

Exhibit A

**Public Correspondence received as of
May 26, 2016**

Roxann B Borisch

From: Colin Gillin <colin.m.gillin@state.or.us>
Sent: Friday, March 18, 2016 2:03 PM
To: Carol Turner; Kevin Blakely; Roxann B Borisch
Subject: Fwd: Testimony Regarding 635-044-0000

Sent from my Verizon Wireless 4G LTE smartphone

----- Original message -----

From: Charlotte Clawson <clawsonkennels@gmail.com>
Date: 3/18/2016 12:46 (GMT-08:00)
To: colin.m.gillin@state.or.us
Subject: Testimony Regarding 635-044-0000

To Whom it May Concern-

It has come to my understanding that in the proposed piece of legislation concerning Protected Wildlife, Holding and Propogating Rules there is a section that refers to wolfdogs/wolf hybrids. Within section 4, it is stated that

"The burden of proof of the hybridity of a bobcat-cross or a 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 teh 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."

As a voting constituent of Oregon, a former wolfdog rescuer, and a current member of the national Florida Lupine Association organization, I find this portion of the bill very concerning.

High content wolfdogs *should* be phenotypically indistinguishable from wolves. This is part of their definition. In addition to this, there have been numerous examples of Government entities attempting to enforce the law by phenotype without success, and with a great cost to both animals and owners.

The most recent example is that of Karma, the Orange County husky declared as a wolfdog by the Animal Control officers that seized her due the owner's arrest. The original owners had evidence of Karma being a purebred Siberian Husky going back seven generations, but Orange County still elected to reference the UC Davis test results.

UC Davis testing found the *possibility* of wolf in Karma's lineage 2-3 generations back. For this, Karma was the center of a long and protracted debate, and her life would not have been spared if not for Supervisor Todd Spitzer's tireless efforts to find a compromise. This was an almost 4 month conflict with a very real financial

cost that led to Karma's placement at Full Moon Farm sanctuary in North Carolina. The burden of caring for this animal for the rest of its life as well as finding a solution was placed on the **public** because of a single genetic test. The results of which were given with a cautionary statement that any dog of any mix or purebred can have up to .09 Wolf genetic makeup. Karma tested at .15, which is not unusual for Nordic Breeds.

As per the FLA, "The only sure way to accurately determine if an animal is a wolf, wolfdog, or dog through genetic testing is to examine both mtDNA and nDNA markers—and possibly even Y chromosomal markers in males, because the Y chromosome is inherited paternally and is consistent along the patriarchal line just as mtDNA is to the matriarchal line."

Therefore, the only record that should be required of owners is a genetic test performed at the Department's expense so as to prevent imposition of an undue burden on the owners. As per the UC Davis test, "dogs and wolves share most alleles in the markers used for this test. Wolf-specific alleles in our marker panel are also infrequent in wolves such that not all wolves possess these alleles. Although our test is powerful to detect hybridization, absence of wolf-specific alleles is not a guarantee that there is no wolf ancestry." It could therefore be argued that with such a close margin of error in animals that are mostly dog, a genetic test may not be 100% accurate in animals that are mostly wolf. In fact, UC Davis states that the genotype received is compared with a database for Alaskan Husky, Inuit Dog, German Shepherds and North American Wolves. This excludes hundreds of dog breeds that may be within the genotype for the tested animal.

This test only confirms the **likelihood** that the subject animal is a dog, wolf or hybrid.

Given the wording in 635-044-0000, seizure of Oregon resident's pets will be based off of a likelihood that excludes several populations of dog breeds that could preserve the life of the animal being tested.

Please reconsider the wording in this bill.

If the purpose of this bill is to preserve wild populations genotype in the interest of conservation, domestic dogs that are unaltered or the coyotes present a larger concern than a private resident's pet kept properly contained.

If the animal is not being properly contained, then the local Animal Control statutes should be enforced.

If the concern is private individuals acquiring animals from the wild for breeding purposes, we have existing laws to prevent this that can be enforced.

Section 4 of this bill is a gross overreach of the bill's original scope with very real impacts for private owners. Please consider removing it or re-wording it to address where the burden of proof lies (with the accuser, not the accused private owner) and seriously think about how iron-clad this 'proof' would be.

Thank you for your time,
Charlotte Sause

ODFW WildlifeInfo

From: Roland Sonnenburg <roland@talentedanimals.com>
Sent: Wednesday, March 23, 2016 11:50 AM
To: odfw.wildlifeinfo@state.or.us
Subject: Proposed Revisions to Section 44

Hello,

Can you please forward this email to the commissioners as soon as possible and not wait till June—I am suggesting some time sensitive solutions that we will need to act upon... Thanks!

Dear Chair Finley and members of the Commission,

Thank you very much for taking the time on Friday March 18 to listen to public testimony on the proposed revisions to Section 44. After listening to the testimony and responses, and speaking with some of the committee members, there several points that I feel need to be clarified:

1. These revisions are not about increasing standards of care or animal welfare—they are about one thing: **eliminating all private keeping of native animals in Oregon.** They will, within 10 years, drive many businesses out of state or out of existence, will have a huge negative impact on the Oregon economy, and will eliminate the keeping of these animals. Hundreds of law-abiding citizens will no longer be able to share their homes with the animals they love. Nobody who is not AZA can replace any animals.
2. Animal owners were **not** represented in this process. Allowing a few 3 minute testimonials is not the same thing as having an **equal** number of animal owners on the advisory committee as you have animal detractors. There were 23 people involved in the committee, and not **one single real stakeholder.** In fact, none of us were even informed until the process was largely complete, and had we not gotten wind these revisions would have passed without any discussion. Virtually **all** of the feedback you have received has been negative, except for from the zoo who is exempt from these rules, because these revisions are deeply problematic to anyone who keeps animals.
3. These revisions **will** result in many private owners having to kill any animals they possess over the arbitrary number limits. There is no reason for number limits on grandfathered animals. It makes no sense—these animals are already there, being cared for and causing no problems, and will soon be dead and unreplaceable, why add a limit that will do nothing other than require people to kill their pets?
4. Placing the burden on owners to prove that their animal is not pure is unreasonable. Dr. Gillan testified that trying to prove heritage was too expensive and inaccurate for the state, so instead he proposes that private citizens bear this burden. Presumptive innocence is a cornerstone of our legal system. Under these revisions, any owner of any dog could be accused of having a pure wolf, and would somehow need to prove that Fido was actually a mutt...
5. The transport rules are impossibly restrictive. Animal owners will no longer be able to take their animals to work in film, to schools or educational fairs, or other projects that are good for the animals and the state.
6. Exempting some facilities based on their accreditation by a private organization is unconscionable. Let me be clear—we are not talking about caging or care requirements, we are talking about an association of zoos, and no private citizen can become accredited. The state should not provide an unfair business advantage to one group of facilities based upon that group's rules. If you have an exemption, it should be for USDA licensees—people who already meet federal government standards. This would at least allow Wildlife Images, West Coast Game, Walk on the Wild Side, Talented Animals, and other world class institutions to continue.

7. AZA caging standards are designed for animals who spend their lives in the cages. The animals we are discussing do not.
8. Virtually unlimited inspections and inspection fees—according to these regulations, any time ODFW has the urge, they can go inspect a facility and then bill that facility \$150. This would almost certainly lead to lawsuits and not be upheld in court.
9. Skunks are **not** qualitatively different from the other animals being discussed. These are **all** beloved pets, just because they are not the species you prefer to have in your home does not mean that someone else does not love them.
10. These rules are perhaps reasonable with regards to wildlife, but we are not talking about wildlife. We are talking about cherished, beloved pets, born and raised in our homes, sharing long, happy, healthy lives with humans who cater to their every need and whim. We are talking about animals who have never been in the wild and have no impact upon the wild.
11. Biologists and naturalists are raised on the notion that nature and wildlife should be admired but untouched. That the only good life for an animal is in the wild. This is not a truth—it is an arbitrary assumption with which many of us disagree. This assumption colors and pervades these revisions—why make rules to allow people to continue keeping animals if you do not believe animals should be kept? If you want to make fair and effective regulations, you will need to be willing to reconsider and earnestly discuss these fundamental beliefs.

There is no possible way your current advisory committee can fix these revisions without the participation of knowledgeable, experienced thoughtful stakeholders. We will simply be right back again in June, voicing the same concerns.

If the only acceptable outcome for ODFW is to eliminate private native animal ownership, it is hard to see how we find common ground, but, at the very least, we need to sit down together and actually walk through the details in a far more precise manner than is possible in a brief committee meeting—there must be authentic balance and compromise or there is no real hope for progress. As I said on Friday, I would be happy to work with my colleagues and put together a list of several people that would be able to represent our issues and concerns, and have those people come in to work with the committee to try to have a viable set of rules by June.

Warmly,

Roland Sonnenburg
Talented Animals

To Curt Melcher
4034 Fairview Industrial Drive SE
Salem, OR 97302
ODFW Director



Hello,

My name is Richard Ritchey of Colton Oregon, and would like to address the following issues concerning new rules to be adopted in the near future concerning both indigenous, and exotic wildlife in our state, and I would like to first state my background in this industry and hobby.

Professional Herpetologist with a gross income of \$107,000 a year.
525 public wildlife presentations with educational emphasis on invasive species. Since 1991 to current date.
Taxidermist since 1978
Developer of surgical techniques in 1988 relating to herpetology that are taught to Veterinarians.
Successfully propagated over 60 various species of venomous, and non-venomous reptiles.
Provide live reptiles for the movie industry, zoos, and educators world wide.
Hold yearly clinics for Rattlesnake aversion training for hunting dog for the past 10 years.
Receive wildlife under permit to hold, relocate out of the state, or euthanize invasive and prohibited species.
Taught venomous reptile handling procedures for ODFW Biologists.

