- Capital improvements
- Info on holding facilities, laboratory,
- Animal hospital, quarantine facilities
- Emergency life support system
- Zoonotic training
- Written procedure, training handling of hazardous materials
- Perimeter fence
- Guest services, gift shop
- Master plan, strategic plan
- Prove record continued growth
- Proper ratio males to females maintained
- Animals protected from weather and adverse conditions
- Provide USDA exhibitor license #
- Provide Institutional Collection Plan
- Institutional Collection Plan
- CITES I, SSP, ISIS, ARKS, ZIMS registration
- Training in AZA record keeping
- Description animal training program
- Hand washing stations, signage, first aid stations
- Ambassador animal policy
- Animal enrichment and training program
- Protocol for animal restraint and capture
- Browse diet and enrichment program
- Involvement in SSP, TAGS, SAGS, CAPS, FCCS
- Provide appropriate library, internet
- Research related policies
- Animal care and use committee
- Details of governing bodies
- Provide info full and part time staff
- Copy audited financial statement
- Furnish annual operating budget
- Proof liability insurance
- Maintenance program
- Information on isolation facilities, surgery rooms, necropsy room
- Risk management, safety audit plan
- Safety data sheets
- Live action emergency drill reports
- Fire drill training
- In house safety committee
- Accessible bathrooms, water fountains, benches, maps, brochures
- Enclosure must meet physical, psychological, and social needs
- Meet sociobiological needs
- Adequate pest control program

- *Shelter to protect from heat, cold, rain*
- Timing and location of food should be biologically stimulating
- Panic hardware for exits
- Provide access to animal care manuals specific to the animals in my institution (It should be noted that amongst the animal care manuals, both completed and in progress by the AZA, that there is no manual written about the proper care of skunks. How then, can the AZA "experts" in skunk care dictate to us how to best care for our skunks, when they are not adequately trained in caring for the domestic skunk themselves).
- Adequate vet response time
- CEO, director available full time
- Plumbing, heating, lighting adequate
- Sidewalks, roads good repair

It should be noted that as a responsible pet skunk owner, I exceed any requirements necessary for the health and welfare of my skunk, which includes physical, social, and emotional needs. This also includes a proper diet, and enrichment, and play activities. I provide a warm and safe loving home environment, safe from predators and disease. For the safety of my skunk, I do not wish to expose her to unknown members of the public. I also have vet visits 5 times a year.

These are just a few of the expectations set forth by the AZA. The AZA sources used are The Accreditation Questionnaire (Application), The Accreditation Visiting Committee, The Guide to Accreditation of Zoological Parks and Aquarium, and The Accreditation Standards and Related Policies.

The outside cage requirements set forth by the ODFW, would make the following categories required by AZA impossible to attain:

1. Proper ratio males to females (ODFW limits us to two skunks)
2. Animals protected from heat, cold, rain
(ODFW requires outdoor cage, designed for a different species and will not protect from extreme temperature or weather conditions)
3. Shelter must meet physical, psychological, and social needs
(ODFW caging requirements will have devastating effects on the physical, psychological, and social needs of the pet skunk)
4. Adequate pest control system (skunks cannot safely be exposed to pesticides)

Moreover, I do not meet any of the basic criteria needed to receive AZA accreditation. Some of this criteria is as follows:

1. My skunk is "domesticated", and not "wild" and therefore not eligible.
2. I do not need to employ any full time staff to care for my one skunk. I can do a great job by myself.
3. I do not wish to pursue scientific studies, or research related to my pet skunk. I have fully researched what I need to know.
4. I do not wish to have my home or grounds open to the public, nor pursue educational or multicultural related venues
5. I cannot have my skunk engage in breeding activities, as the ODFW guidelines require that she be fixed, and I am limited by the ODFW guidelines to have no more than 2 skunks. The AZA guidelines in the handbook state that my skunk must be managed for long term viability of the species, i.e. ex-situ breeding.

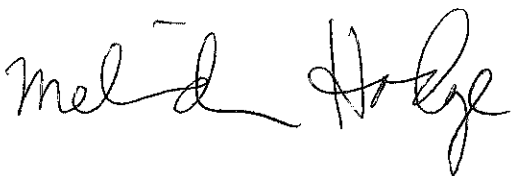
As can clearly be seen from the aforementioned information, it will be impossible for any skunk owner to meet the AZA standards, which are in direct opposition to many of the ODFW requirements. Furthermore, none of these criteria serve to better the lives of our pet skunks in any manner whatsoever.

The AZA criteria, will create a lot of unnecessary paperwork, and an incredible monetary expense for the skunk owner. In addition, it will create an enormous amount of wasted time, all of which is unnecessary, in the first place. It will also create a lot of unnecessary paperwork, travel, and additional supervisory staff for AZA, in order to administer these rules. Travel, food, and lodging expenses for a minimum of two inspectors, for 1 ½ days will be required. As a tax payer, I resent being forced to pay for such unnecessary and wasteful practices that I consider inhumane to my pet skunk, and frankly constitute an over extension of power, that I consider abusive towards me and other rightful pet skunk owners, and in violation of my rights as a responsible and loving domestic pet skunk owner.

As a concerned citizen, and pet skunk owner, I would like to obtain statistics as to how many owners of one domesticated skunk, have been able to meet the AZA certification guidelines? How many individuals have applied for certification? What is the breakdown of how many individuals have received certification on their first try vs. those who have been turned down? What is the precedence for this requirement? What other household pets are required to meet these AZA requirements? What is the success rate for those animals meeting AZA standards for one pet?

I hear by ask that the AZA clause be removed from the Division 41 – rule changes, as it is in direct opposition to common sense, is totally unnecessary, and is mean spirited in its intent to prevent any future skunk owners in the state of Oregon. I ask that I be able to retain the right to own a pet skunk, and to be able to continue to raise my skunk, as well as future skunks, in a loving and nurturing environment in my home, without uncalled for intervention or harassment by ODFW, AZA, or any other agency related in similar intent or purpose. *A simpler and more cost efficient solution for all pet skunk owners and the agencies involved, would be to continue to allow our pet skunks to live in their home environment as they have grown accustomed, and to continue to allow us that right as responsible pet owners.*

Respectfully,

A handwritten signature in black ink, appearing to read 'Melinda Hodge'. The signature is fluid and cursive, with the first name 'Melinda' written in a larger, more prominent script than the last name 'Hodge'.

