

Domestic dogs cross bred to wolves, more commonly known as wolf-dogs, are **considered unvaccinated** even if they have received the rabies vaccine, according to the Center for Disease Control (CDC), the U.S. Department of Agriculture (USDA), and the American Veterinary Medical Association (AVMA). The Compendium of Animal Rabies Prevention and Control 2016, produced annually by the National Association of State Public Health Veterinarians (NASPHV), states, “The safety and efficacy of parenteral rabies vaccines in wildlife and wild animal hybrids have not been established, and no rabies vaccines are currently licensed for use in these animals. Thus, any use of rabies vaccines in these animals is considered extra label use. Zoos or research institutions may establish vaccination programs in an **attempt to protect** valuable animals, **but these should not replace appropriate public health activities that protect humans.**”

Larimer County Code requires, “The owner of each dog or cat which is four months of age or older shall cause said dog or cat to be vaccinated against rabies. Such vaccination shall be repeated thereafter as required by the serum.” The World Health Organization (WHO) remarks on their March 2017 Fact Sheet, “Since 1983, countries in the Region of the Americas have reduced the incidence of rabies by over 95% in humans and 98% in dogs. This success has been achieved mainly through the implementation of effective policies and programs that focus on regionally coordinated dog vaccination campaigns, raising public awareness, and widespread availability of PEP (post-exposure prophylactic).” The requirement for residents of Larimer County to vaccinate their animals is part of the international progress being made to eradicate rabies. Many states, counties, and cities ban wolf-dogs citing, as one of the reasons, the inability to vaccinate this “breed” against rabies presenting a health risk to the public. Introducing thirty to sixty unvaccinated wolf-dogs into our community, which is an area where rabies is endemic, will potentially increase the risk of spreading this virus in our area. It would be judicious for the Larimer County Commissioners to recognize the significance of placing our region in a vulnerable position further enhancing our potential for exposure to rabies and diminishing the progress created by effective policies.

On October 7, 2009, the Colorado Department of Public Health and Environment (CDPHE), issued the Rabies Prevention and Control Policy (Recommendations for Hybrid Wolves Regarding Vaccination, Bite Follow-Up and Exposure to Rabies) in response to the difficulty presented by the absence of “objective tests or methods to determine if an animal is a hybrid”. However, this argument is no longer valid, since the UC Davis Veterinary Medicine’s Veterinary Genetic Laboratory wolf-hybrid test can now detect hybrids within three generations. The policy does state that, “The establishment of rabies in skunk, raccoon or other wild mammal populations in an area increases the risk of a wolf-hybrid incubating rabies after exposure to a wild mammal in Colorado.” This further indicates that it would be in the best interest of our community and the wolf-dogs for W.O.L.F. to seek a less rabies prone location.

The CDPHE Rabies Prevention and Control Policy, offers a Consent For Rabies Vaccination of a Wild/Domestic Canine Hybrid form, which states, “... I understand the following information with regard to this use of the vaccine: ... My veterinarian, the rabies vaccine manufacturer and distributor(s), and the Colorado Department of Health have made no representations, warranties or guarantees as to the effectiveness of the vaccine.” No veterinarian can guarantee the effectiveness of the rabies vaccination in a wolf-dog as there is “a lack of scientific studies proving they are effective in preventing rabies in hybrid-animals.”

Colorado supports two other wolf and wolf hybrid sanctuaries; Mission: Wolf and Colorado Wolf and Wildlife Center (CWWC). Mission: Wolf is in Huerfano County; its nearest city is Westcliffe in Custer County. According to the CDPHE record of [Lab Confirmed Rabies Positive Animals](#), Huerfano County has had **zero cases** of rabid mammals between 2013 and 2016. In Custer County, **one bat** in 2014 and **one bat** in 2015 tested positive for rabies. CWWC is near Divide in Teller County. Between 2013 and 2016, only **one bat** tested positive for rabies in 2015. These facts are in stark contrast to the environment in Larimer County.

The CDC forewarns, “That **captive mammals that are not completely excluded from all contact with rabies vectors can become infected.**” W.O.L.F.’s enclosures will not exclude their animals from contact with infected wildlife. Larimer County consistently ranks among the highest incidences of confirmed cases of rabies in the state each year. According to the CWWC, **twelve rabid bats** were identified in Larimer County in 2016. This was the second highest number of rabid mammals found in any county, out of eighty-eight that tested positive in the State of Colorado. **Fourteen bats** tested positive for rabies, in 2015, second highest number of mammals only to Boulder County but the highest number of rabid bats by a significant margin. In 2014, **one skunk** and **eight bats** were determined to be positive for the rabies virus. However, in 2013, there was a considerable upsurge in the rabid population, **fifty-four rabid mammals** tested positive in Larimer County; **ten bats, thirty-five skunks, three raccoons, four foxes, one horse, and one cat**. This number was twice as many than any other county in the state which had a total of one hundred ninety-one lab confirmed rabies positive animals. Bats have small teeth and claws, it is possible for humans and animals to be bitten or scratched and not realize it. “Any animal bitten or scratched by either a wild, carnivorous mammal or a bat that is not available for testing should be regarded as having been exposed to rabies,” advises the CDC. The wolf-dog enclosures will offer no protection from our community’s primary rabies host. Larimer County is clearly a poor choice for a wolf or wolf-dog sanctuary considering the inability to verifiably protect the animals from endemic rabies in this region. It is a health risk not only to the wolf-dogs but to our natural wildlife, pets, livestock, and its residents.