The following four stated purposes are to be addressed.

DIVISION 44

PROTECTED WILDLIFE, HOLDING, AND PROPAGATING RULES

635-044-0000

The purpose of these rules is to:

- 1-Identify the species of wildlife that are protected.
- 2-Wildlife that may be held.
- 3-Conditions for holding.
- 4-Regulate the propagation of wildlife.

1- The identifying of wildlife to be protected is imperative as long as long as provisions are made for responsible citizens in the private sector with knowledge, resources, and the desire to propagate protected wildlife. There is an undisputed fact about the private sector in the USA concerning knowledge gained about species captive requirements, and breeding behaviors. The private sector is unmatched in scientific discoveries concerning such discoveries. Crude maybe in some ways, but none the less highly utilized by professional zoos and institutions world wide.

2- No concerns over what wildlife may be held as long as provisions are made for responsible citizens.

3- Conditions for holding should only be applied to the one industry of the trade that has a first desire for profit over animal security and health, and that is the pet industry. The private industry has an immeasurable small percentage of individuals who do not care properly for said wildlife, and thus should have no bearing in rule making for the entire industry.

4- To "regulate the propagation of wildlife" can have wildly differing connotations, thus I find it difficult to respond to. Regulate means to either increase or decrease through complication or simplicity of rule. I can only assume from an agency that restricts that this means the proposed rules are intended to decrease the number of wildlife propagated in the state of Oregon. I know that resources, funding, and time is in short supply for regulating agencies that would prefer to place simple outright bans or restrictions upon the wildlife of our world, but what I, and future generations will find to be true, and of great damage to the natural world is this:

Humanity, is a hierarchal being of this planet, and is the sole individual responsible for the care of this world . Care, being the key word that propels an individual, group, or nation to actively protect, support, promote, and fund such beauty before our senses of touch, sight, smell, and sound. Care, love, compassion, and the willingness to give of time, energy, and money directly derives from ones experiences in life, that is to say, that which meets each persons senses. The key to conservation through love, compassion, effort, and funds has been, and always will be, to expose that which we wish to conserve to the senses of humanity to our fullest extent. If we make the deadly mistake of withholding the wildlife and environment of this world from the eyes, skin, and ears, that are specifically meant for humanity to experience, then said wildlife will eventually be removed from the Earth as well. Restrictive legislation will eventually lead to destruction of the natural world via fear, and hatred brought about through those who have never intimately seen, heard, or touched the natural world.

Please do not let a immeasurable fraction of irresponsible citizens dictate rules over the majority of responsible caring citizens who wish to participate in ways that now, may seem irrelevant, but in the future, can be a great contributor to the preservation of our wildlife and environment.

Thank you,

Richard Ritchey
Herpetologist

DIV 44

Jerry C. Ray
800 N.W. meadow View
Corvallis, Oregon 97330
541-745-7311

Mr. Kevin Blakely
ODFW
4034 Fair View Industrial Dr. S.E.
Salem, Oregon 97302

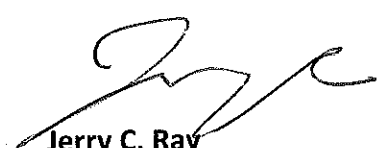
March 25, 2016

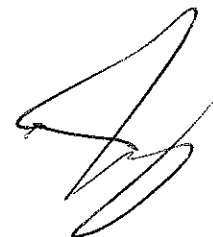
Dear Kevin,

At the commission meeting Friday, March 18, 2016, after the meeting you and I spoke briefly. I said I was going to communicate with the commission concerning the rule change of Division 44. Please find attached a letter I sent to Chairman Mr. Finley.

Please feel free to contact me if you have any comments.

Sincerely,


Jerry C. Ray



**Jerry C. Ray
800 N.W. Meadow View
Corvallis, Oregon 97330
541-745-7311**

**Mr. Michael Finley
ODFW Commission Chairman
1521 Nottingham Circle
Medford, Oregon 97504**

March 22, 2016

Dear Chairman Finley,

It was my privilege and pleasure to be invited to participate and serve on a very successful rules change committee in 2011. This committee was "Division 46, Use of Wildlife in Competitive Dog Trials and The Training of Hunting Dogs and Raptors."

I attended the last half of your commission meeting Friday, March 18, 2016. My particular interest was the last agenda, "Division 44 rule change." At the end of the session Friday, you encouraged additional comments.

With that as a background, I make the following observations, comments and suggestions:

- (1) Based on the number of people who spoke in the "public testimony" portion of Rule change for Division 44 and the diversity of stakeholders effected by this rule change, it was very evident that the committee who addressed the rule change issue was poorly assembled. They did not invite relevant stakeholders such as houndsmen, skunk owners, teaching institutions, private propagators, rehabilitation facilities and others.**
- (2) Nowhere in documentation or oral presentation did I see or hear a specific reason for requesting this rule change. If the reason for change was not driven by Oregon scientific proof of concerns about controlling disease, influx of invasive species, overpopulation of non-native species, or any other issue that endangers the well-being of Oregon wildlife, this exercise of rule change ought to be terminated.**
- (3) However, if the commission deems it necessary to continue revision of this rule, I request that a new committee be formed, and that all possible stakeholders be represented in the committee.**

(4) If enforcement of existing rules is the problem, I comment that changing the current permit system and eliminating legal stakeholders is an unacceptable solution.

I greatly appreciate the opportunity to communicate with you and the commission concerning this rule change. If you have any comments or concerns about my comments, please feel free to contact me at 541-745-7311 or e-mail at ardenr@proaxis.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Jerry C. Ray". The signature is fluid and cursive, with a large initial "J" and "R".

Jerry C. Ray

CC Kevin Blakely, ODFW

Roxann B Borisch

Subject: FW: proposed listing of snake in a protected status

From: Richard F. Hoyer [<mailto:charinabottae@earthlink.net>]

Sent: Thursday, March 24, 2016 7:29 PM

To: Colin Gillin; Richard F. Hoyer

Subject: Re: proposed listing of snake in a protected status

Colin,

Below, I have copied sections of the revised Div. 44 regulation. I urge you place yourself in the shoes of a citizen scientist or professional wishing to conduct research, a secondary science teacher or elementary teacher, a field herper, or any member of the public maintaining any non-game species and grasp what would be required of those individuals as specified by these regulations. My situation applies to all of the above categories except the professional category so have the capacity to relate to the negative outcomes of the proposed regulations.

Before retiring in late 1991, I was a secondary school science teacher. During my teaching years, with the conditions specified in these proposed regulations, every year I would have been in violation of several provisions. And had those regulations been in place, they would have prevented me from exposing my students to a variety of learning experiences dealing with non-game species. I urge you analyze these regulation step by step in order to grasp the very serious, unintended consequences.

Consider the following: ODFW either does not have, or likely will not allocate funds toward assessing the populations of non-game species nor conduct any basic life history studies of such species. (The Washington Ground Squirrel is one exception.) Hence, as I discovered, ODFW relied on the ORBIC / NatureServe rankings which is not a legitimated science-based process. I am deeply upsets me that no one at ODFW either understand what does, and does not constituted sound science, never bothered to check out the NatureServe process, or don't really care it that process in not legitimate science.

So here are a couple of questions to ponder.

- 1) Is it ODFW's policy to encourage and foster professionals and citizen scientists to undertake studies of non-game species?
- 2) Is it ODFW's policy or wish to have the public connect with, be educated about, and understand the value of non-game species?
- 3) Conversely, is it ODFW's policy to discourage and suppress studies of non-game species?
- 4) Is it ODFW's policy to discourage pubic involvement with non-game species?

I should be abundantly clear, as it is to me, that these regulations do not facilitate either 1 or 2 but in fact have the unintended consequences of producing the outcomes of 3 and 4. That is why when we met on March 3rd., I mentioned that these regulations were punitive and mean spirited. If you and others at ODFW do not understand that point, then you simply have lost any connection with the public you are suppose serve.

As a serious hobby, I have been acquiring information, and learning about life history aspects of Rubber Boa for over 50 years. As written, these regulations will terminate my involvement with the species.

So that you may understand, let me go through some of my processes and reveal some of what I have learned. When I travel to a site and find a number of Rubber Boas, I record the precise spot they were found, bring them home, then take weights, and total and tail length measurements. I then sort through my files for that particular site and determine if the boas are new captures or recaptures. Years ago, I devised a naturally tagging method that allows me to identify individual boas one from another. I then take them back and release them where found. This process usually takes a few days but sometimes longer depending on weather conditions and on how far I need to travel.

So far this year, I have encountered 24 boas during only 4 trips to the field, all being recaptures, some having been initially captured over 10 years ago. Most have been recaptured a number of times over the years. At one of my sites, there is a female boa I initially captured in 1991 and I have recaptured off and on including last year, 24 years after her initial capture. I am hoping to find her this year. But if these regulations are adopted, to do so thereafter would be illegal.

This is why I invited you to accompany me in the field to see what is involved. Over the years, I have recorded information on longevity, fidelity to home territory, growth rates at different ages, total growth over time, differences between the sexes, emergence patterns, reproduction, prey base, and other aspects of the species' life history attributes. I have published five papers on the boa and I hope to accomplish more of the same in the future.

One of the life history aspects I discovered and published about the Rubber Boa is that this species is a specialist in that it is a 'nest robber' with the boa's principle prey being nestling small mammals. Also, information I have recorded not only originates from field efforts but from captive specimens as well. Much of the information I have reported on reproduction has come from females captured and retained. This has required retaining gravid females for up to 5 months or more before they produced a litter and then released those females and their neonates where the female was found. I have recaptured a large number of such females over time and have recorded information on additional litters from such females.

