# **EXHIBIT L-1**

October 30, 2014



## Temporary Rule-making for Captivity Licenses and Permits Summary of Public Comments

Proposed Amendment	<b>Position Count</b>	Comment Types
<ul> <li>allow the Commission to issue new captivity licenses and permits for the purpose of holding cervids in captivity.</li> <li>allow certified herd owners to sell or transfer cervids to any other licensed facility.</li> <li>increase the age of mandatory Chronic Wasting Disease (CWD) testing from six months to 12 months.</li> </ul>	8 = Agree 1,968 = Disagree (total includes two petitions, see Appendices A and B)	32 = Comment card 1,944 = Letter/e-mail

Public hearings were held on October 7, 2014 in Statesville and October 14, 2014 in Raleigh. Fifty-one people completed comment cards, 19 of whom made no comment.

In addition to the individual comments tallied, and petitions included in Appendices A and B, the Commission received the following letters representing organizations:\*

- 1) Opposed to the temporary rule amendments that would allow new captive cervid licenses. North Carolina Wildlife Federation, signed by Tim Gestwicki, CEO
- 2) Opposed to the temporary rule amendments that would allow new captive cervid licenses and relax CWD testing requirements.
  - North Carolina Chapter of the Wildlife Society, signed by Gary Marshall, Executive Board at Large
- 3) Opposed to the temporary rule amendments that would allow new captive cervid licenses. North Carolina Camo Coalition, signed by Richard Hamilton, Coordinator
- 4) Opposed to captive cervid facilities. Piedmont Wildlife Club, signed by Wallace Chambers, President
- 5) Opposed to the temporary rule amendments that would allow new captive cervid licenses and relax CWD testing requirements.
  - The Humane Society, signed by Kim Alboum, N.C. State Director

<sup>\*</sup>complete letters provided electronically

#### APPENDIX A

*The following e-mail was sent by 252 individuals:* 

### Dear Wildlife Regulations:

I am a strong supporter of setting wildlife management policies and rules on the basis of the best available scientific evidence. The evidence we have today on the risk captive deer herds present to wild deer through the spread of disease, especially and most recently, Chronic Wasting Disease (CWD), clearly indicates a link between captive deer facilities and the movement of deer associated with the trade in captive deer and the likelihood of introduction of CWD into wild deer herds.

This Spring (2014), the WRC convened a panel of experts with wildlife disease experience from universities and from state and federal government; of representatives from non-government organizations including the NC Wildlife Federation, Quality Deer Management Association, NC Deer Farmers Association, National Deer Farmers Association, Boone and Crocket; and of stakeholders representing all aspects of the captive deer spectrum from deer hunters to deer farmers. This Task Force on Captive Deer Diseases, which worked over a three month period with three full day meetings. A compendium of valuable information was generated and all points of view were recorded in the Final Report of the Task Force. Doesn't it seem premature to take this proposed action to increase the number of captive deer facilities before this information can be presented to the General Assembly and all other interested parties?

Some people, especially those associated with operation of captive deer facilities, will claim that the risk of CWD introduction of a single deer pen is low, so low that you can ignore it and expand the number of deer pens without too great a risk. I disagree. Any additional risk is too high at this time when CWD is running rampart across North America. CWD is decimating wild deer herds and deer hunting in many states at this time. Some of these states are close by, too close for comfort. Pennsylvania, West Virginia, Maryland, and Virginia all have recorded CWD in their wild deer. The suspected or proven culprit in each case is an infected deer imported from a captive deer facility. This fact alone is sufficient to put the brakes on this impetuous rush to increase the number of deer farms in North Carolina.

If CWD invades NC, the landscape of deer management and deer hunting will be changed forever. The disease cannot be eradicated; no positive test will detect CWD in live animals, symptoms do not show in infected animals until later life due to its long incubation period, the causative agent survives for years under the most adverse conditions, death of the infected animal is the inevitable end, efforts to control the spread of CWD are seldom successful, and the cost of CWD is an immense amount of sportsman money, which must be diverted from other important wildlife management programs.

Our wild deer population in NC supports a huge economy important to small local businesses and provides outdoor recreational opportunities to 260,000 deer hunters and many more outdoor enthusiasts who admire the white-tailed deer in its natural habitats. The white-tailed deer is the foremost recognized and popular member of the wildlife community in NC. No small risk to introduce CWD into NC for the meager benefit of a few commercial deer farmers is worth this gamble.

I am opposed to the proposal to expand the number of deer farms in NC.

#### APPENDIX B

*The following e-mail was sent by 1,525 individuals:* 

I am submitting these comments in opposition to the proposed rules regarding captive cervids. As a North Carolina resident, I believe that removing the moratorium on captive breeding ranches would greatly increase the risk of bringing chronic wasting disease into our state -- placing our wild deer in serious danger.

Captive deer ranches breed animals with abnormally large antlers to sell to captive or "canned" hunts. Captive hunts offer visitors "no kill, no pay" opportunities to shoot a trophy animal.

Our wildlife management system is founded on the principle that wildlife belongs to all of us, and these deer breeding ranches directly contradict that.

The unnatural high densities that characterize these facilities create breeding grounds for disease. Chronic wasting disease has already been found in 22 states -- including neighboring Virginia -- and is frequently associated with captive facilities.

We should be trying to crack down on this industry, rather than expanding it.