Melinda Hodge

February 22, 2016

Dear ODFW Commissioner,

I am writing to you concerning the Division 44 rule changes and/or additions proposed by ODFW. These changes affect the life and welfare of my "domestic" skunk.

Please take "domestic" skunks off of the "banned list", as they do not belong in that category. The ODFW Division 44 rule revisions that concern me the most because of the negative impact they will have on any legal pet skunk are the following:

1. 635-044-0020 (Item 3 caging standards)
2. 635-044-0020 (Item 3c lip tattoo and implanted radio frequency device - RIFD)
3. 635-044-0020 (item 2 skunks shall be only held at accredited facilities, or as "approved" by director)
4. 635-044-0020 (item 3b limit of two skunks without approval of director)
5. 635-044-0025 (item 1c signed and notarized affidavit)
6. 635-044-0040 (items 1c, 1d, 1e requirements for care of wildlife in captivity)
7. 635-044-0075 (item 1 failure to comply with "any" rule or condition of authorization may result in confiscation or disposal of wildlife)
8. 635-044-0080 (item 1 denial of license or expiration of permit will result in killing of said animal, holding in a facility, or exportation out of state)
9. 635-044-0085 (control of disease outbreaks in captive wildlife)

I am a resident of Oregon, and a lawful skunk owner, having met all the requirements set forth by ODFW, and meet the USDA rabies free facility requirements. I am writing to you on behalf of the rights and interests of all legally obtained pet skunks, and their informed and educated owners.

Like ODFW, I feel it should be illegal to directly take an animal from the wild, as a pet. However, I beg of you to make a distinction between "wild" and "domestic" skunks, so that our legally obtained skunks can live in a "house setting", and not the "cage" requirement parameters as set forth by ODFW.

My vet recommendations for pet skunks are that whenever possible, skunks should not be caged, and should live in a home environment.

The American College Dictionary, defines "wild", as animals who have not been "tamed" or "domesticated". In contrast, "domesticated" refers to living with man; "tame". Webster Dictionary also uses the same definition.

Some domestic skunk breeders have been in existence for over 65 years. One example is Ruby Farms in Iowa, where many of the domestic raised skunks in Oregon are obtained. These breeders are responsible for having developed many of the colors and patterns in domestic skunks that are different from that found in the wild. These skunks have evolved from what one knows as the typical "wild skunk" in many ways, and are therefore different.

Being taken from the home that they know, love, and have grown accustomed to and being forced to live in an outside cage would be detrimental to the mental and physical health of our skunks for many reasons. Just imagine how traumatic it would be for one's beloved pet skunk to be forced to live isolated from the family the skunk has come to know and love.

ODFW Division 44 rule revision (635-044-0040) states that any animal held in (635-044-0020) must conform to the following criteria:

(Item 1c) states that the required outdoor shelter should protect from adverse weather and predators, and prevent injury, and/or escape. The required cage structure would do just the opposite. Skunks would be exposed to extreme temperatures, either hot or cold, and heavy blowing rain or wind. People or predators could easily reach through the wire cage and harm the skunk, or allow for the skunk to escape the confines of the cage.

(Item 1d) must provide veterinary care to relieve "distress" from injury, neglect, or disease. Veterinary care would be required to care for depression, stress and trauma related behaviors. Medical issues, which include loss of appetite, pacing of cage confines, self-mutilation, injuries to teeth and nails, loss of hair (and yellowing of whatever hair remains), weight loss, and bone density issues would also arise.

Additionally, the skunk would be exposed to vector-borne diseases, which include bacterial, viral, and parasitic diseases, which are transmitted by mosquitos, ticks, and fleas. Insects or rodents would be attracted to the food and feces.

Mental health problems, depression, and behavioral issues would result from being forced to live apart from the loving family the skunk has chosen to know and accept. Additionally, the skunk would no longer be provided with intellectual challenges and stimulation provided by the opportunity to explore, play, and interact with his/her human and animal family.

(Item 1e) states that skunks must have continuous access to the caged area, with adequate space for exercise. Inside the home environment, the skunk had more than adequate space to run around and play with its family and toys. Additionally, the owner was provided with the opportunity to take the skunk for walks, to play, and to explore the outdoors, if so desired. The running and play space within the cage is very limited, and does not provide ample opportunity for social interaction nor the stimulation needed to provide continued interest in the skunk's surroundings.

ODFW Division 44 rule revision (635-044-0085 item 1) states that diseased wildlife may be considered a threat to public, wildlife, and domestic animals. The "domestic" skunk is more likely to catch diseases if it is in a cage outside and allowed to come in contact with other animals that are sickly. A skunk in the controlled environment of its own home, with other "house pets" that are healthy would more likely be healthy, as well. This is especially true when the animals are given adequate medical care and are up to date on all shots and inoculations.

(635-044-0085 item 2) states that said diseased animal may be euthanized, confined, or transferred. Many diseases can be cured. Who determines if the skunk is diseased? A veterinarian or an ODFW official?

The ODFW Division 44 rule revision (635-044-00203 g, a) which says that we are only able to remove our skunk from such confines for visits to accredited veterinarians is nothing short of "animal abuse". My skunk's health and wellbeing would quickly deteriorate and I believe that she would give up her will to live if she were forced to be caged in such an inhumane manner.

Any responsible domesticated pet skunk owner can attest to the fact that skunks share many of the wonderful qualities of a dog and a cat. In fact, I consider my skunk to be the most loving and affectionate pet I have ever had! Being that domesticated pet skunks are so similar in behavior to cats and dogs, I feel they should be afforded with the opportunity to live with their human families in much of the same way that dogs, and cats live and play. They chose to sleep under the warmth of bed covers with their human family, they play with their cat and dog families, and they play with many pet and/or infant toys. They are very bright and interactive with their environment and need stimulating activities. They have the opportunity for plenty of exercise running around the house, and playing with their human and animal counterparts. I doubt that any of the attributes aforementioned would describe a "wild" skunk.

