

# Lindsay Wildlife Experience



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**Peter Flowers**

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**Recipient Name**

California Fish and Game Commission  
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I am writing to express concerns over the proposed timeline for the regulatory changes concerning wildlife rehabilitation.

As you know the regulatory framework governing wildlife rehabilitation in the state has not changed for many decades and the standards set by the 2020 National Wildlife Rehabilitation Association is now 25 years old.

Permitted wildlife rehabilitators operate on a non-profit basis, making it a challenge to ask all of them in the state to comply to the currently proposed adoption date of April 1, 2025.

It is a laudable goal to bring rehabilitation standards to a 21st century standard and ensure that wildlife is being treated with compassion at the best levels of care. It is my belief that without a more gradual rollout to allow rehabber to adjust that wildlife care may be severely impacted across the state due to the financial and space obligations required to come into compliance.

While the process has been ongoing for about a year, in its current form it is not ready for roll out and there is still much disagreement over finding a balance between acceptable rehabilitation standards and housing that more closely resembles requirements for permanent captivity. Wildlife rehabilitation is a system more focused on not only healing from injuries but also ensuring the wild nature of the animal and moving them out as soon as possible since the risk of additional injury in captivity is greatly increased over animals that spend their lives in captivity. To this end the proposed regulations do not adequately take the nature and natural behaviors into account. This will require fundamental changes to what has currently been proposed.

The current structure of the proposed regulations appear to be geared toward a variance based system for those that do not exactly meet the requirements which on its face would seem to undermine the idea of well written regulations that allow for individual species variations. CDFW will likely be overwhelmed with these requests based on their current staffing and what is the point of having regulations if the majority is under a variance. This seems to speak to adjustments being needed in the regulations themselves.

If wildlife rehabilitators are unable to adjust, then many may be forced to close or at best be forced to severely reduce their abilities and capacities. This will lead to increases in unnecessary euthanasia or even in placing wildlife into the hands of inexperienced well-meaning unpermitted members of the public as they will feel they have nowhere to turn.

Lindsay Wildlife Experience prides itself on being one of the first wildlife rehabilitators in the nation that predates the existence of state or federal permitting. We set the standards of the time and our

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record speaks for itself to this day. We want to participate in the creation of wildlife rehabilitation standards but strongly believe that this is happening to fast and a period of adjustment is badly needed.



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