

**From:** Anna Reams  
**Sent:** Friday, November 1, 2024 8:49 PM  
**To:** Wildlife WHL Rehab [RehabWildlife@wildlife.ca.gov](mailto:RehabWildlife@wildlife.ca.gov)

**Subject:** Comments on 679 regulation

Hi all, These may have already been addressed but if not here they are.

Table 7 1c

The max number of coyote juveniles should be at least a litter which can be 9

table 7 3A

The max number of Opossums should be litter size which can be 10

Table 8 1A

Crows will damage any soft netting creating a safety hazard within the aviary (getting caught)

Double door entry...a little overkill can this be heavy screening hung in the doorway for crows?

Can Floors be aviary hardware cloth covered with natural materials such as soil,  
pine needles, etc?

Table 8 (5A)

Roadrunners should have another perch at least 6-8 feet above the second perch or stump as they perch high off the ground at night and for safe escape.

Thank you  
Anna

*Anna Marie Reams  
Director,*

*Wildlife Care of SoCal*

[www.wildlifecareofsocal.org](http://www.wildlifecareofsocal.org)

<https://wildlifecareofventura.org/donate/>

Wildlife Care of Southern California/Facebook

*Formerly (Wildlife Care of Ventura County)*

*City of Simi Valley, State, Federal and USDA permits*

**From:** Sharron Baird

**Sent:** Tuesday, November 19, 2024 1:05 PM

**To:** Wildlife WHL Rehab [RehabWildlife@wildlife.ca.gov](mailto:RehabWildlife@wildlife.ca.gov)

**Subject:** My changes to manual

Chapter 1, pg. 8, (f) Wildlife Rehabilitation List of Persons

(3) Subpermittee

I have real issues with the wording of 'without supervision'. It should read WITHOUT DIRECT SUPERVISION. You want them supervised, otherwise why be a subpermittee? And why would a permitted person want someone under their permit unsupervised? People say they can always require supervision but they can't. It is in the manual without supervision and any volunteer can take that up that it is written that way and they don't need supervision.

(7) No licensed veterinarian, giving their time and services free is going to take an exam on wildlife. Most home rehabbers don't have vets that are wildlife vets. We have vets willing to see animals but count on us to help with care and tell them what is necessary.

Chapter 2

3 Remember, not all cages have posts. They are wire panels clipped together.

5-Rabbit. It says to line cage with shade cloth, wood, etc. If cages are 'lined' with these items the rabbits will eat them. Even if put on the outside of the cage they will eat them, but lining a cage is not good for the rabbits.

Ground squirrels will eat wood panels. Might be good for the squirrel's teeth but not for the rehabber's pocketbook.

4- wire buried in ground. This is not necessary if the cage has an attached wire bottom. Either/or buried in ground of attached wire bottom

p. 28 Tree Squirrels.

1/2" x 2" is perfect. They need to be able to get toe holds in the wire.

Why give specific number of branches? Most home rehabbers have to hunt for branches, especially in the cities. Or give a range, or just say a couple of branches.

p. 30 Rats

Kangaroo rats and most other rats prefer to make a burrow than to have a hidey box. My hidey boxes slowly disappear under the substrate...

Table 7

Ground squirrels are communal and often come in large numbers. If a whole litter is found you will have 7-10 siblings. We are not going to split them up in a cage. They like numbers.

This is all I have had time to go through at the moment.

My concern is that instead of being a guide this is telling people specifically what they have to do. The health and development of the animal needs to be considered but most importantly the expertise of the rehabilitator. We have already be screened by DFW and deemed capable of taking care of these animals. Let us do our jog. When an inspection is done they don't have to count the branches in a cage but see if the animal is in a suitable habitat for the short time they are in it.

Once again I want to mention that an authorized person taking baby squirrels is going to have them up to four months when they are ready to go in a pre-release cage, not 30 days. In busy baby season I don't want the animals put through the stress of getting caught, packed up and driven to my house so I can just send them back to the AP to finish their job. I am in contact with my AP's 3-4 times a week. I know how the babys are doing.

Sharron

**From:** Pamela Turner

**Sent:** Wednesday, November 13, 2024 3:09 PM

**To:** FGC <FGC@fgc.ca.gov>;

**Subject:** Comments on the Draft Native Wildlife Rehabilitation 679 Regulations Manual

Dear Sir or Madam:

Thank you for this opportunity to comment on the Draft Native Wildlife Rehabilitation 679 Regulations Manual. I have been a volunteer wildlife rehabilitator for over twenty years, and although I have worked with many species, my specialty is the rehabilitation of crows and ravens.