Through body language and vocal expression, domesticate skunks express their desire to be picked up and be cuddled with their family, or to be put back down on the ground. Skunks like to follow their owners around and frequently initiate play. They choose to interact with their human family, in direct contrast to being forced by their human family to interact.

"Domestic" skunks should be classified in a different category than a "wild" skunk. As stated by the ODFW Division 44, there are different classifications for "wild" rabbits vs. "domestic" rabbits etc. Unlike a rabbit or a ferret, most skunks do not engage in behaviors that may require that they be caged inside the home when the owner is absent. Most skunks within the home are given the same liberties that most indoor cats or dogs are given. Surely this distinction cannot be made for "wild" skunks, or for the "wild" ermine and weasels that ODFW have determined must live outdoors in the same type of caged environment.

Nor should they be grouped amongst large predatory animals such as bears, cougars, or wildcats. A skunk is a scavenger, eating whatever it can find, such as bugs, fruit, vegetables, nuts, etc. The "domestic" skunk poses no threat whatsoever to mankind. Without a scent gland with which to spray predators, they are helpless. Skunks are indigenous to the North American continent, and pose no risk to other animals or to the habitat. Skunks are also not on the "endangered" list. Why then is there perceived to be a need to have these helpless animals lip tattooed or implanted with a Radio Frequency

Identification Device? Studies show that these means of identifying such animals can "kill" or "harm" them, and should be deemed as totally unnecessary.

The facility standards are ambiguous. (ODFW Division 44 rule revision (635-044-0020 item 2)). Domesticated skunks do not fall under the clause for "accredited" facilities, yet "approved by director" is too vague. What guidelines must the director follow, and how can one ensure that there is a consistent and fair basis for decision making?

The statement concerning the failure to comply with "any" rule or condition of authorization may result in confiscation or disposal of wildlife greatly concerns me. ODFW Division 44 rule revision (635-044-0075 item 1). Skunks here legally now, may be deemed illegal if new paperwork that was not required at the time of import is required. ODFW already has copies of any paperwork that was required for domestic skunks to get a legal permit. Therefore, pet skunk owners should not have to resubmit said paperwork, nor be required to furnish new paperwork that may be impossible to get from out of state in a timely manner.

The requirement for the signed and notarized affidavit stating the grandfathered animal was legally acquired is unclear. ODFW Division 44 (635-044-0025 item 1b). The domestic skunks have to be acquired from out of state, and therefore it would be impossible to get this without traveling out of state. All animals properly brought into the state of Oregon already were licensed and approved to remain in the state. Why must the owner get a notarized affidavit, when they already have been approved and recognized by ODFW? Current owners that have already met ODFW requirements should be grandfathered into being exempt from the notary requirement. What does an owner do if their skunk was legally licensed to come into the state of Oregon, having met all requirements of ODFW, but is unable to obtain information from the owner because the breeding facility is no longer in existence?

The denial of license or expiration of permit will result in killing of said animal, holding in a facility, or exportation out of state ODFW Division 44 (635-044-0080). Will the pet skunk owner be notified in a timely manner when a permit needs to be renewed? The vast majority of skunk owners, and many exotic veterinarians I have spoken to were never informed of the Division 44 pending rule changes, and I understand that it is a requirement that everyone should have been informed. After all, we registered our pets and met all of the requirements of ODFW. Our contact information should be on file. If ODFW or the pet skunk owner makes a mistake, it could result in the death of one's domestic skunk. A pet skunk's life is too important to be caught up in this sort of bureaucracy. If an owner unwillingly makes a mistake, then perhaps a "fine" or a "warning" would be more appropriate, rather than overreacting and killing or seizing an innocent animal.

(635-044-0020 item 3b) states that no more than two skunks may be held on a wildlife permit, without approval of director. How is this determined? It must not be on the square footage of the house, since ODFW wishes to confine all skunks outside of the dwelling isolated in a cage. How can one ensure fair treatment on this issue? Please allow for owners to have the discretion to own more than two skunks, and once again allow for them to live in the owner's home, which is in their best interests. Perhaps this should be based on a city by city or county by county basis in regards to the number of small pets allowed in a household.

Allowing for more than two skunks per family could generate more money for the state through licensing and/or permits. It is unfortunate that breeding facilities are not allowed in the state of Oregon.

If they were allowed, a lot of extra money could be brought into the state in that manner. It would also lessen the amount of paper work ODFW must have to deal with in receiving exports from outside of the state. It would also allow for ODFW to better ensure that their standards are being met within breeding facilities. After all, doesn't ODFW and the pet owner both want the highest standards of breeding, in order to ensure that one purchases a healthy pet skunk that will be around for many years to come?

I have the following questions for the ODFW staff whom have made the determination that "domestic" skunks should be subjected to live in an outdoor cage:

1. Why is this cage required for an indoor "domestic" skunk?
2. What is the scientific basis for determining that a "domestic skunk" should be placed in a cage environment similar to that established by ODFW for "wild" ermine and weasels?
3. What recognized scientific study says that "domestic" skunks should not live in a home environment?
4. How many "domestic" skunks raised in a home environment were tested in this study?

I beg you to reconsider creating any rule that will have such a negative impact on the safety, health, and welfare of our beloved "domesticate" skunks. As "domestic" skunk owners, we truly only want what is best for our pet skunks. And what is best, would be to continue living in the family environment in a home to which it has grown accustomed. In a safe home, there would be no need for the potentially dangerous lip tattoos, or RIFD (Radio Frequency Identification Device) that ODWF also wants as a requirement.

"Domestic" skunks are "house pets" and should not be "caged animals". They deserve the same treatment as cats and dogs. **Again, please recognize that there is a difference between "wild" and "domestic" skunks, and remove our legal pet skunks from the "banned wild animal" list.**

Respectfully,

Melinda Hodge

P.O. Box 811

Astoria, Oregon 97103

(503) 468-0599

Within the classification of mammals within the provisions of the proposed changes to the current Fish and Wildlife regulations, it should be shown that a clear and definite distinction is made between those animals that are considered as potentially dangerous (i.e.; Black Bear, Cougar, Bobcat, Wolf) and those mammals that are not as potentially dangerous (i.e.; Raccoon and Skunk).