In order to feed captive boas, besides having lab colonies of mice, in the spring and fall I have often gone out and captured native prey species. So I have gone out and collected nestling small mammals of various species. Now look at current regulations as worded. Keep in mind, that when I go out, I have no way of knowing ahead of time if I will find any nests containing prey species or what species I may encounter.

Let's say I get lucky and find nests containing young of the Grey-tailed Vole, Townsend Vole, Creeping Vole, Vagrant Shrew, and Deer Mice --- all of which are common and can be found out at E. E. Wilson. But I could possibly encounter nests containing a number of other species of small mammals that occur out at E. E. Wilson. If I happened to make searches elsewhere, there is a large list of other species of small mammals I might encounter. As the regulations are now written, ahead of time I would be required to apply for, be granted approval, and pay a fee for each species of small mammal I would encounter and retain for boa food. The boa also eats lizards of which three are common locally. To collect any of these species without such permits would also be illegal.

That brings me to additional questions. What rational explanation could there possibly be for limiting taking / maintaining just two of any species and per household? Where did the number 'two' come from? Remember, we are dealing with non-game species that by the very definition, have little to no demand. And by applying basic biologist principles, such species invariably will have larger numerical populations than all or almost all game

species. So what possibly could be the logic of restricting a person / household to two specimens of any such non-game species?

Then, what possibly could be the rational for not holding protected species? Does anyone at ODFW really believe that holding such species has conservation consequences, will produce negative impacts, and does the species harm? Should anyone come across the 4 species of snake currently in a protected status, to even pick them up makes a person a law breaker. Can you rationally explain why picking up one of those species of snakes should be illegal?

What possibly rational could there possibly be for not releasing specimens being held beyond 48 hours? And what is the rational for placing a species in a protected status whose populations numbers in the millions? The Rubber Boa is a prime example.

In the above, I have only touched upon very few of the negative consequences that will occur in the proposed regulations should they be adopted. If you examine the specifics of the 'grandfather clause', they likely will be devastating and prohibitively expensive to anyone now maintaining non-game species including myself.

With perhaps a few exceptions in these regulations, besides being overly restrictive, punitive, and mean spirited, these proposed regulations have zero conservation value for any of the species mentioned therein. I would challenge any ODFW biologist to produce rational justification that would support any conservation value to these regulations.

Again, I invite you to accompany me in the field any time you are free. In fact, I wish I could take all Commissioner out as well.

Richard F. Hoyer (Fisheries and Wildlife, OSU, '55')

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DIVISION 44
PROTECTED WILDLIFE, HOLDING, AND PROPAGATING RULES
635-044-0000

Purpose The purpose of these rules is to 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 by OAR chapter 635, division 49.

635-044-0003
Definition of Terms

(7) "Hold" means any form of possession or control of a live animal, gamete, or hybrid thereof

(15) "Propagation" is the breeding, reproduction, production, incubation, or rearing of wildlife by a human for sale, release, or other uses.

(17) "Release" is permitting any legally collected wildlife, domestically raised or imported wildlife currently or previously in possession to exist alive outside an approved holding or propagation facility.

20) "Take" means to kill or obtain possession or control of any wildlife (ORS 496.004 (16))

635-044-0005 [0130]

Protected Wildlife

(1) Except as provided by ORS and OAR 635-044-0010, 635-044-0020, 635-044-0030, 635-062, 635-050, 635-056, 635-200-0040; it is unlawful for any person to capture, hold, or have in possession, either dead or alive, whole or in part, any wildlife listed in this section:

635-044-0010

Capture and Holding of Wildlife

Wildlife may not be captured from the wild and/or held unless authorized by the Director or after acquiring:

(1) Wildlife Holding Permit (635-044-0020 (1) and 635-044-0030);

(3) Wildlife Propagation License (635-044-0060(1)) including select native and game bird species as defined in 635-045-0002 (34) of the families Columbidae, Anatidae, Tetraonidae, Phasianidae and Odontophoridae or other wildlife species approved by the Director.

(6) Scientific Taking Permit (OAR 635-043-0023);

Send to Trent

(7) Game Bird Release Permit for Hunting Dog and Raptor Training and Competitive Hunting Dog Trial Permit (applicable to common pheasant (all races of *Phasianus colchicus*); California (valley), bobwhite and Coturnix quail; Hungarian (gray), chukar, and red-legged partridge; or mallards as defined in OAR 635 Division 046.

(15) Scientific Taking Permit (OAR 635-007-0900);

635-044-0015

Permit Required to Hold Wildlife

635-044-0015

Permit Required to Hold Wildlife (1) Captured and held nongame wildlife species listed in 635-044-0030 require a Wildlife Holding Permit when more than two (2) animals per species are held [except] or unless authorized under a permit listed in 635-044-0010.

(2) Wildlife Holding Permits are specific to the species held, permit holder and to the holding facility described on the permit.

(3) Wildlife legally held and defined under 635-044-0020 and 635-044-0025 requires a Wildlife Holding or Wolf Holding Permit.

(4) Certify to the Department that the Wildlife Holding permittee's species held complies with any applicable city or county ordinances and any applicable federal laws.

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.

(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.

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 held. A Wildlife Holding Permit is required to hold more than two animals per species for each facility or household. The following list of species is determined to be demonstrably widespread, abundant, and secure through the Oregon Biodiversity Information Center (ORBIC) 2013 -- Rare, Threatened and Endangered Vertebrate Species of Oregon, Updated September 2013:

a) Amphibians

- (A) Northwestern Salamander (*Ambystoma gracile*)
- (B) Long-toed Salamander (*Ambystoma macrodactylum*)
- (C) Coastal Giant Salamander (*Dicamptodon tenebrosus*)
- (D) Ensatina (*Ensatina eschscholtzii*)
- (E) Western Red-Backed Salamander (*Plethodon vehiculum*)
- (F) Rough-Skinned Newt (*Taricha granulosa*)
- (G) Pacific Treefrog or Pacific Chorus Frog (*Pseudacris regilla*)
- (H) Great Basin Spadefoot (*Spea intermontana*)

b) Reptiles

- (A) Great Basin Whiptail (*Aspidoscelis tigris tigris*)
- (B) Northern Alligator Lizard (*Elgaria coerulea*)

- (C) Southern Alligator Lizard (*Elgaria multicarinata*)
- (D) Western Skink (*Plestiodon skiltonianus*)
- (E) Northern Sagebrush Lizard (*Sceloporus graciosus graciosus*)
- (F) Western Fence Lizard (*Sceloporus occidentalis*)
- (G) Common Side-Blotched Lizard (*Uta stansburiana*)
- (H) Western Rattlesnake (*Crotalus oreganus*): excluding Willamette Valley populations
- (I) Pacific Gopher Snake (*Pituophis catenifer*)
- (J) Western Terrestrial Garter Snake (*Thamnophis elegans*)
- (K) Northwestern Garter Snake (*Thamnophis sirtalis*)

(c) Mammals

- (A) North American Porcupine (*Erethizon dorsatum*)
- (B) Long-Tailed Vole (*Microtus longicaudus*)
- (C) Montane Vole (*Microtus montanus*)
- (D) Ermine (*Mustela erminea*)
- (E) Long-Tailed Weasel (*Mustela frenata*)
- (F) Bushy-Tailed Woodrat (*Neotoma cinerea*)
- (G) Deer Mouse (*Peromyscus maniculatus*)
- (H) Coast Mole (*Scapanus Orarius*)
- (I) California Ground Squirrel (*Spermophilus beecheyi*)
- (J) Belding's Ground Squirrel (*Spermophilus beldingi*)
- (K) Brush Rabbit (*Sylvilagus bachmani*)
- (L) Douglas's Squirrel (*Tamiasciurus douglasii*)

- 2) Additional species may be petitioned for proposed inclusion to or removal from the list of species permitted and held under a Wildlife Holding Permit with a written request and justification submitted to the Director.
- 3) Wildlife listed in this section and captured from the wild and held for more than 48 hours in captivity or held on a Wildlife Holding Permit must remain in captivity for the life of the animal and may not be returned to the wild without prior approval by the Director.

This rule does not apply to wildlife held under 635-062-0000 (Wildlife Rehabilitation).

Stat. Auth.: ORS 498.002, 496.171 - 182

Stats. Implemented: ORS 498.002, 496.171 - 182

635-044-0035

Cost and Expiration Date, and Changes to a Wildlife Holding Permit

- (1) Any person desiring to obtain a Wildlife Holding Permit must be an Oregon resident with a legal Oregon address and submit a complete application and a non-refundable application fee of \$25 and license agent fee listed on the permit application [plus a \$2.00 license agent fee]. A separate application and associated fees are required for each species requested for holding. Upon approval of application, a permit will be issued for approved species.
- (2) The Wildlife Holding Permit expires on December 31 of the year issued.
- (3) All permit renewals and payment of associated fees must occur before the expiration date of the current permit. Verification of annual permit requirements (if applicable to the permit) must accompany the renewal application.
- (4) A new application is required for any change of 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 non-renewal 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.