I have one general comment on the pre-release conditioning enclosure requirements for birds (Table 2). The rest of my comments focus on the particular needs of crows and ravens.

--Table 2 says that the flooring of aviaries must either be of concrete, or have walls buried 1 foot deep and 1 foot inward at a 90 degree angle to prevent animal ingress by digging. My home aviary is constructed with a 1"x1" metal wire flooring covered by 4 inches of pea gravel. I also know of home aviaries with solid wooden floors. Please consider wire and wood variations on aviary flooring, which accomplish the goal of preventing ingress by burrowing animals just as well as concrete or buried wall material.

--The minimal enclosure size requirements for ravens are insufficient. Crows and ravens are lumped together in Table 9, as if they are similar sized birds, with similar enclosure needs.

--A minimal neonate enclosure for crows and ravens is set at 10" wide and 5 " high. While this size might (barely) fit the maximum of 4 neonate crows, it would in no way be sufficient for 4 neonate ravens. Generally, ravens are about 3 times the size and weight of crows at a similar stage of development.

--The minimal juvenile and adult aviary enclosure is the same for both crows and ravens (max of 6 birds), despite the size difference between crows and ravens. At 20'x8'x8', the minimum enclosure size for crows and ravens represents 1,280 cubic feet of space.

--This minimal enclosure space is only **17%** of the space deemed appropriate for red-tailed hawks (the minimum of 50'x12'x12' for red-tails equals 7,200 cubic feet). Yet red-tails and ravens are similar-sized birds: red-tails are 45-69 cm in length, compared to 56-69 cm for ravens, red-tails weigh 690-1460 g, compared to 689-1625 g for ravens, red-tails have a wingspan of 114-133 cm compared to 116-118 for ravens. (Size data from the Cornell Bird Lab's "All About Birds" website).

--Ravens, particularly juvenile ravens, are preyed upon by red-tailed hawks something I have witnessed first-hand. As noted in Table 4, the pre-release conditioning enclosure is "intended for each animal to display the natural behaviors required of that species to survive in the wild such as flying, swimming, *predator avoidance*, hunting and foraging" (emphasis mine). Without a sufficiently large pre-release enclosure, juvenile ravens are highly unlikely to have the flying skills they need to survive upon release.

--I respectfully suggest that crows and ravens be given separate consideration, and that the minimum enclosure requirements for ravens be similar to the requirements for red-tailed hawks.

Thank you for your kind consideration of these comments.

Regards,

Pamela Turner

**From:** Kat McGowan

**Sent:** Friday, November 18, 2024 11:23 AM

**To:** Wildlife WHL Rehab [RehabWildlife@wildlife.ca.gov](mailto:RehabWildlife@wildlife.ca.gov)

**Subject:** Comments on the Draft Native Wildlife Rehabilitation 679 Regulations Manual

Thank you for this opportunity to comment on the proposed updates to the Wildlife Rehabilitation 679 Regulations Manual.

I have worked at two California wildlife rehabilitation hospitals as a volunteer wildlife rehabilitator over a period of 10 years. I specialize in corvids and raptors.

I'd like to comment on the requirements for pre-release conditioning enclosures (Table 2).

It specifies that the flooring of aviaries must either be of concrete, or have walls buried 1 foot deep and 1 foot inward at a 90 degree angle to prevent animal ingress by digging.

Although I do not have an aviary of my own, I have cared for birds in multiple aviaries in satellite facilities and in hospital environments with well-constructed and well-maintained wood flooring, and found these to be entirely adequate at preventing predator access, as well as effectively excluding pests attracted to food. In addition, they're safer for juvenile birds who are still learning to fly. Please consider including well-maintained waterproofed wood flooring as an option for rehab aviaries.

Secondly, I'd like to note that crows and ravens have dramatically different needs, due in large part to size and social requirements. Currently, the regulations specify that the minimal juvenile and adult aviary enclosure is the same for both crows and ravens (max of 6 birds), despite the substantial size difference between crows and ravens.

Ravens are roughly the same size as red-tailed hawks, and require ample space in order to develop the skill and strength to fly. Red-tails are 45-69 cm in length, comparable to 56-69 cm for ravens, red-tails weigh 690-1460 g, compared to 689-1625 g for ravens, red-tails have a wingspan of 114-133 cm compared to 116-118 for ravens. (Size data from the Cornell Bird Lab's "All About Birds" website).

Red-tailed hawks are allotted 7,200 cubic feet in rehabilitation. At 20'x8'x8', the minimum enclosure size for crows and ravens represents 1,280 cubic feet of space. While this may be adequate for crows, it is not sufficient for ravens. Please consider increasing the minimum size requirement for ravens so that they are adequately prepared for release.