Whereas it is recognized mammals in the potentially dangerous category can be lethal to humans if encountered in the wild. These mammals can be aggressive to humans without provocation. The mere body size, muscular power, size of their jaws/teeth and the power of the muscles of same and the size and power in the paws and claws of animals in this category make them dangerous to humans. Humans that rehabilitate, or keep as pets, the mammals in this category do so with the full understanding of the danger of which they are capable.

Mammals in the category of non-dangerous animals, raccoons and skunks, although in the wild can at times be a nuisance, are not dangerous or aggressive toward humans that are not threatening to them, their dens or their young. Mammals in this non-dangerous category are more likely and more often chosen as domestic pets. They are kept indoors as a common dog or cat is kept indoors. They are not caged, and particularly not caged in outdoor enclosures. If an owner of a legally obtained domestic pet skunk or raccoon chooses to build an indoor enclosure for the safety of their pet at times when they would be unsupervised, that should be completely at the owner's discretion.

For members of the Fish and Wildlife Division to make a statement that by law, they cannot distinguish between the different species of animals as potentially dangerous or non-dangerous is a complete disservice to the animals mentioned above for the non-dangerous category. At the present time, and for decades prior to now, Oregon has permitted citizens to obtain and keep skunks and raccoons as pets as long as they are obtained legally, following standards set forth by the Oregon Fish and Wildlife Division. Because raccoons and skunks have had the distinction of non-dangerous in years and decades past, and legally able to be purchased as pets from licensed breeders outside of the state of Oregon and imported to Oregon, it is obvious the distinction of non-dangerous mammal is already recognized for these species.

To place raccoons and skunks into the same category as mammals that are potentially dangerous is unnecessary and a grievous miscarriage of justice.

NEW REVISED PROPOSAL FROM OREGON DOMESTIC CAPTIVE BORN PET SKUNK OWNERS

Revisions to the following rules are indicated by deleted words and sections in brackets with strike through [word]; new words, sentences or significantly revised sections in bold and underlined; and original wording was left unchanged in the text. The Wildlife Rehabilitation section was removed and placed in a new Division 62 of Chapter 635 of the Oregon Administrative Rules.

DIVISION 44

NEW DIVISION TITLE:

PROTECTED WILDLIFE, HOLDING, AND PROPAGATING RULES

[HOLDING, PROPAGATING, REHABILITATING, AND PROTECTED WILDLIFE]

ODFW DRAFT Revised Rules Chapter 635 - Division 44 January 2016 page 2 of 24

DIVISION 44 PROTECTED WILDLIFE, HOLDING, AND PROPAGATING RULES

635-044-0000 Purpose The purpose of these rules is to[regulate the] identify the species of wildlife that are protected , wildlife that may be held, conditions for holding, and regulate the propagation of game birds and other native wildlife except those cervids regulated [pursuant to] by OAR chapter 635, division 49. [to regulate the rehabilitation of wildlife and to list species determined to be protected nongame wildlife] Stat. Auth.: ORS 496.004, 496.012, 496.138, 496.146, 497.298, 497.308, 497.312, 497.318, 498.022, 498.029, 498.052, 498. 222 & 498.242 Stats. Implemented: ORS 496.012, 496.138, 496.146, 497.298, 497.308, 497.312, 497.318, 498.022, 498.029, 498.052, 498. 222 & 498.242

635-044-0002 Taxonomy (1) Scientific taxonomic nomenclature reflects the following: (a) Fish: (A) Nelson, J. S., E. J. Crossman, H. Espinosa-Perez, L. T. Findley, C. R. Gilbert, R. N. Lea, and J. D. Williams. 2004. Common and scientific names of fishes from the United States, Canada, and Mexico. American Fisheries Society, Special Publication 29, Bethesda, Maryland. (B) Moyle, P. B. 2002. Inland fishes of California. Revised and expanded. University of California Press. Berkeley, California. (C) Jelks, H.L., S.J. Walsh, N.M. Burkhead, S. Contreras-Balderas, E. Diaz-Pardo, D.A. Hendrickson, J. Lyons, N.E. Mandrak, F. McCormick J. S. Nelson, S. P. Platania, B. A. Porter, C.B. Renaud, J.J. SchmitterSoto, E. B. Taylor, and M. L. Warren, Jr. 2008. Conservation status of imperiled North American freshwater and diadromous fishes. Fisheries. 33(8): 372-407. (b) Amphibians and reptiles -- Crother, B. I., editor.[2008] 2012. Scientific and standard English names of amphibians and reptiles of North America north of Mexico, with comments regarding confidence in our understanding. 7th Edition. Society for the Study of Amphibians and Reptiles, Herpetological Circular No. 37. (c) Birds -- Marshall, D.B., M.G. Hunter, A.L. Contreras, editors. 2003. Birds of Oregon: A General Reference. Oregon State University Press. Corvallis, Oregon [Chesser, R.T., R.C. Banks, F.K. Barker, C. Cicero, J.L. Dunn, A.W. Kratter, I.J. Lovette, P.C. Rasmussen, J.V. Remsen, Jr., J.D. Rising, D.F. Stotz, and

ODFW DRAFT Revised Rules Chapter 635 - Division 44 January 2016 page 3 of 24

498.029, 498.052, 498.222 & 498.242 Stats. Implemented: ORS 496.012, 496.138, 496.146, 497.298, 497.308, 497.312, 497.318, 498.022, 498.029, 498.052, 498.222 & 498.242]

Stat. Auth.: ORS 496.012, 496.138, 496.146, 497.298, 497.308, 497.312, 497.318, 498.022, 498.029, 498.052, 498.222 & 498.242 Stats. Implemented: ORS 496.012, 496.138, 496.146, 497.298, 497.308, 497.312, 497.318, 498.022, 498.029, 498.052, 498.222 & 498.242

