



June 3, 2013

MR. CARMEN A. TRUTANICH
City Attorney □
City Hall East □
200 N. Main Street
Room 800
Los Angeles, CA 90012

RE: Council File No. 12-1147
REVISED DRAFT ORDINANCE AMENDING THE SPAY/NEUTER EXEMPTIONS AND
BREEDING PERMIT PROVISIONS, REQUIRING THE STERILIZATION OF IMPOUNDED
STRAY UNALTERED DOGS AND CATS, AND DELETING REFERENCE TO THE
SPAY/NEUTER ADVISORY COMMITTEE

Dear Sir:

Regarding the proposed changes referenced above, we have the following comments and objections to what has been proposed.

RE: (1) Subsection (b)(2)A of Section 53.15.2

Until VERY recently, the American Kennel Club/AKC did not provide conformation classes for animals younger than six (6) months old. I believe that the United Kennel Club/UKC, as well as other breed specific registries, had/have similar age restrictions/limitations. Like juvenile humans, juvenile animals typically aren't mature enough physically or mentally for appropriate competition, so to require that they be entered and shown is unrealistic. Many breeds of dogs aren't physically and mentally mature until they're two or three years old.

What constitutes "verified proof of competition?"

Of what relevance are the "names of registered sire and dam, the name of the breeder and record keeping relating to breeding, transfer of ownership and death" to the City of Los Angeles?

RE: (2) Subsection (b)(2)8 of Section 53.15.2

In regard to agility training, herding or related designations for working dogs, presumably along with field and hunting activities, this proposed subsection claims that "there are no accepted professional standards or licensing procedures for such activities." That statement is simply incorrect. There are multiple agility competition venues each with their own registry and documentation, just as there are similar registries for herding, hunting, working, weight pulling, earth-dog, coursing, along with all of the performance activities. To disregard those registries and venues is a gross oversight by the Department, and needs to be further explored and investigated by your office.

RE: Subsection (b)(2)E of Section 53.15.2

The manner in which this proposed section is worded is intrusive into the world of veterinary knowledge. Just as in human medicine, there may not always be an appropriate diagnostic test or report for a particular condition or malady, but where veterinary knowledge and opinion may prevail and provide specific insights.

RE: New Subsections (b)(8), (9) and (10) of Section 53.15.2

Subsection (b)(8) is fraught with the presumption of guilt. Today, most dogs and cats have some form of permanent identification, whether microchip or tattoo, however, that likelihood seems not to have been considered in the proposal.

Subsection (b)(9), while probably well intended, may not provide sufficient time for an owner to organize and "collect" themselves within the stipulated timeline, and to further remove the right to appeal is beyond troublesome.

RE: Subsection (c)(3) of Section 53.15.2

"The draft ordinance would also prohibit the Department from issuing a breeding permit to a person who has been convicted of animal neglect, or who has failed to obtain appropriate licenses or permits for the animal for which the breeding permit is being sought." You're proposing to mix proverbial apples and oranges in that statement. A person convicted of animal cruelty, abuse or neglect is one thing, however, to include in the same breath, neglecting to obtain a license or permit, probably through sheer ignorance, is just over-reaching.

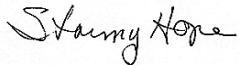
RE: New sub-Subsection I to Subsection (c)(4) of Section 53.15.2

Again, the proposed sub-Section is over-reaching. Are you talking Federal requirements, State requirements, County requirements, City requirements? To what are you referring? To require someone with one or two animals to comply with Federal requirements is completely inappropriate and uncalled for, and may often even be contradictory.

What you have proposed is poorly researched and poorly drafted. I'm sure that on further examination, your staff will agree.

Thank you for your time and consideration.

Sincerely,



Stormy Hope, CaRPOC VP

cc: Dov.Lesel, Assistant City Attorney
Paul Koretz, Personnel and Welfare Committee, Chair
Richard Alarcon, Personnel and Welfare Committee
Dennis P. Zine, Personnel and Welfare Committee
Adam Lid, Legislative Assistant. PAWs Committee
Sarah Sprouse, AKC Government Relations Department
Joan Miller, Legislative Coordinator, Cat Fanciers' Association
George Eigenhauser, Legislation Coordinator, Cat Fanciers' Association
Patti Strand, National Animal Interest Alliance
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