635-044-0040

Requirements for Care of Wildlife Held in Captivity

Wildlife held in captivity under any permit, license, or condition listed in 635-044-0020 and 635-044-0030 or under a Wildlife Propagation license must be:

- (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
 - (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 trapping, or pursuit seasons, or for competitive hunting dog trials or training of hunting dogs and raptors.
 - (3) Facilities housing wildlife must meet ODFW minimum standards as defined in the ODFW Enclosure and Caging Standards for Holding Wildlife for Wildlife Held in Captivity (Exhibit 1); and
 - (a) Enclosed within suitable structures to prevent escape or prevent other wildlife from entry;

- (b) Applicants of Wildlife Holding Permits and holders of wildlife in captivity must demonstrate equivalency of facility construction with Department approval of all proposed facility construction design, materials, and specifications equivalent or exceeding the ODFW Enclosure and Caging Standards for Holding Wildlife.
- (4) Inspection of facilities by Department personnel may be conducted prior to approval of the permit.
-

635-044-0045

Inspection of Facilities

- (1) Facilities [for care of] holding captive wildlife are subject to inspection by any State Police officer or Department [of Fish and Wildlife] representative. Inspection of the facilities may take place without warrant or notice, but, unless prompted by emergency or other exigent circumstances, shall be limited to regular and usual business hours, including weekends. Nothing in these rules is intended to authorize or allow the warrantless search or inspection of a permit holder's residence.
- (2) Any inspection(s) of facilities by Department personnel for all permits issued under this Division involving approval of new or modified facilities may require a \$150 inspection fee as determined by the Department.
-

635-044-0050

Ownership of Captured Wildlife Held in Captivity

- (1) Native wildlife, or the progeny thereof, captured from the wild in Oregon remains the property of the State of Oregon.
- (2) Wildlife native to Oregon and acquired legally from an out-of-state propagator and held in captivity requires a Wildlife Holding Permit. They are not considered property of the state of Oregon but are subject to the same wildlife rules as legally acquired native wildlife collected in Oregon and held in captivity and cannot be sold, exchanged, bartered, transferred or released in Oregon except as authorized by the Director.
-

Wildlife Propagation License Regulations

635-044-0060

License Required to Propagate Wildlife

- (4) Any person desiring to propagate and sell or barter any raptor as defined in OAR 635-055-0002 (3) protected by federal law must first adhere to all permit requirements and regulations pertaining to the propagation and selling of raptors, as adopted by the U.S. Department of the Interior on July 8, 1983. (Federal Register, Vol. 48, No. 132, Part 21). The license holder must provide a copy of their current federal permits to the department with their application or renewal.
- (5) Licensed propagators with a 2015 license may petition to retain the species not listed in 635-044-0060 (1) for inclusion on their propagation license with a written request and justification submitted for approval by the Director.
-

635-044-006

Shipping Requirements

- (1) Any Wildlife shipped within or outside the state by the holder of a Wildlife Propagation License must have affixed to the shipping container a record showing:
- (a) Name, address, and Wildlife Propagation License number of shipper;
 - (b) Name and address of consignee;
 - (c) Species name (common and scientific) and numbers of wildlife contained; and,

(d) Import of wildlife to Oregon or export from the state requires a Certificate of Veterinary Inspection from a federally accredited veterinarian. Imported wildlife must be accompanied by an Oregon Department of Agriculture import permit with exceptions listed in OAR 603-011-0255.

635-044-0070 [635-044-0075]

Record Keeping and Reporting Requirements for Wildlife Holding and Propagation

(1) A record of all business transactions involving sale or purchase of eggs, [or] game birds, and all other wildlife native to Oregon must be current to date and available at the facility as listed on the permit. Records for the current calendar year must be made available for inspection by Oregon State Police or Oregon Department of Fish and Wildlife personnel.

(2) An annual report of operations must be [submitted with each license renewal application or by] received by January 15 [of the next year if the licensee does not submit a renewal application]. The annual report shall include the total number of animals by species purchased or acquired and all sales or transfers by species, including eggs, births and deaths within the previous calendar year [of all purchases and sales by species of mammals, birds, or bird eggs].

(3) Wildlife held under a Wildlife Holding or Propagation Permit must have prior Department authorization before transfer, transport or export from Oregon under a permit issued by the Department and must have a certificate of veterinary inspection and any import permit or license required by the receiving state.

635-044-0075

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.

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) Suspension, revocation or expiration of the Wildlife Holding Permit, Wolf Holding Permit, or Wildlife Propagation License;

(b) Denial of an application for license; or

(c) Receipt of a notice from the Department informing the holder that the wildlife held is/are not authorized by license.

(2) "Dispose" means to do the following in compliance with these rules:

(a) Humanely euthanize;

(b) Transfer to another licensed Wildlife Holding or Propagation facility; or

(c) Export from Oregon.

- (3) If the holder fails to dispose of any wildlife held by the deadline specified in paragraph (1), and if the Department determines that the wildlife held pose an imminent threat to wildlife, livestock, or public health requiring prompt action, the Department may humanely kill, confine, transfer, or otherwise dispose of the animals as it determines necessary. In all other circumstances, the Department may humanely kill, transfer, confine or otherwise dispose of the wildlife held only after providing the holder with notice and an opportunity for hearing. The Department may choose to keep the wildlife held on the holder's property until an appropriate means of disposal is found or pending a hearing. The Department bears no liability for such actions. Any wildlife held for disposal must be treated humanely in compliance with these rules.
- (4) The holders of any wildlife of which the Department disposes pursuant to paragraph (3) must compensate the State of Oregon for any and all expenses incurred by the State during disposition.
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635-044-0085

Control of Disease Outbreaks in Captive Wildlife

- (1) Diseased captive wildlife may be considered an imminent danger to public, wildlife, domestic animals, or livestock health.
- (2) An outbreak of communicable disease among captive wildlife determined to be an imminent danger to public , wildlife, domestic animals, or livestock health may require the Department to order the holder to euthanize, confine or transfer, by a specified deadline, any or all wildlife they hold.
- (3) Failure by the holder to take action ordered by the Department pursuant to paragraph (2), may result in the Department or its agents entering the holder's facility to confine, euthanize, or transfer diseased wildlife. Nothing in these rules is intended to authorize or allow the warrantless search or inspection of a permit holder's residence. The holder is liable for any costs the State of Oregon so incurs. The Department bears no liability for such actions.

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From: [Colin Gillin](#)
Sent: Wednesday, March 23, 2016 3:21 PM
To: [Richard F. Hoyer](#)
Subject: RE: proposed listing of snake in a protected status

Hello Richard

Our portion of the meeting ran from about 4 PM until 630-7. Long day to say the least. We had about 20 public commenters, which was dominated by those wishing to hold pet skunks, and then the animal entertainment industry requested exceptions to the proposals, the dog trial/training group wanting exceptions for holding and chasing raccoons, a home schooler asked to be treated the same as K-12 teachers when bringing wildlife into the classroom, and there were plenty of comments about non-native and ESA species which isn't part of the Div. 44 rulemaking, and a couple of herp collectors spoke with statements and questions about grandfathered species and the reporting and the cost of a holding permit, etc. It actually went fairly well, we received lots of positive and varied feedback, and we should be ready to go for the June 9-10 rulemaking.. Thanks again for your written comments.

We'll look at all the comments submitted, determine what we can do and options, and then provide a document of alternatives for specific issues to the commission. The draft rules and summary that will be given to the commission will then go out to the commission and public about May 27th .

If you have specific questions , feel free to call . Best regards.

Colin

From: Richard F. Hoyer [<mailto:charinabottae@earthlink.net>]
Sent: Tuesday, March 22, 2016 7:01 PM
To: Colin Gillin; Richard F. Hoyer
Subject: Re: proposed listing of snake in a protected status

Colin,

I did not attend the March 18th Commission meeting. Can you tell me what transpired at the meeting, and what process is to take place from here into June?

Richard F. Hoyer

Kevin Blakely

From: Colin Gillin
Sent: Thursday, April 28, 2016 10:00 AM
To: Roxann B Borisch; Kevin Blakely
Subject: FW: skunks
Attachments: Commissioner letter 4 13.docx

From: melinda hodge [mailto:lazyjranch100@yahoo.com]
Sent: Thursday, April 28, 2016 8:58 AM
To: colin.m.gilllin@state.or.us
Subject: skunks

Wanted to thank you for your quick answer to my questions. I share this information with the other skunk owners who were present at the 3/18 hearing, so that you won't be flooded with numerous people asking the same questions. One question I seem to be getting from a number of owners is if ODFW is looking at allowing us to keep more than 3 skunks. We love our skunks so much that some of us would like to expand our skunk families.

As you can see in the attached letter, I was asking if at the very least, we could have more than 2 if we were fostering one, or if one of our skunks was very old or ill and we wanted to get another to keep company with our other skunk. However, it would be in the best interests of all of the skunk owners I know here in Oregon, if we could just be allowed the opportunity to expand our skunk family to a reasonable amount beyond two.

Just wanted to know if you knew what the ODFW is thinking concerning this matter.

Respectfully,

Melinda Hodge

Kevin Blakely

To: Ronald Anglin
Subject: RE: skunks

From: Colin Gillin
Sent: Tuesday, April 26, 2016 3:03 PM
To: 'lazyjranch100@yahoo.com'
Subject: Division 44 proposals

Dear Ms. Hodge

Ron Anglin forwarded your email to me – thanks for your email and interest. At this point, we plan to provide additional alternatives to the commission as recommendations which will likely include removing the grandfathering classification for pet skunks resulting in not requiring an AZA facility for future skunk acquisitions. We will also likely recommend permanent marking of pet skunks but provide several marking options for held animals. The draft rules will be available by May 27th as they are still in internal review. If you have any further questions please feel free to call me – I'd be more than happy to discuss these rule recommendations with you.