635-044-0020 Holding of Live, Wild Black Bear (*Ursus americanus*), Cougar (*Puma concolor*), Bobcat (*Lynx rufus*), Wolf (*Canis lupus*), Raccoon (*Procyon lotor*) and Skunk (*Mephitis spp.*) (1) Black bear, cougar, bobcat, wolves, raccoon and skunk held in captivity require a Wildlife or Wolf Holding Permit for each species held. (2) Black bears, cougars, bobcats, wolves, raccoons and skunks acquired by transfer or new holding application, and following adoption of these revised rules (March 18, 2016), shall only be held at Oregon AZA accredited facilities or as approved by the Director. (3) Black bears, cougars, bobcats, wolves, raccoons and skunks held legally prior to the adoption of these rules may only be held at AZA accredited facilities or in Department approved facilities meeting standards defined in the Oregon Enclosure and Caging Standards for Holding Wildlife (Exhibit 1). The facilities housing legally acquired black bear, cougar, bobcats, wolves, raccoons and skunks must meet the minimum facility standards defined herein within one year following the adoption of these rules.

The exception to the above proposal would be domestic captive-bred, born and raised skunks to be sold as pets. Oregon residents who own or wish to own a skunk as a house pet must follow the proper procedures set forth to obtain and keep said skunk or skunks as house pets. Oregon does not allow licensing of skunk breeders within the state. All skunks purchased for the purpose of becoming house pets must be imported from a state allowing the licensing of domestic captive-bred skunk breeders. All breeders must provide their license number for breeding skunks for their respective state to the purchaser of every skunk sold as a pet. Domestic captive-bred skunk breeders must also certify the domestic captive-bred and sold skunk has been surgically altered to have their scent glands removed prior to sale to residents of Oregon. Oregon residents will be required to purchase a propagator's permit for their pet skunks from the Oregon Division of Wildlife. This permit will be offered for a nominal fee. One permit will be all inclusive of the animals owned and kept on owner's premises. This permit must be renewed annually by the domestic captive-bred skunk owner.

Owners of domestic captive-bred pet skunks are exempt from the maximum set forth below. Owners of pet skunks, legally obtained and included on their annual propagators permit, can own more than two skunks as house pets. Owners of domestic captive-bred pet skunks are exempt from the need to meet minimum facility standards as set forth in the proposed ban. Domestic captive-bred pet skunks will be permitted to remain as house pets without caging requirements.

Skunks purchased and permitted as domestic captive-bred pets are not subject to the outdoor caging requirements. Skunks bred and sold as pets are assumed to be house pets and will be treated as house pets as would a cat or dog. If the domestic captive-bred skunk owner takes the pet skunk out of the house it is to be restrained by leash or other means that will protect the animal from the general public and the general public from the animal.

(a) No more than one black bear, one cougar, and one bobcat may be held on a Wildlife Holding Permit unless approved by the Director. (b) No more than two raccoons, two skunks, or two wolves may be held on a Wildlife Holding Permit without approval by the Director. (c) Black bears, cougars, bobcats,

wolves, raccoons and skunks must be marked permanently with either a lip tattoo and/or implanted Radio Frequency Identification Device (RFID). Skunks under the classification of domestic captive-bred pets are not subject to the requirement of lip tattoos or Radio Frequency Identification Devices (RFID). Holders of grandfathered animals, as defined in 635-044-0025, shall meet the

ODFW DRAFT Revised Rules Chapter 635 - Division 44 January 2016 page 12 of 24

documentation requirements within one year from the adoption of these revised rules (March 18, 2016). (d) Live black bears, cougars, bobcats, wolves, raccoons, and skunks shall not be removed from the wild with the exception of animals captured and placed by the Department in an AZA accredited facility, or in an approved licensed Wildlife Rehabilitation facility, or under a Scientific Taking Permit (OAR 635-043-0023) or as nuisance wildlife captured by permit (OAR 635 Div. 435) or as approved by the Director. (e) Black bears, cougars, bobcats, wolves, raccoons, and skunks held on a Wildlife Holding Permit cannot be bred, reproduced, or propagated in Oregon, including grandfathered animals. (f) Black bears, cougars, bobcats, wolves, raccoons and skunks may only be transferred between valid Wildlife Holding or Wolf Holding permittees with prior approval by the Director. (g) Black bears, cougars, bobcats, wolves, raccoons and skunks must be held within facilities approved by the Department, except when: (A) transported to or from licensed Oregon veterinary clinics or other ODFW-approved facilities; (B) or on public display by a USDA class A, B or C license holder. (h) Application renewals must include a description of permanent animal identification mark and mark location, and veterinary documentation of reproductive sterilization if required. (A) No access or contact shall occur between wild animals and captive black bear, cougar, bobcats, wolves, raccoons and skunks or other wildlife held on a Wildlife Holding Permit. (4) The burden of proof of the hybridity of a bobcat-cross or wolf-cross animal is the responsibility of the animal owner. A wolf is considered "pure-bred" when the animal's genetic and phenotypic makeup does not include any genetic material or characteristics of a domestic dog or other canine, resulting in a hybrid. Documentation in the form of breeding evidence by pedigree and record, records of acquisition and disposition, transactions, and sworn statements, will be required of all bobcats and wolves claimed to be hybrids and genetic testing may be conducted by the Department. Lack of sufficient proof of hybridity as determined by the Department will genetically classify the animal as a bobcat or wolf requiring a Wildlife Holding Permit or Wolf Holding Permit and regulation under the conditions of these rules. [(3) For the purpose of this rule, a wolf is considered "pure-bred" so long as it does not include any hybrid cross with a domestic dog or other canine. The Department will determine pure-bred status based on written documentation that may include breeding records, records of acquisition and disposition transactions and sworn statements.]