Thank you for your consideration.

Kat McGowan

**From:** Cynthia Myers  
**Sent:** Friday, November 22, 2024 7:31 AM  
**To:** Wildlife WHL Rehab [RehabWildlife@wildlife.ca.gov](mailto:RehabWildlife@wildlife.ca.gov)

**Subject:** Comments re: Udated Draft of DFW 679 Regulations Manual

Hello,

I have a few comments below about the current draft that you sent out earlier this month. This version without all the strike-outs and other mark-ups was easier for me to navigate and understand, so much appreciated.

Thank you all for the ongoing opportunity to review and submit comments or suggestions,

Cindy Myers

Rainbow CA

San Diego Humane Society/PW

Education/bat team volunteer

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- Page 8, Table 2, (4) – For Authorized Person, should it say “direct supervision” or just “supervision?” Wondering what exactly “direct supervision” would entail for an inspecting CDFW officer. Telehealth is provided as an example, so perhaps that would be clear to an inspecting officer.
- Page 25, Table 6, (2) –
  2. a and b – We would still be required to have at least 1 solid wall or equivalent in every flight enclosure for bats? If b. was changed to an “or” at the end, that would allow the wire mesh on all 4 walls, rather than requiring a solid wall for at least ¼ of the wall area. Not sure why bat enclosures are required to have solid wall area when I don’t see such a requirement for comparably sized birds, the word “or” allows more flexibility to meet the same goal.
  7. The sand reference should be listed as c. included in 6. above for floors, not under 7. for enrichment.
    - a. The hide box dimensions for length and height should not be “up to” but should state “at least” 6 inches long and high. The minimum depth of 2” is fine, but most bat boxes are wider and taller than 6”, even the small ones sometimes built to hang in bat pre-release enclosures.

(2) Chiroptera	(A) All Bats	<p style="text-align: center;"><small>This requirement is intended to allow each animal claw and dig its way in.</small></p> <ol style="list-style-type: none"> <li>1. Enclosures shall have a double-door entry system that is closed and secured at all times. [Note: This requirement is intended to prevent animal escape by flying.]</li> <li>2. Walls shall be constructed of either or a combination of the listed materials:           <ol style="list-style-type: none"> <li>a. Wood panels covering at least 1/4 and up to 1/2 of the wall area; or</li> <li>b. Plastic panels covering at least 1/4 and up to 1/2 of the wall area; and <del>or</del></li> <li>c. Wall area not constructed of wood or plastic shall be constructed of coated polyvinyl chloride (PVC) or welded wire mesh with a mesh size no larger than 1-inch x 0.5-inch.</li> </ol> </li> <li>3. Wall and roof material shall be affixed to posts consisting of one of the listed materials:           <ol style="list-style-type: none"> <li>a. A minimum of 2-inch x 4-inch wood fence posts; or</li> <li>b. A minimum of 2-inch diameter metal fence post.</li> </ol> </li> <li>4. Interior walls shall be covered with either polycarbonate vinyl or polypropylene plastic mesh with mesh size no larger than 1/6 inches x 1/6 inches. [Note: This requirement is intended to prevent injury to each animal.]</li> <li>5. Roof shall be constructed of either. [Note: This requirement is intended to provide shelter for each animal.]:           <ol style="list-style-type: none"> <li>a. Wood covering at least 1/4 and up to 1/3 of the roof area; or</li> <li>b. Plastic covering at least 1/4 and up to 1/3 of the roof area; or</li> <li>c. Metal covering at least 1/4 and up to 1/3 of the roof area; and</li> <li>d. Roof area not constructed of wood, plastic, or metal shall be constructed of fiberglass netting or similar soft net material.</li> </ol> </li> <li>6. Floors shall be constructed of either. [Note: This requirement is intended to prevent injury to each animal.]:           <ol style="list-style-type: none"> <li>a. Concrete covered with carpet, mat, or other soft material; or</li> <li>b. Soil; or</li> </ol> </li> <li>7. Non-abrasive sand. Enclosure shall have the following enrichment: [Note: This requirement is intended for each animal of a cavity or crevice dwelling or foliage roosting species to be fully hidden and to climb, hang, or roost at will.]:           <ol style="list-style-type: none"> <li>a. 2 hide boxes or sheltered retreat with dimensions of up to 6 inches x 2 inches x 6 inches (L x W x H), or cloth pouch, placed a minimum of 5 feet high above the floor; and</li> <li>b. 2 tree branches at least 3 feet long with a minimum diameter of 0.5 inches with artificial or natural leaves and secured from the ceiling.</li> </ol> </li> </ol>
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