Best regards

Colin Gillin
State Wildlife Veterinarian
Oregon Department of Fish & Wildlife
Corvallis, OR 97330
Ph 541-757-5232
Cell 541-231-9271

From: Ronald Anglin
Sent: Tuesday, April 26, 2016 1:59 PM
To: Kevin Blakely; Colin Gillin (colin.m.gillin@state.or.us)
Subject: FW: skunks

Thanks guys

Ron Anglin
Wildlife Division Administrator
Oregon Department of Fish & Wildlife
503 947-6312

From: melinda hodge [<mailto:lazyjranch100@yahoo.com>]
Sent: Tuesday, April 26, 2016 10:43 AM
To: Ronald.E.Anglin@state.or.us
Subject: skunks

1. Hearing rumors that the AZA standards will be lifted for domestic pet skunks. Is this true?
2. Also hear that microchips will be required for incoming black and white skunks, but not other colorations. Is this true?

3. Will older skunks already legal in Oregon also be required to be microchipped? I have an eight year old skunk with a heart condition, and was told she might not make it through such an ordeal
4. Do you know when the rule changes pertinent to skunks will be addressed, i.e. date and whether am or pm?

Anything you can share with me concerning the aforementioned questions will be greatly appreciated

ODFW WildlifeInfo

From: Roland Sonnenburg <roland@talentedanimals.com>
Sent: Thursday, March 31, 2016 9:24 AM
To: odfw.wildlifeinfo@state.or.us
Subject: Section 44 Revisions

Dear Chair Finley and members of the Commission,

I wanted to send you a brief, simple list of the six changes that would need to be made to make the Section 44 revisions tenable:

1. **Exempt USDA licensees**—these are professionals who are already inspected, already meet federal caging requirements, already have annual vet visits, and already carefully identify and care for each animal they possess. This would protect the serious, world-class, private institutions in the state. Would protect the film industry. Would ensure there are facilities who can take in these species when needed.
2. **Redefine wildlife to mean animals that live in, or have lived in, the wild.** Really, if you do this it solves all of the shortcomings of these revisions practically and philosophically. We all want strong rules protecting wildlife, but pets are not wildlife, regardless of species. These animals do not come from the wild, will not return to the wild, do not interact with the wild, have nothing to do with wildlife. Section 44 really ought to prohibit taking or releasing animals into the wild, but animals that are captive bred and owned and are pets really have nothing to do with these regulations—they are not wildlife.
3. **Remove number limits from grandfathered animals.** These animals are already here, being cared for, and causing no problems. They will soon be dead, gone, and unreplaceable. A number limit is unnecessary and cruel.
4. **The burden of proof that an animal is pure and not a hybrid must fall on the accuser.** Placing the burden and cost on owners to prove that their animals are not pure is unreasonable. Dr. Gillin testified that trying to prove heritage was too expensive and inaccurate for the state, so instead he proposes that private citizens bear this burden. Presumptive innocence is a cornerstone of our legal system. Under these revisions, any owner of any dog could be accused of having a pure wolf, and would somehow need to prove that Fido was actually a dog...
5. **Remove the transport rules.** The transport rules are impossibly restrictive. Nobody will be able to do much with their animals, and if the animals are responsibly owned pets there is little reason a person should not be able to transport them. These rules are also superfluous—the only few people who will be allowed to have animals are people who need to transport them.
6. **Limit inspections to annual.** There cannot be unlimited inspections at the animal owner's expense.

Warmly,

Roland Sonnenburg

Roxann B Borisch

From: Colin Gillin <colin.m.gillin@state.or.us>
Sent: Friday, April 01, 2016 10:59 AM
To: Roxann B Borisch
Cc: Kevin Blakely
Subject: FW: Proposed Changes to 635 OAR

From: Tracy Hawkins [mailto:tbrogioitti@gmail.com]
Sent: Thursday, March 31, 2016 5:30 PM
To: colin.m.gillin@state.or.us
Subject: Proposed Changes to 635 OAR

Hello,

I am writing regarding the proposed changes to Chapter 635 OAR. I am a wolf dog owner and trainer, and have been for over a decade now. Your proposal concerns me in many ways. We have been law abiding citizens with absolutely no incidents from any of our animals and so have all of our friends who also own wolf dogs. I do not understand what spurred the idea for this change as Oregon has not seen an actual incident from an actual wolf dog in quite some time. Now, I can understand that due to increasing wolf populations you're concerned about people den robbing and breeding/selling wild caught wolves, and I would support a well written change that specified against den robbing wild pups. However, all wolf dogs, even high contents, produced today come from lines long bred in captivity. Even the pures used are coming from captive bred lines from fur farms and not the wild. Captive bred for decades, to make the animals more tractable.

You say that proof that an animal in question is not a pure will fall on the shoulders of the owner. Considering DNA testing is not 100% accurate, I fear for innocent high content wolf dogs that register as pure in a test. These tests still sometimes show pure dogs as having wolf content and are not completely accurate in their readings. If you would like, please look up Karma the Husky's story. A husky, claimed to be a wolf mix from a misunderstanding, almost lost her life because she fell in the UC Davis test's margin of error. Knowing that the test is not infallible, how can you say that it's the owner's responsibility to prove their animal is part dog and not pure wolf? Also, a few of my friends have been the victims of new neighbors moving in and being scared of their animals for no reason, and calling in complaints just because. How is it fair, if the owner is representing their animal correctly as a wolf dog, that any person that wanted to call in and say it was a pure wolf would be more trusted? Also, what about neighbors that hate someone's husky, malamute or mix thereof just because they think it's a wolf? Are your officers going to be trained to phenotype animals so that they can recognize what is and isn't a wolf? After speaking to a Polk county officer in charge of animal control (and as such, wolf dog inspections for the county) it was very obvious to me that the state issued info packet on wolf dogs has many wrong facts in it and that what he was saying was "obviously an almost pure wolf dog" was probably very little to no wolf at all. That makes me very worried for innocent dog owners of wolfy looking dogs. How many innocent pets will end up dead just because of what they look like? Not because they've done anything wrong, just because someone's scared of wolves in general and no other reason?

Now, I raise wolf dogs, some looking pure but aren't. I'm lucky enough to have a pedigree that shows exactly where the dog in their lines are. But not all are that lucky, as not all breeders are that good with records and some have rescues that really aren't going to have any back ground info. My animals work. They are models, actors and ambassadors. They are high trained. Well kept and not a danger. This goes for many Oregon wolf

dog owners, most actually. Why treat any of us like criminals when we do everything right already? And for those of my friends who do have pures (and the permits) but would now be over the limit of animals, why should they have to pick animals to kill when they have been safe and followed the law?

From reading over your proposed changes I think that what you're trying to accomplish, can be accomplished by going after people who take animals from the wild and try to harbor them without the proper permits. It also seems to me, that you would make plenty of money off of permit sales and renewals for pure non domestic species and you would lose a lot of money as the movie industry, and others find places other than Oregon to shoot so they can use the animals they need. Plus it takes time and man power off of more important things, like hunting down poachers, to go and follow a "wolf" claim that will 9.5/10 times be a wild goose chase. The state of Oregon already considers hybrid cats and dogs to be domestic species, and with no significant issues involving ACTUAL wolf dogs (not misrepresented dog mixes) there's just no reason to change the rules after all this time.

Thank you,

Tracy Hawkins

Marion County, Oregon

Roxann B Borisch

From: Mike Martell <mmartell1957@gmail.com>
Sent: Wednesday, April 06, 2016 10:17 AM
To: odfw.commission@state.or.us; REP Sprenger; REP Barreto; REP Esquivel
Subject: Wildlife Management or lack thereof in Oregon
Attachments: SCAN0428.JPG; SCAN0431.JPG

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Forwarded to Wildlife

I hope you folks are beginning to get the picture.

I posted a cougar caught in a cable snare set over a rank rotten stinking beef head, intended to attract bears for twenty five miles or less to a certain location. This is one of two cougar caught in a ankle catch snare intended for spring timber damage black bears. Over the course of ten days a contractor hired privately to remove bears managed to catch two cougar in the same set. Both were shot and dumped in the same manner you folks do cougar on the administrative removal programs, only difference? These two cougar didn't end up in the landfill, they both were left to rot. I brought my concern up with your Administrator and had it explained to me that there are provisions where a badly maimed animal may be euthanized by the Agent or contractor and both were euthanized for this reason.

Neither were collected for data? When it's related to the State or Federal Government, there is a double standard. I do this on my ranches in S.W. Oregon three times now under H.B. 4046? I'm a felon and must pay restitution of \$22,500 or \$7,500.00 per each animal.

Let me be very CLEAR.....Snares are anything but HUMANE! Other than the continued mindset of killing animals, what USDA does best, if these two cougar HAD to be euthanized as a result of injuries sustained by the cable snare? You can't make any kind of an argument these apparatus are HUMANE, now can you?

Looking back on USDA? 100% of the Western Oregon Agents would be felons and owe restitution close to one million dollars.....But you are more concerned about inviting the humane society to the table to figure out how you eliminate us from keeping a pet raccoon for our water race events under Division 044?

The bottom picture is also dated. Back after the 1994 ban, I sold my bear dogs and kept a chicken bobcat hound and used it to haze crop damage bears. John Thiebes, retired biologist for ODFW, Central Point Oregon long about 1997 approached me and said if I use a hound to haze a bear and the second it's foot touches BLM-Forest Service, I'm going to receive a citation for breaking the law, so we ordered snares and I built the barrel trap. the picture posted below depicts the stress and real agony and represents death....That's it! Death! Nothing humane about an animal breaking it's claws and teeth as it struggles frantically to free itself from impending death.....

Oregonians- ODFW Commission and most all the legislature have a problem with hounds? Hounds that catch 100% off a peeled tree or off crop damage like a highly trained police dog, now I'm mandated with this inhumane nonsense? I can prove I can lure an unsuspecting bear straight out of Northern California. Now, please explain why Division 044 is a priority for the Commission? You really aren't interested in non lethal methods as a first line of defense, are you? It's just easier to keep telling our elected officials in Salem how sport hound hunters can't be trusted! Please explain how USDA Wildlife Services can? Hounds are the only proven method for ethical safe catch and release, now you know why USDA simply shoots those first year baby cubs



This is one of two cougar caught in the same SNARE
NET in less than 10 days. These snares are set for
spring timber damage black bears by USDA Aphis
Wildlife Services and Contractors just outside of
Sweet Home Oregon. Severly damaged by the snare, B
cougar were euthanized and dumped.