ODFW DRAFT Revised Rules Chapter 635 - Division 44 January 2016 page 13 of 24

(5) Raccoons and Skunks (a) Two or more held raccoons or skunks of different sexes requires sterilization of either sex to prevent propagation prior to sexual maturity and within (30) days of permit issuance for adult animals with documented certification by a licensed veterinarian. As there are no breeders for skunks as domestic captive-bred pets permitted in the state of Oregon, all skunks legally obtained as domestic captive-bred house pets will come under the requirement for sterilization to prevent propagation. When said domestic captive-bred pet skunk reaches the age at which it is physically safe

to surgically alter the animal by spay or neuter, Oregon owners of domestic captive-bred pet skunks must have the pet skunk spayed or neutered and be able to provide veterinary verification of the alteration upon request by representatives of the Oregon Fish and Wildlife Division. (b) Held raccoons and skunks must be caged or restrained when transported beyond the permitted facility. (6) [Holding Pure-Bred] Gray Wolf or Wolves in Captivity [635-044-0051] [This rule governs the holding in captivity of pure-bred wolves in Oregon, with the objective of protecting the public's native wildlife.] (a) The Department will only issue new permits to hold a pure-bred wolf in captivity to AZA accredited facilities and no new animals may be added to grandfathered collections without approval by the Director. (b) To maintain the authority to hold one or more pure-bred gray wolves in captivity, a person described in 635-044-0025 (2) must: (A) No later than 30 days before the expiration date printed on the permit issued by the Department [or the Department of Agriculture which authorized the person to keep one or more wolves in captivity]: (I) Apply to the Department for an annual [captive] Wolf Holding Permit [using a form provided by the Department. Such permits will have a term of two years and may] that may include [, but are not limited to,] conditions designed to protect native wildlife and human safety; (II) Remit to[Pay] the Department a fee of \$100 (plus a \$2.00 license agent fee) for the permit or permit renewal; and (III) Demonstrate [certify] to the Department that the person's wolf handling facility complies with any applicable city or county ordinances and any applicable federal laws. (c) Current holders of captive wolves must: (A) Not import, export, purchase, sell or exchange any pure-bred gray wolf except with written authorization from the Department prior to transferring a pure-bred gray wolf to another facility[or releasing any pure-bred gray wolf into the wild] ; and (B) Comply with the terms of any permit issued by the Department. (d)The permit holder must provide a copy of their current federal permits to the department with their Wildlife Holding Permit application or renewal. [(5) Notwithstanding subparagraph (4)(a) above, a person who qualifies to hold a pure-bred gray wolf under paragraph (1) through possessing an exhibitor permit from the U.S. Department of Agriculture does not need

ODFW DRAFT Revised Rules Chapter 635 - Division 44 January 2016 page 14 of 24

to obtain a wolf holding permit from the Department so long as the person maintains the person's federal permit. However, the person must still comply with the requirements of subparagraphs (4)(b) and (c). (6) The Department may revoke a wolf holding permit if the Department determines that the person has violated these rules or the terms of the permit. If the Department proposes to revoke a person's wolf holding permit, the person may request a contested case hearing within 14 days of notice of the proposal.] Stat. Auth.: ORS 498.002, 497.228, 496.171 - 182 Stats. Implemented: ORS 498.002, 497.228, 496.171 - 182

635-044-0025 Grandfathering the Possession of Black Bear, Cougar, Bobcat, Wolf, Raccoon, Skunk, Squirrel, Chipmunk and Other Legally Held Non-game Wildlife Species (1) A person who legally possessed native wildlife (black bear, cougar, bobcat, wolf, raccoon, skunk, squirrel, chipmunk) or other legally held species prior to the time the Commission adopts the amended rules may continue to hold said animal(s) for the remainder of the animal(s) life provided: (a) The holder submits an application for an annual Holding Permit (Wildlife or Wolf), pays the associated fees, and secures a Holding Permit within a one year of the adoption of these amended rules. (b) Grandfathered animals are held in Department approved facilities meeting standards defined in the Oregon Enclosure and Caging

Standards for Holding Wildlife (Exhibit 1). The facilities housing legally acquired Grandfathered Black Bear, Cougar, Bobcat, Wolves, Raccoon, Skunk, Squirrel, Chipmunk and Other Legally Held Non-game Species, must meet the minimum facility standards defined herein within one year following the adoption of these rules. (c) Grandfathered bears, cougars, bobcats, wolves, raccoons, skunks, squirrels, and chipmunks must have been acquired from a legally propagated out-of-state source or legally acquired with approved documentation that may include a valid sales receipt, Certificate of Veterinary Inspection with import permit from Department of Agriculture, valid agency transfer of ownership permit identifying the animal was propagated and born in legal captivity, or as approved by the Director. A signed and notarized affidavit stating the grandfathered animal (s) were legally acquired and held in compliance with these rules will be required of all permit holders of grandfathered animals. Domestic captive-bred skunks, legally acquired and imported from licensed breeders, will not require a signed and notarized affidavit. A sales receipt for each legally acquired animal with the license number of the breeder included will be required. (d) Grandfathered animals may not be bred. Two or more held grandfathered animals of the same species of different sexes requires sterilization of either sex to prevent propagation prior to sexual maturity and within (30) days of permit issuance with documented certification by a licensed veterinarian.

Should the Oregon Fish and Wildlife Division reject our request to remove domestic captive-bred pet skunks from the proposed ban, we respectfully request the domestic captive-bred skunks currently owned as house pets to be grandfathered under the current regulations in the State of Oregon that permit the keeping of domestic captive-bred skunks as pets, without fear of confiscation and the ultimate demise of our domestic captive-bred pet skunks.

Domestic captive-bred skunks owned as house pets would be exempt from proposed outdoor caging regulations, lip tattoos and RFIDs. Outdoor caging of house pets that are accustomed to indoor accommodations would expose said domestic captive-bred skunks to extreme weather conditions detrimental to their health and well-being. Outdoor caging would also expose these domestic captive-bred house pets to exposure to predators and diseases from wildlife from which they are shielded while living indoors.

