



Comments, DNR <dnccomments@wv.gov>

Re: Wildlife Rehabilitation

1 message

Comment: [Redacted]
To: T [Redacted]

Fri, Jul 25, 2025 at 1:56 PM

Good Afternoon Teresa,

The West Virginia Division of Natural Resources would like to thank you for submitting your public comment for the proposed rule 58CSR21 - Wildlife Rehabilitation

Your comments in support of the proposed rule will be reviewed by the agency and recorded for public record.

WENDY L. GREENE, DEPUTY DIRECTOR
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WEST VIRGINIA



On Thu, Jul 17, 2025 at 4:27 PM [Redacted]

Hello, My name is Teresa Waters, and I am writing you in regard to the Wildlife Rehabilitation. December of 2024, I contacted the DNR to see how I could become a rehabber, I was informed that we do not have rehabbers in this state. I ended up talking to a MR. Whittington, who told me if I was really interested that I should get in touch with my District Senator. So, I did, I contacted Senator Brian Helton who took a great interest in it. Mr. Helton contacted other states to see how they operated their rehabilitation centers. Needless to say, he took the bill and passed! There are so many people that take care of domesticated animals but none for wildlife and I'm hoping I can help them. I love animals and I'm willing to help them. I do have a degree in vet assistant but will be taking the Basic Rehabilitation Course this fall through the IWRC. I am so excited to become a rehabber and to help all of God's creatures. I think this is a good decision for WV. I thank you so much for all that you do!!!

Thank You & God Bless, Teresa



Comments, DNR <dnrcomments@wv.gov>

Re: Public Comment on 58-21 §20-12D-3(f)

1 message

Commented on: [REDACTED] Fri, Jul 25, 2025 at 2:03 PM
To: Rebekah Perry [REDACTED]
Cc: "wendy.l.greene@wv.gov" [REDACTED]

Good Afternoon Ms. Perry Franks,

The West Virginia Division of Natural Resources would like to thank you for submitting your public comment for the proposed rule 58CSR21 - Wildlife Rehabilitation.

The agency has reviewed your comments and will incorporate significant changes to the proposed rule. Your comments will be recorded and become part of the public record.

WENDY L. GREENE, DEPUTY DIRECTOR

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WEST VIRGINIA



On Wed, Jul 23, 2025 at 7:58 AM Rebekah Perry [REDACTED] wrote:

> Below are Audy and Rebekah Perry's (Heritage Farm) comments on the legislative rules pursuant to series 21 on wildlife rehabilitation. We are overall in support of the efforts and direction the DNR has taken upon creating these rules in an effort to create a Wildlife Rehabilitation program that will be beneficial for our state's native fauna.

> The largest issue we have with this proposed rule is Section 5.9. It states that 'wildlife held for educational purposes may not be housed in the same facility as wildlife held under any other Division of Natural Resources permit that allows for possession of wildlife' as well as 'fees may not be collected to view educational wildlife'. These provisions directly prevent Heritage Farm from being able to house non-releasable native wildlife as ambassadors for their wild counterparts. Because we hold a Roadside Menagerie permit and will hold a Scientific Collecting permit, these would count as "other permits that allow for the possession of wildlife". We also collect an admissions fee to enter our village, which includes our animals and other attractions. Most any zoological institution or nature center that is not state or federally funded must do this to cover the cost of quality animal care and employees. Our suggestion is to omit section 5.9 in favor of allowing section 5.8 to suffice ("The director must provide written approval for non-releasable wildlife to be retained by a wildlife rehabilitator in accordance with W. Va. Code 20-2D-6(d))

> Our next concern is that Section 4.2 appears to be too restrictive for assistant/volunteers. Many surrounding states allow the passing of the IWRC class as the criteria for becoming a full-fledged independent wildlife rehabilitator and do not require the full CWR certification. Therefore, if we are going to require the full certification for independent rehabilitators, there will be a greater need for volunteer, intern, or assistant aid to cover the volume of wildlife in need. Another issue is that this

excludes college students seeking degree experience in wildlife rehabilitation from being able to earn that underneath a trained rehabilitator, or trainees seeking the Associate Wildlife Rehabilitator certification through the IWRC who have not yet received enough hours to take the exam. Perhaps "assistant" can be broken down into sub-permittee and volunteer. Sub-permittees able to work independently underneath of the rehabilitator must have a degree or pass that course or director-agreed-upon equivalent. Volunteers (such as students) must be under the supervision/liability of a subpermittee or the licensed rehabilitator.

> Perhaps Section 3.2.5 could change the reporting time for volunteers. Applicants probably should not be required to list volunteers at the time of application but rather with the year end report, logging all who assisted, their ages and experience/hours of service. Assistants will likely constantly be changing and difficult to cover all up front. This is also not pertinent to the individual's approval of wildlife rehabilitator status. However, they should still have to list sub-permittees on the application.

> Section 5.4 prevents Wildlife Damage Control agents from being able to bring in animals for rehabilitation. I know we discussed these persons being different from DNR agents but still not sure of the reason for this ban. What if they find injured or orphaned wildlife? This is one of the best ways wildlife rehabilitators can help ease the burden on wildlife damage control agents instead of them having euthanasia as the only alternative to leaving something to die. Is the reasoning because they have been identified as "nuisance" animals? Just wondering.

> Section 5.7 We are unsure why the limit on transfer to a facility with more room is capped at 24 hours. This could be a beneficial allowance to have at any point in the process of care and would be properly documented in reporting.

> Section 5.11 is not necessary. The minimum standards guidelines for sanitization suffices for all taxa. This protocol cited is meant for field equipment. Reptiles can be handled with the same level of care as other classes set forth by the IWRC. Box turtles are likely to be the only consistent reptiles served.

> Section 6.2 is too restrictive for the temporary confinement of rehabilitation, especially for neonate care. Double-walled or fenced enclosures would be too expensive and are not even required of the USDA for RVS species that are not otherwise classified by them as Dangerous. And even still, the double walled enclosures are only mandatory for permanent public exhibition. Most RVS patients would be held inside of a cage that is inside of a facility building anyways, which is essentially a double barrier. Only individuals in "pre-release" enclosures outside would not have a double barrier, but IWRC minimum standards for enclosure guidelines should suffice for pre-release and permanent enclosures.

> Sections 6.7 & 6.8 do not consider the dangers of habituation by keeping orphaned wildlife in captivity past their weaning stage. These restrictions may cause more animals to be deemed non-releasable. They should only pertain to RVS showing any signs of illness, not ones that are simply orphaned or injured.

> Section 6.5 the "Rabies Control Zone" is not defined.

> Minor little typo - section should be "58"-21-3 instead of "20"-21-3

Thank you for your excellent work on crafting these draft rules. We know how hard it is to think of all the various intricacies of their implication and look forward to discussing these further with you.

Rebekah Peirce Franklin