Roxann B Borisch

From: Emily Jenkins <esjenkins@gmail.com>
Sent: Monday, April 18, 2016 8:44 AM
To: odfw.commission@state.or.us
Subject: Update to Div 44 as it pertains to skunks
Attachments: mouseandmolly.jpg

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Forwarded to Wildlife

Good Morning,

My name is Emily Jenkins, I had the privilege of speaking to you all at the meeting on March 18th along with several of my fellow skunk owners and lovers. I am wondering when we can expect to see the newest revision of Division 44?

Although it was a very long day for all of us, I cannot express enough how much I appreciate the fact that you took the time to listen to us all, and give consideration to our testimony. I've never been active in any sort of legal matters, but it was very rewarding to see that you truly value the public's testimony.

I have been periodically checking the website for the newest update to Div 44, but have not seen it yet. I was under the impression that we would have it available by now because you were open to new public commentary as of April 15th.

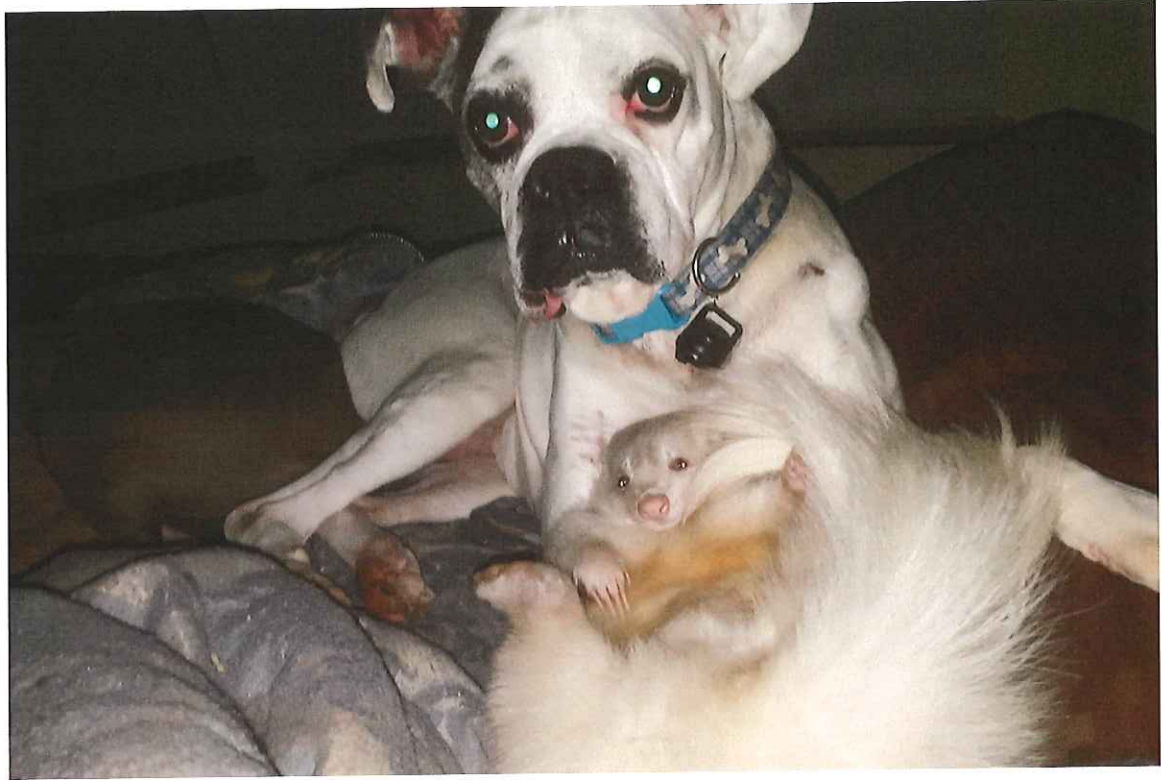
It is currently breeding season for skunks and I am hoping to purchase a baby boy in June, but am anxiously waiting to see how the new laws will affect us before I commit to the purchase.

Thank you again,

Emily Jenkins
(and Mouse-skunk)

Amity, OR

503-910-5507



Roxann B Borisch

Subject: FW: A heartfelt thank you and a few suggestions!

From: Marilyn [<mailto:mparadise59@yahoo.com>]
Sent: Tuesday, April 26, 2016 5:59 PM
To: odfw.commission@state.or.us
Subject: A heartfelt thank you and a few suggestions!

April 26, 2016

Dear ODF&W Commissioners,

I would like to thank you for your valuable time in the March 18, 2016 meeting concerning our pet skunks.

Although after leaving the meeting we felt much relief about the outcome that may take place in June, I realize this isn't over until your vote. I am personally writing this letter with some suggestions if we must still remain on your list to "ban" skunks.

1. All new entries of skunks must be spayed or neutered within a reasonable time, this is due to the health of the skunk and will not give the opportunity to breed skunks. Since going through their 'heat stage' it can impact their heart and health. It also calms skunks down and new owners that are not educated in skunks can become very disappointed about a rambunctious skunk.
2. That no breeding facility would be placed in Oregon. An Oregon breeder would make it easier to obtain a skunk. More people may purchase a skunk on a whim. As we explained in the meeting, these are purchases that should be taken seriously. A breeder may not be as vigilant in educating and informing a prospected buyer. We, as skunk owners, tend to discourage others to purchase until they are totally aware of the responsibilities of owning a skunk. Purchasing and preparing for a skunk is quite an investment and should not be taken lightly.
3. Identifying by microchip or ear tattoos for new incoming skunks would be acceptable and easier to offer especially if done when spay or neutering procedures where being implemented. Since spaying and neutering is recommended between 3 and 6 months the microchip or tattooing would not be in place until that time.
4. Requiring distemper and rabies shots. Even though there is only 'off label' vaccinations for skunks, we may find in the future that these have become the answer all along as being effective. Being responsible owners we do vaccinate them for distemper and rabies. There has not been an outbreak in distemper in our domesticated skunks. As far as rabies, this thankfully seems to be coming an extremely controlled disease. Bait traps you have dispersed in the wild may be controlling a whole new generation of wild animals.

It may be out of your control, but after realizing how responsible that we as domesticated skunk owners are, and the requirements of vaccinations, it would be appreciated if considering not euthanizing a pet skunk for rabies testing. As times have changed and the post exposure vaccination has become proven as 100% effective. It would benefit us if a quarantine time be implemented rather than euthanizing our pets. All proof of vaccinations, documentation of exposure to other animals and any other information requested from authorities would be provided.

Veterinarian Melinda Surrency brought up an outstanding point in the meeting, that was education. As a special education assistant for the last 21 years I have seen rules change within school districts. Our district, as several in Oregon, have banned animals in their schools. Growing up we had the class pet, we learned how to care for the pet. The responsibilities of taking care of a pet. It was a valuable lesson. NO! I am not advocating skunks as class pets. Since these bans of class pets has come in effect I have noticed the rise in younger people involved in animal abuse. They haven't had the opportunity to learn about an animal and the love and respect we need to give them, as we taught in schools years ago. I realize this is a school districts decision, but would like the opportunity to teach younger children the importance of pets. I show pictures of Bella to my special ed students, answer their questions. The first thing I explain is that Bella is and never was a wild animal, she was bought from a breeder. It would be wonderful to adapt a way to continue to educate all students of the importance of never removing an animal from the wild. To respect and care for all animals and that an abuse of an animal is cruel and inhumane.

These were just a few personal thoughts. Believe me, I will not be drowning you with letters and phone calls. This will most likely be the last time you will hear from me until the June meeting.

Again, thank you for your valuable time.

Marilyn Maxine Van Dyke
Mparadise59@yahoo.com
(503) 784-5448

Sent from [Mail](#) for Windows 10

Roxann B Borisch

From: Laura Isaacson <lisaacson@beobank.com>
Sent: Thursday, May 05, 2016 1:40 PM
To: odfw.commission@state.or.us
Subject: Division 044

I am opposed to Division 044 for the illegal use of use of a raccoon in a field trial or water race.
Thank you
Laura R. Isaacson

CONFIDENTIAL NOTICE: Bank of Eastern Oregon does not send unsolicited e-mail. This e-mail message is considered privileged and confidential and is intended only for the addressee. If you believe this has been sent to you in error, do not read it. Please reply to the sender that you have received the message in error and then delete it. Thank you. Please consider the impact to the environment and your responsibility before printing this e-mail.

Roxann B Borisch

From: Michelle Pritchard <michelle_pritchard.com@hotmail.com>
Sent: Thursday, May 05, 2016 1:32 PM
To: odfw.commission@state.or.us
Subject: Division 044

Good afternoon,
I would just like to say that I opposed Division 044. And I feel that you should too.
Thank you,
Michelle Pritchard

Roxann B Borisch

From: Curt Preston <curtj27@yahoo.com>
Sent: Thursday, May 05, 2016 12:53 PM
To: odfw.commission@state.or.us
Subject: division 044.

I am a life long resident of Oregon. I am opposed to division 044. In my opinion is bad for Oregon and is a biased if implemented to the non hunting supporters.