ODFW DRAFT Revised Rules Chapter 635 - Division 44 January 2016 page 15 of 24

(2) The only person(s) who may hold pure-bred wolves in captivity are those who, as of December 31, 2009, held a gray wolf or wolves in captivity under previous Oregon Department of Agriculture, Class I Exotic Canine, Exotic Animal Division 603 Rules or held a valid license or registration from the U.S. Department of Agriculture, under the federal Animal Welfare Act of 1970. These persons may hold only gray wolves, and only if they obtain authority under the requirements of 635-044-0020(6) [paragraphs (4) or (5)] of this rule. (3) Grandfathered black bears, cougars, bobcats, wolves, raccoons, and skunks may only be transferred from the original Wildlife or Wolf Holding Permit to an AZA accredited facility or as approved by the Director. [(2) Beyond the persons described in paragraph (1), the Department will not issue any new permits to hold a pure-bred wolf in captivity.] Stat. Auth.: ORS 498.002, 496.171 - 182 Stats. Implemented: ORS 498.002, 496.171 - 182

635-044-0030 Holding of Nongame Wildlife 1) Native nongame wildlife or their parts or products may not be sold or live animals propagated. Only nongame species from the following list are permitted to be

address by the permittee. (5) The addition of animals of the species approved on the original permit requires prior approval by the local department biologist. (6) Except as directed in 635-044-0025 (3), wildlife held on a Wildlife Holding Permit may only be transferred to another Wildlife Holding Permittee and requires: (a) the species transferred is listed on the receiving permittee's Wildlife Holding Permit, and; (b) a new application and updated Wildlife Holding Permit and payment of associated fees for the addition of animals of the species transferred, and; (c) approval by the Director. (7) Failure to renew a Wildlife Holding Permit by December 31 of the year issued may result in a penalty or confiscation of held species, fines, and denial of a future permit. (8) The Department may revoke or decline to renew a Wildlife Holding Permit if the permittee is convicted of, or admits to a violation of any wildlife law or any rule, order or permit issued under the wildlife laws within the previous 5 years of the date of application. Upon revocation or nonrenewal of a permit, the Department will confiscate any birds, mammals, amphibians and reptiles held. (9) Cancellation or non-renewal of application, licenses, or permits and contested case procedure is defined in 635-044-0075. Stat. Auth.: ORS 496.012, 496.138, 496.146, 497.298, 497.308, 497.312, 497.318, 498.022, 498.029, 498.052, 498.222 & 498.242 Stats. Implemented: ORS 496.012, 496.138, 496.146, 497.298, 497.308, 497.312, 497.318, 498.022, 498.029, 498.052, 498.222 & 498.242

635-044-0040 [635-044-035] Requirements for Care of Wildlife Held in Captivity: Wildlife held in captivity under any permit, license, or condition listed in 635-044-0020 and 635-0440030 or under a Wildlife Propagation license must be:

ODFW DRAFT Revised Rules Chapter 635 - Division 44 January 2016 page 18 of 24

(1) Provided minimum care sufficient to preserve the health and well-being of the held animal (except for emergencies or circumstances beyond the reasonable control of the holder), includes, but is not limited to, the following requirements: (a) Appropriate food for each held species of sufficient quantity and quality to allow for normal growth or maintenance of body weight. (b) Open or adequate access to potable water in sufficient quantity and quality to satisfy the animal's needs. (c) Shelter sufficient to protect from adverse elements, protect from predators, to prevent escape, and injury. Any other requirement particular to the survival of the animal shall also be provided. (d) Veterinary care deemed necessary by a reasonably prudent person to relieve distress from injury, neglect or disease. (e) Continuous access to an area: (A) With adequate space for exercise necessary for the health of the animal; (B) With air temperature suitable for the species of animal; and (C) Shall be cleaned and kept free from excess food or fecal waste or other contaminants which could affect the health of the animal.

Owners of legally obtained domestic captive-bred pet skunks, having knowledge of the dietary and supplemental needs of said domestic captive-bred skunk, will be responsible for the well-being and health of said skunk. Owners of domestic captive-bred skunks, knowing their need for special dietary needs to maintain bone health, oral health and overall well-being, are required to provide said skunk(s) with all necessary care, food, potable water and vitamin supplements. Owners of domestic captive-bred pet skunks will be required to provide professional veterinary care for each domestic captive-bred pet skunk in possession.

(f) Captive wildlife may not be restrained with a chain or rope or hobbles or similar restraint method. (2) It is unlawful for any person possessing wildlife in their care and possession to cause or allow such wildlife to be chased, injured, harmed, harassed, or neglected. (a) Wildlife held on a Wildlife Holding Permit may not be harvested as a game species, used in hunting, fur

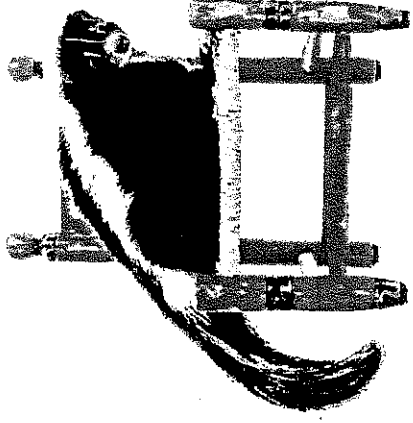
Department and must have a certificate of veterinary inspection and any import permit or license required by the receiving state. Stat. Auth.: ORS 496.012, 496.138, 496.146, 497.298, 497.308, 497.312, 497.318, 498.022, 498.029, 498.052, 498.222 & 498.242 Stats. Implemented: ORS 496.012, 496.138, 496.146, 497.298, 497.308, 497.312, 497.318, 498.022, 498.029, 498.052, 498.222 & 498.242

635-044-0075 [635-044-0125] Cancellation and Non-Renewal of Wildlife Propagation License or Wildlife Holding or Wolf Holding Permit (1) Failure to comply with any [shipping] requirements [reporting requirements, or requirements for care of wildlife held for sale] within these rules or conditions of authorization is cause to cancel or deny renewal of the Wildlife Propagation License, Wildlife Holding Permit, or Wolf Holding Permit and confiscate or require disposal of the wildlife being held. A person may appeal cancellation or denial of a license or permit through a contested case hearing. The request for a contested case hearing on a proposed cancellation must be received by the Department within 21 days after service of notice (or 90 days for emergency revocations). The request for hearing on a proposed non-renewal must be received by the Department within 60 days of notice. Final Orders in contested case hearings will be issued by the Director. Stat. Auth.: ORS 496.012, 496.138, 496.146, 497.298, 497.308, 497.312, 497.318, 498.022, 498.029, 498.052, 498.222 & 498.242, 183.430, 183.470, 183.484, 183.700 Stats. Implemented: ORS 496.012, 496.138, 496.146, 497.298, 497.308, 497.312, 497.318, 498.022, 498.029, 498.052, 498.222 & 498.242

