

## Burgos, Alexander N

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**Subject:** FW: Request for Readoption Extension  
**Attachments:** ReqForExtension\_15ANCAC10G.0400-MRCsigned.pdf

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**From:** Ruhlman, Carrie A <[carrie.ruhlman@ncwildlife.org](mailto:carrie.ruhlman@ncwildlife.org)>  
**Sent:** Tuesday, December 19, 2023 11:07 AM  
**To:** Rules, Oah <[oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)>  
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**Subject:** Request for Readoption Extension

Attached please find a request from the NCWRC for an extension of the readoption deadline for the 15A NCAC 10G .0400 Rules. Please let me know if you have any questions.

**Carrie Ruhlman**  
Policy Development Manager

**N.C. Wildlife Resources Commission**  
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## ◊ North Carolina Wildlife Resources Commission ◊

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Cameron Ingram, Executive Director

December 19, 2023

Ms. Jeanette Doran, Chair  
Rules Review Commission  
c/o Seth Ascher, Commission Counsel  
Office of Administrative Hearings  
[seth.ascher@oah.nc.gov](mailto:seth.ascher@oah.nc.gov)  
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**VIA ELECTRONIC MAIL**

**Re: Request for Extension of Readoption Deadline for Period of Review of Rules  
15A NCAC 10G .0401, .0402, .0403, and .0405**

Dear Madam Chair:

The Wildlife Resources Commission (WRC) is requesting that the Rules Review Commission, pursuant to its authority under NCGS 150B-21.3A(d), grant a 12-month extension of the readoption deadline for the 15A NCAC 10G .0400 Rules, from December 31, 2024 to December 31, 2025.

The WRC has been working diligently over the past five years to meet the deadlines imposed by the periodic review process. At this point, the agency has successfully reviewed and readopted all but eight of its 277 rules, having met all requirements in G.S. 150B-21.3A(c). Because the Commission understands the value and importance of evaluating its codified rules, the interest that the public has in many of the activities it regulates, and the impact of many rules on its constituency, the agency decided in 2017 to readopt all codified rules in Title 15A Chapter 10 of the North Carolina Administrative Code instead of just those classified as “necessary with substantive public interest.” From that point on, the WRC classified all rules as “necessary with substantive public interest” during Step 1 of the review process with full intentions to update and readopt all rules.

In addition to the periodic review of rules, the WRC also amends, and updates rules related to hunting, fishing, and trapping seasons and bag limits, and game land use on an annual basis. Considering the workload created by this process and the requirements of the periodic review,

the above-identified rules were scheduled for re-adoption by December 31, 2024. However, at the time that this deadline was negotiated, no major changes to these rules were anticipated.

The 10G .0400 Rules pertain to Wildlife Service Agents, individuals and businesses authorized by the WRC to sell licenses and permits, and process applications and vessel registrations (G.S. 113-270.1). The Commission has had Wildlife Service Agents since 1947 and currently has over 900 throughout the State.

When these rules were initially adopted in 1997, the WRC and its Wildlife Service Agents were issuing hand-written paper licenses. From that point, the rules were amended as new technology and point-of-sale licensing systems were implemented. In 2005, the agency went live with its first web-based licensing system ALVIN (Automated License and Vessel Information Network). A year after implementation, the agency drafted rules to address issues and concerns with Agents brought about by real-time, web-based licensing.

On July 1, 2023, the WRC launched a new, custom licensing system and mobile app, Go Outdoors North Carolina. Unlike the previous system, which was developed in-house, Go Outdoors North Carolina was developed by a 3<sup>rd</sup> party company. The development of this system has been ongoing since 2022, as has the transition to the system and transfer and integration of all accompanying data from ALVIN, Wildlife Service Agents, and Law Enforcement. At this time, the system and system processes that could affect Wildlife Service Agents remain under development. Thus, the agency would like to ensure a full year of implementation, as it has in the past, before modifying rules that impact individuals who are using the system.

The WRC remains dedicated and committed to the periodic review process and the agency is prepared to meet the re-adoption deadline agreed upon for the 10G .0400 rules if this request is not granted. However, in the interest of good policy development and in the spirit of the periodic review laws, the WRC Commissioners unanimously agreed at a December 2023 special meeting, that extending the re-adoption deadline by 12 months would help the agency better serve its Wildlife Service Agents and constituents, as revising these rules that address the business needs of the agency and our Agents without a full year of implementation would be premature.

Based on the above, the WRC respectfully requests an extension of the re-adoption date for 15A NCAC 10G .0401, .0402, .0403, and .0405 to December 31, 2025. If you have any questions, please do not hesitate to contact the WRC Executive Director, Cam Ingram at [cameron.ingram@ncwildlife.org](mailto:cameron.ingram@ncwildlife.org) or (919)707-0151, or the agency Rulemaking Coordinator, Carrie Ruhlman at [carrie.ruhlman@ncwildlife.org](mailto:carrie.ruhlman@ncwildlife.org) or (919) 707-0011.

Sincerely,



Monty R. Crump, Chairman  
Wildlife Resources Commission