[Sent from Yahoo Mail on Android](#)

Roxann B Borisch

From: Zach Bagamary <zach.bagamary@gmail.com>
Sent: Thursday, May 05, 2016 11:30 AM
To: odfw.commission@state.or.us
Subject: Division 044

Commission,

I and several others are opposed to your recent proposal set to become law division 044. How can that be an ethics violation for training hounds on a caged coon, field trials and water races? The caged coon can simply be let free afterwards, with no harm done! Especially when the state is hiring USDA to come in and hunt with hounds and harvest bear, cubs and cougar kittens by the hundreds and simply landfill them on timber property? And yet caged coons are in ethics violation? Isn't that the pot calling the kettle black? Makes absolutely no sense whatsoever! Hunting with hounds is the ONLY way to selectively harvest game, by doing so you can selectively harvest mature trophy class animals and simply let anything else go free and unharmed!!! Where is an ethics violation in that? And why can't usda kill bear sow and cubs and lions and bury them by the hundreds, but the citizens can't even run hounds on them to selectively harvest only mature males? Ridiculous. I urge you all to rethink this.

Furthermore, Under current law h.b. 4046, usda would pay the state over 1 million in restitution and you have a problem with hounds hunters using a live coon for training purposes to be set free! Why the problem with houndsmen? Shouldn't your problem be with the usda?

Please block this from passing. Thank you all and I hope you will make the right decision!

V/r
Zach Bagamary

Sent from my iPhone

Roxann B Borisch

From: Will Chambers <beachcreek23@icloud.com>
Sent: Thursday, May 05, 2016 10:34 AM
To: odfw.commission@state.or.us
Subject: 044

Against division 044!

Will Chambers
Keep Dog Hunting Legal
Beach creek kennels

Sent from my iPhone

Roxann B Borisch

From: Robert Crook <crookrb69@gmail.com>
Sent: Thursday, May 05, 2016 7:11 AM
To: odfw.commission@state.or.us
Subject: 044

I oppose division 044 and would hope that a law making it illegal to use a raccoon in a field trial would never happen as the raccoon is perfectly safe from any harm, there are bigger issues that odfw should be concerned about rather than voting to take more rights away from us.

Roxann B Borisch

From: Richard F. Hoyer <charinabottae@earthlink.net>
Sent: Thursday, May 12, 2016 9:38 AM
To: odfw.comments@state.or.us; Richard F. Hoyer
Subject: Rivision of Div. 44 regulations

To: Oregon Wildlife Commission
From: Richard F. Hoyer
Re: Revision of Division 44 regulations

“ODFW's Conservation Program is chartered with serving this large nongame population through management and conservation programs. The program also seeks to inform, to educate and to enhance recreational opportunities involving wildlife.”

(ODFW “Programs of the Wildlife Division.” <http://www.dfw.state.or.us/wildlife/programs.asp>.)

Comments:

The ODFW Wildlife Division involved with game species has historically promoted and encouraged public participation in our wildlife resources. As one example, a number of years ago, ODFW put on a Small Game clinic at the E. E. Wilson Wildlife Area in which as part of the clinic, I gave a presentation on falconry that included hunting rabbits with raptors.

In contrast, the ODFW Wildlife Division involved with non-game species does just the opposite. Every provision in the proposed regulation has a negative and punitive nature. Instead of fostering educating the public and enhancing recreational opportunities, the proposed regulation can only produce the opposite effect. To not understand that reality and claim otherwise is irrational.

As a former secondary school science teacher, the proposed regulation can only have the affect of reducing public involvement and student leaning experiences with respect to our non-game species of wildlife.

Last, below is a list of my published research. None of those studies could have been undertaken had the provisions in these revised regulations been in place. Should the proposed revision of Div. 44 regulations be adopted, they will effectively terminate all future efforts. As unintended consequences, they can only have the affect of hindering and suppressing similar research efforts by other individuals.

Richard F. Hoyer (Fisheries and Wildlife, OSU, '55')

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

Nussbaum, Ronald A., and R. F. Hoyer. 1974 Geographic variation and validity of subspecies in the rubber boa, *Charina bottae* (Blainville). *Northwest Sci.* 48:218-229

Hooven, E. F., and R. F. Hoyer. 1975 Notes on the Vagrant Shrew, *Sorex vagrans*, in the Willamette Valley of Western Oregon. *Northwest Sci.* 49:163-173

Hoyer, R. F., 1979 Genetics of a color mutant in *Charina bottae*. (Abstract only.) Joint Annual Meeting, 26th Annual Meeting of the Herpetologist's League, 21st Annual Meeting of the Study for the Study of Amphibians & Reptiles Knoxville, Tenn. 12-16 August, 1979

Hoyer, R. F. and Robert M. Storm. 1991 Reproductive Biology of the Rubber Boa (*Charina bottae*) 15th International Herpetological Symposium on Captive Propagation and Husbandry. Seattle, Wash., 20-23 June, 1991. (Proceeding published in 1992.)

Hoyer R. F. and Glenn R. Stewart. 2000 Biology of the Rubber Boa (*Charina bottae*), with Emphasis on *C. b. umbratica*. Part I: Capture, Size, Sexual Dimorphism, and Reproduction. *J. of Herpetology*. 34:348-354

Hoyer, R. F. and Glenn R. Stewart. 2000 Biology of the Rubber Boa (*Charina bottae*), with Emphasis on *C. b. umbratica*. Part II: Diet, Antagonists, and Predators. *J. of Herpetology*. 34:354-360

Hoyer, R. F., 2001. Discovery of a Probable New Species in the Genus *Contia*. *Northwestern Naturalist*. 82:116-122

Hoyer, R. F., R. P. O'Donnell, and Robert T. Mason. 2006 Current Distribution and Status of Sharp-tailed Snakes (*Contia tenuis*) in Oregon. *Northwestern Naturalist*. 87:195-202

Hoyer, R. F. 2007 The Fallacy of Perceptions *J. Kansas Herpetology*. #21 (March 2007) 5-10

Feldman, C. R., and R. F. Hoyer. 2010 A New Species of Snake in the Genus *Contia* (Squamata: Colubridae) from California and Oregon. *Copea*. 2010 #2 254-267

Hoyer, R. F. 2015 Thoughts on the Southern Rubber Boa, *Charina bottae umbratica* (Serpentes: Boidae). *Southwest Center, Herpetological Research* 5:27-38

Roxann B Borisch

From: Richard F. Hoyer <charinabottae@earthlink.net>
Sent: Thursday, May 12, 2016 10:07 AM
To: ODFW; Richard F. Hoyer
Subject: Revision of Div. 44 regulations

To: Oregon Wildlife Commission
From: Richard F. Hoyer
Re: Revision of Division 44 regulations

“The purpose of these rules is to 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 by OAR chapter 635, division 49.”

(DIVISION 44 PROTECTED WILDLIFE, HOLDING, AND PROPAGATING RULES 635-044-0000)

With respect to the above stated purpose, missing is any reasoned justification for the proposed rules. Consequently, there is no practical benefit to the public at large for the proposed rule changes. What then comes to mind is the adages, ‘If it ain’t broke, don’t fix it.’

In addition, there is no conservation value in the proposed rule changes. I am reminded of the saying, ‘There is no need to manage species that are not in need of being managed.’

And last:

“The Oregon Conservation Strategy provides a blueprint and action plan for the long-term conservation of Oregon’s native fish and wildlife and their habitats through a non-regulatory, statewide approach to conservation.”

(ODFW “Programs of the Wildlife Division.” <http://www.dfw.state.or.us/wildlife/programs.asp>.)

The current proposed expansion of Div. 44 regulations is a contradiction to the above stated, ODFW goal for a non-regulatory approach.

Richard F. Hoyer (Wildlife biologist, Field herpetologist, Corvallis, Oregon)



My Mirabella

4/13/2016

Dear Curt Melcher, Deputy Director ODFW,

I am writing to you concerning a few issues not yet addressed, as well as revisiting a few areas of concern.

New areas of concern

- 1) Skunks should be allowed transfer of ownership for the following reasons:
 - a) Owner is deceased
 - b) Owner is disabled
 - c) Owner lives where pet skunks are not allowed, such as a nursing home or living situations not allowing such pets
 - d) Owner is deployed
 - e) Owner is forced to move out of state where skunks are not allowed, for reasons such as a job, education, or family emergency
 - f) Irresponsible skunk owner has had their skunk confiscated by ODFW
 - g) Other reasons

Pet skunks should not be euthanized, if for some reason their owner is prevented from caring for them. I am in the process of writing a will as to whom my dogs and cats (and skunks) will be left to when I die or become disabled. My pet skunk should be given the right to go to a good home, like my cats and dogs.

I am sure that Oregon Skunk Owners would be glad to help in this matter. I, for one, would be glad to assist ODFW in establishing a workable program for this. My self, as well as other Oregon Skunk Owners could foster these skunks until a good home is found.

635-04400050 states that skunks "cannot be sold, exchanged, bartered, transferred, or released in state of Oregon except as authorized by director. Perhaps some of the aforementioned reasons could be included in the Division 44 rule changes as legitimate reasons for having "transfer of ownership" Reasons not mentioned, could be resolved at the discretion of the director.

- 2) Ownership of skunks may exceed maximum number of skunks allowed when...
 - a) Owner is fostering a skunk due to one of the aforementioned reasons in item #1
 - b) One of the owner's skunk has medical problems that indicate that the skunk will not live much longer, as verified by vet records. New skunks have to be purchased while available seasonally. It should be noted that skunks breed only a few times during the year, and that they are only available during select short periods of time. Maintaining an additional skunk before the ill skunk dies, will help the other skunk in the family deal with the loss of its skunk buddy, and help in the grieving process.
- 3) Once these rules go into effect, it would be helpful for all of the parties involved, to have a beginning and ending date in effect for the rules.