The exception to the above proposal would be domestic captive-bred and raised skunks to be sold as pets. Oregon residents who own or wish to own a skunk as a house pet must follow the proper procedures set forth to obtain and keep said skunk or skunks as house pets. Oregon does not allow licensing of skunk breeders within the state. All skunks purchased for the purchase of becoming house pets must be imported from a state allowing the licensing of domestic captive-bred skunk breeders. All breeders must provide their license number for breeding skunks for their respective state to the purchaser of every skunk sold as a pet. Domestic captive-bred skunk breeders must also certify the domestic captive-bred and sold skunk has been surgically altered to have their scent glands removed prior to sale to residents of Oregon. Oregon residents will be required to purchase a propagator's permit for their pet skunks from the Oregon Division of Wildlife. This permit will be offered for a nominal fee. One permit will be all inclusive of the animals owned and kept on owner's premises. This permit must be renewed annually by the domestic captive-bred skunk owner. Oregon Fish and Wildlife Division reserves the right, with prior notification, inspect the home at the address of record of any domestic captive-bred skunk to verify the well-being of said animal and certify said animal is still in possession of the owner of the permit. Permits for domestic captive-bred pet skunks will be renewed annually by the Oregon Fish and Wildlife Division without prejudice when permits are properly applied for on a timely basis. Owners of domestic captive-bred pet skunks will report all said animals on the annual permit application. Annual renewal of propagator permit for domestic captive-bred pet skunks are a contract between OFWD and owner agreeing to a home inspection by OFWD with prior notification by OFWD.

635-044-0080 Disposition of wildlife upon license suspension, revocation, nonrenewal or denial (1) Within 90 days after any of the following events, any person holding wildlife with a Wildlife Holding Permit, Wolf Holding Permit, or Wildlife Propagation License must dispose of the animals: (a)

MIRABELLA



DIARIES



I am Mirabella. Mom calls
me her little "skunklet".

My birthday is May 1st. I was

born in 2008 at a licensed

USDA Breeder in Pennsylvania.

I am small for an adult skunk.

I weigh 7 ½ pounds.

When I was a baby, Mom liked

to carry me around in a t-shirt

pouch everywhere she went.

For 3 months she "imprinted"

me like a kangaroo mom.

I can clean myself. Mom does not have to

bathe me. I can use a cat box or a diaper

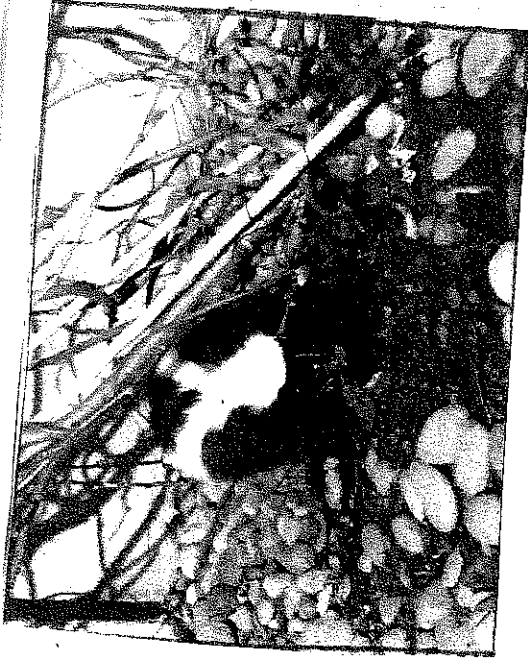
pad. I am easier to travel with than the

cat or dog. I am quiet and will eat your

leftovers. I am very good. I don't have

accidents in the house like the puppy.

I also don't chew things up like he does.



For exercise we go on walks and
I get to wear my halter and leash.
Mom also lets me run around in
our fenced yard. I like to chase my
mom. If mom walks me in public,
the paparazzi come to take my
picture with their cell phones.

I like to help Mom weed the garden.
I help get rid of bugs, too.

My favorite food is cottage cheese. I hate lima beans and Brussel sprouts. Mom feeds me a special skunk diet. I eat skunk chow, and a little ferret and insectivore dry food. She gives me treats consisting of fruit or vegetables.





I have hair, rather than fur. I
am so soft. Most people who
are allergic to cats and dogs
aren't allergic to me. Mom
likes to cuddle with me and
give me lots of kisses.

Mom recently adopted a black and
White Kitten sister for me to play
with. Her name is "Theodora".
She has a white stripe down Her
nose just like me. We are best
friends. We take naps together,
play chase, and share our toys.





I also have a big brother cat named
"Tio", and a puppy brother named
"Chumlee".



I sleep on Mom's bed at night with

Theodora. During the day I sleep

and build "forts" to hang out in.

I like to build things with Mom's

shoes and my stuffed play skunks.

I also like to hide Mom's shoes.

If Mom can't find something it is

in my fort or under the bed.

I talk to mom whenever I have some-

thing important to say. I make what Mom

calls "cricket" sounds to call Mom. When

someone tries to eat my food I make a

sound that Mom says sounds like a

"needle on a record" or a car trying to

start up. This means stay away. For extra

drama, I may stamp my feet.

I have participated in two skunk
festivals. Running is my best
event. Mom entered me in a beauty
pageant which was embarrassing
because everyone looked at me.
I refused to dress for the costume
contest.



If stair climbing were an event,
I would win.

Recently I broke a leg. Mom drove to the vet School at Oregon State University to help me. I am healed now and eat a "Tums," and a vitamin D chewy, and bathe under a UV reptile light a few times a week.



Goodnight.

This is my Mirabella story. I hope you
have gotten to know me a little bit better.
Thank you for letting me tell you my story.



The end.