On May 15, 2017, Colorado Department of Public Health and Environment (CDPHE) released an article cautioning that two pet dogs have recently tested positive for rabies. “They (Colorado) have not had a contracted in-the-state canine rabies case since 1974,” said Veterinarian Kristina Ingram. A skunk had scratched the Australian shepherd mix and killed another puppy in Weld County. The CDPHE advises that to avoid rabies, **don’t leave pet food outdoors**. W.O.L.F. feeds their animals raw meat in their outdoor enclosures and dry kibble is available at all times. This practice will draw wildlife to the enclosures. The [Compendium of Animal Rabies Prevention and Control 2016](#), warns that stray and feral cats serve as a significant source of rabies exposure risk. Our community has many barn cats and a fair share of feral cats that wander through our mountains. These small animals and others will be drawn to the prospect of a tasty meal. Between 1990 and 1996, in areas where raccoon rabies was enzootic, groundhogs accounted for 93% of the 371 cases of rabies among rodents reported to the CDC. Groundhogs will not be hindered by chain-link fencing and will enter the enclosures at will. The CDPHE also advises to **keep pets inside at night**. Of course, all of the wolf-dogs will remain outdoors at all times, subjecting them to exposure to rabid hosts. In Larimer County residents, pets, and livestock have an elevated risk of exposure to rabies due to our wildlife, as is indicated by the CDPHE’s and CDC’s lab confirmed rabies positive animals. “When the family dog or cat gets rabies, there’s an increased risk of exposure to people,” said Colorado Public Health Veterinarian, Jennifer House.

It has been documented with the National Center for Biotechnology information, U.S. National Library of Medicine, that in March 1993, an eleven-month-old wolf-dog was determined to have rabies. The animal was currently vaccinated for rabies with a USDA-approved canine rabies vaccine. One month prior to becoming ill, the animal was observed carrying a dead skunk in its enclosure in a rabies-endemic foothills region of northern California. Seven people required rabies post-exposure prophylactic treatment.

“The regulations governing the licensing of rabies vaccines require that the product be shown to be effective in each species for which it is recommended. Without knowledge of the behavior of rabies vaccines in wolves, we cannot allow a manufacturer to recommend the product in that species.” Robert B. Miller, Chief Staff Veterinarian, Plant Health Inspection Service, USDA. In September 1999, the USDA-APHIS proposed to amend the rule allowing licensed vaccines labeled for use in dogs to be licensed and labeled for use in wolves and wolf hybrids. This was in response to a petition submitted showing that more than six hundred wolves and wolf-dogs had been vaccinated with vaccines licensed for dogs, without any reported adverse reactions. The CDC acknowledges that the vaccine is safe in multiple species; however, it is the **effectiveness** of the vaccine that is undetermined and a risk to public health. In September of 2000, the AVMA House of Delegates supported the recommendation by the Council in Biologic and Therapeutic Agents opposing the proposed 1999 amendments. After the proposal was withdrawn, Dr. Bonnie V. Beaver, a member of the AVMA Executive Board, said, “This Proposal could have had a significant, negative effect on public health by eliminating the USDA’s own requirement of proving rabies vaccine efficacy through direct virus challenge.”

Rabies serology cannot be used instead of vaccination. “Rabies virus titers (the concentration of an antibody) are indicative of a response to vaccine or infection. Titers do not directly correlate with protection because other immunologic factors also play a role in preventing rabies, and our abilities to measure and interpret those other factors are not well-developed. Therefore, evidence of circulating rabies virus antibodies in animals should not be used as a substitute for current vaccination in managing rabies exposures or determining the need for booster vaccinations,” NASPHV Compendium of Animal Rabies Prevention and Control 2011.

Rabies is a fatal virus and a serious public health problem. All mammals are believed to be susceptible to the disease and the virus is shed in the saliva of an infected animal through bites and scratches. Wolf-dogs are considered unvaccinated and the CDC has determined that, “Signs of rabies among wildlife cannot be interpreted reliably; therefore, any such animal that exposes a person should be euthanized as soon as possible and the brain should be submitted for rabies testing.” Furthermore, “The offspring of wild animals crossbred to domestic dogs and cats (wild animal hybrids) are considered wild animals by the National Association of State and Public Health Veterinarians (NASPHV) and the Council of State and Territorial Epidemiologists.” The Rabies Prevention and Control Policy created by the CDPHE states that, “**If the biting animal (hybrid-wolf) originated from an area where terrestrial mammal rabies is endemic**, has been exposed to a rabid animal or known rabies host (bat, skunk, raccoon) in the previous 6 months, was a stray, is ill ... **euthanasia and testing would be required**. Current rabies vaccination alone is not a sufficient criterion to quarantine a hybrid-wolf involved in a human bite.” Mission: Wolf and the CWWC are being operated in environments which do not jeopardize their animals’ welfare and lives. The Livermore location chosen by W.O.L.F. is reckless and unnecessarily places the animals and community at risk.