In that way, no new rules can mysteriously surface and be kept from the general knowledge of the public, especially skunk owners. I was never notified of these pending rule changes, and I legitimately brought my skunk into the state of Oregon, going through the necessary channels.

My address was registered and I therefore should have been contacted. I personally feel that I will forever have to look over my back out of fear that someone has pulled a rule change without my knowledge that has detrimental impact on my pet skunk.

- 4) Can an Oregon Skunk Owner representative attend ODFW meetings to safeguard us from having mystery rule changes occur, without our knowledge that are detrimental to the well being of our pet skunk?
- 5) If any on the commissioners would like to meet with any of the Oregon Skunk Owners before the June rule change date, please e-mail me at lazyJranch 100 @yahoo.com and I will contact some of the people who spoke before the commission to see if they are interested. I know that I am, and will be willing to go anywhere in the state, provided I am given sufficient notice

Old areas of concern

- 1) AZA standards
I hope you have had the opportunity to review the proposed rule changes concerning the AZA standards. I hope you see that these rules are as absurd as I do.

A pet skunk does not meet the definition of a zoo which is an "establishment that maintains a collection of wild animals, typically in a park or garden, for study, conservation, or display". The

definition of aquarium which is too obvious, also does not apply to my household consisting of 1 skunk, 2 cats, and 1 dog.

The idea that my private home be open for tours of people is absurd. I am asked to keep my home open to the public, who will never come. Moreover, I am expected to have brochures, wheel chairs, strollers, sidewalks, adequate parking, etc. for the people who will never come, and that I don't want to come.

The state of Oregon prohibits me from breeding skunks, yet the AZA encourages it. I do not want to conduct research. I do not want to display my skunk for public view. Both of these AZA requirements would inflict a great deal of stress on my skunk and are totally unnecessary.

The ODFW and the AZA standards are clearly in direct conflict with each other, and would make ownership of a pet skunk impossible for anyone.

A better alternative is a good home environment

I just want to love my skunk and provide her with the best life possible, which includes a premium skunk diet, and premium health care.

My skunk chooses to make her sleeping nest out of flat stuffed toy skunks and my down pillow. She chooses to tug on my bed sheets or my pants leg when she wants "up". She touches me with her nose when she wants "down". After she runs to the "cat box" she then tells me that she wants "up" again.

I provide her with "food forage obstacle tray units" that provide her with physical activity and intellectual stimulation in order to get to her treats.

My house additions were designed with a small atrium for my skunk and the cats to safely play in, complete with a rock fountain and pebbles. It will soon have access through mini "cat and skunk doors" into various parts of my home.

I have done everything I can think of to make my home the ideal home for my little Mirabella. I think if she could talk to other skunks she would brag that she is living at "Disneyland", or at least a dream world.

I have probably gone "overboard" as far as to what lengths I will go through for my skunk, but she is the most special, sweetest, and affectionate pet I have ever had. I love her so much, and always have her best interests at heart. I want to continue to have the right to have pet skunks in the future and to continue to raise them in a loving home environment. I cannot imagine a life without them.

- 2) Caging requirements – inside the home is a much safer environment than imposed isolation outside in a cage. It allows for the skunk to interact with their owner, other pets, and the home environment around them. This provides more opportunity for exercise, enrichment, and

activities of the skunk's own choosing. These activities range from sleeping with the owner in bed, laying on the owners lap or shoulder, playing with owner or other skunks or pets (in a larger play area than a cage), discovery of new things in the home environment, etc.

Please consider the wishes of the Oregon Skunk Owners. We undoubtedly have more experience living with and raising pet skunks than the individuals seeking to make these rules.

Please listen to what we have to say, which is in the best interests of our pet skunks. Our pet skunks thrive best when they can live in a home environment similar in many ways to that of a cat or dog.

Our pet skunks are wonderful, fascinating, intelligent, playful, and make the most loving of pets. They choose to interact with us and our other pets. They choose to sleep in our beds. They choose to follow us around. They choose to play with us. They choose to lay on our shoulders and sleep on our laps.

I got my first skunk around eight years ago. I missed out on the joys of having a pet skunk for nearly 50 years of my life before that. If the AZA standards go into effect, I will be prevented from ever having a pet skunk ever again, and I can't bear that thought. Please remove the AZA standards so that pet skunk owners can continue to have the right to own a pet skunk for as long as they shall live. She is indeed my lifes greatest pleasure.

Again, I am pleading with you to remove the AZA standards for domestically raised pet skunks.

Thank you for taking the time to listen to my plea for help.

Respectfully,

A handwritten signature in black ink that reads "Melinda Hodge". The signature is written in a cursive style with a large, stylized "M" and "H".

Melinda Hodge

lazyJranch100@yahoo.com

Home 503 468-0599

Cell (text only) 734 665-6768

RECEIVED: 5-18-16



Steve Martins Working Wildlife
14466 Boy Scout Camp Rd
Frazier Park, Ca 93225
(661) 245-2406
info@workingwildlife.com

Greetings from Frazier Park,

My name is Steve Martin. I am the owner/operator of a company called Working Wildlife. My company provides, cares for, and trains wild/exotic animals for the motion picture and entertainment industry. We have been doing so for over 40 years now. We also have a comprehensive education program that has provided thousands of live wild animal presentations with safe exotics for schools, libraries, and private events. (Please note: A DVD about our education program, as well as training reels have been included in this folder.)

Five years ago I purchased property in Selma Oregon with the intention of continuing my business in your great state.

At this point in time I have spent over \$700,000 building on this 100 acre parcel.

I have had Tom Lecroy (U.S.D.A.) and Rosemary from Oregon Fish and Game come out and inspect my new facility which I am still in the process of building.

(Please note: I have included copies of my permits and licenses that I have kept for over 40 years and are still current.)

It has come to my attention that Oregon is implementing new regulations concerning wild/exotic animal. That Oregon is attempting to restrict unlicensed private owners from keeping indigenous wildlife such as black bears and mountain lions.

I am not one of those people, and I assure you that what I do is very different. I train animals for the motion picture industry.

Please know that I am in full agreement with that, but I believe qualified licensed people like myself should be exempt from some of these regulations. There are simply too many details to cover in this letter and an open conversation about it would be more appropriate.

It is my understanding that you are considering implementation of A.Z.A. standards on all exotic animals.

A great number of these regulations would be incompatible with what we do with our animals.

I will be happy to discuss this further with you in person.

This is my dilemma:

I currently own a 60 acre ranch/training facility in Ventura County California, which I am in the process of selling. Before I can move my operation to Oregon I must first sell my property in California. I am also in the process of buying the 120 acres adjacent to the property I currently own in Selma. This property already has a nice home built. After purchase I will have a total of 220 acres which I plan on developing into a filming location ranch. This has great potential to bring considerable work and money to Oregon. Because I have been working with the film industry for over 4 decades, I have established many working relationships with all of the major film studios as well as notable producers. I cannot sell my property in California unless I am 100% guaranteed that I can move my animals to Oregon.

(Please note: I have included a list of animals that I would be bringing to Selma in this folder)

I would greatly appreciate a response and look forward to working with you all.

Best regards,

A handwritten signature in black ink that reads "Steve Martin". The signature is written in a cursive, flowing style with a long horizontal stroke extending from the end of the name.


Steve Martin



Steve Martin's
**Working
Wildlife**



Guided by a natural ability and life-long love for animals, Steve Martin began his career with wildlife 30 years ago. With over two million dollars of investment and years of hard work, Steve & Donna Martin have created a sanctuary for their family of over 100 animals, situated in California's scenic Los Padres Forest. A consultant to the major motion picture studios, Steve Martin's expertise in animal behavior is an integral part of the entertainment industry. Skills ranging from working with wildlife to setting up and directing Second Unit on animal films, his experience enables him to capture the essence of the natural world and translate it into the technical precision of the film world.



"I love working with Steve because his safety awareness frees me to create in situations that could be dangerous without the benefit of his life-long experience."

**HARA
International photography**





Members of S.A.G., Working Wildlife's professional trainers' specialities include stunt work— doubling in perilous animal scenes.

Working Wildlife boasts the only studio trained team of reindeer, and the industry's largest collection of deer, bears, cats and wolves, professionally trained, for working in controlled as well as uncontrolled environments.



Many film makers and photographers chose to work on and around our facilities' natural backdrops. Outdoor locations include: snowcapped mountains, running rivers, sagebrush country and rocky canyons.

Experienced trainers



**You may have recognized
our work in:**

**DANCES WITH WOLVES
DISNEY'S JUNGLE BOOK
MADE IN AMERICA
DISNEY'S
THE SANTA CLAUSE
CLAN OF THE CAVE BEAR
THE BEAR
NORTHERN EXPOSURE
AMAZING ANIMALS
WISHBONE
OUR CHARLEY/ZDF/
BERLIN
GRIZZLY ADAMS**

**Some of our clients
include:**

**DREYFUSS FUND
HARTFORD INSURANCE
YUBAN COFFEE
THE ESSO TIGER
KODAK FILMS
NIKON
CAMPBELL'S SOUP
TURNER BROADCASTING
DISNEY
DISCOVERY CHANNEL
CBS
WARNER BROTHERS
PARAMOUNT
FOX**

**"My sincerest hope is
that my life with
animals will provide a
window to the natural
world...allowing all
of us the opportunity to
see and appreciate
nature's most
magnificent creations.**

**My commitment to the
preservation of these
most precious of
vanishing species is to
keep the awareness of
both the danger of
their extinction as
well as share their
bountiful beauty with
generations to come."**



Steve Martin's
**Working
Wildlife**

**Steve Martin's
Working Wildlife
14466 Boy Scout Camp Road
Frazier Park, CA 93225
Call (805) 245-2406 Fax (805)245-3617**