

Communication from Public

Name: kimberly wright

Date Submitted: 09/30/2019 06:51 PM

Council File No: 16-1357

Comments for Public Posting: Sept 30, 2019 Dear Council Members of the Personnel and Animal Welfare Committee: I would like my opposition to the LA exotic animal ordinance in its current language entered into the public record. The vagueness of the language is a very serious area of concern to myself as a stakeholder. Dangerous animal is not clearly defined. This is open to the interpretation of Animal Services, who should not be put in the position to discern that definition. Animal act or performance is also not clearly defined. My animal education and conservation organization participates in school fall festivals, community events, and science nights by presenting assemblies using live animals. These are conservation oriented educational presentations that could be deemed an animal performance with this current language. The understaffed, overburdened Animal Services should not be put in the position to make this definition. Insurance is not specific. Most animal educators carry \$1 million per occurrence, which is standard. The insurance required should be specific; otherwise this can hurt small wildlife educators. The ten day period for permits is too long. Many productions will not fall within this 10 day period and will have to go somewhere else. Five (5) days would be much more reasonable. There are many stakeholders that would be negatively affected by this vague ordinance. While the intention seems to be to protect the public safety, there are already a plethora of regulations & a strict permitting policies that have been effective in doing just that. The stakeholders deserve input into the language & discussion of this ordinance. A positive and thoughtful solution to creating effective language would be to form a working committee with at least one representative from each of the following categories: Animal Services Stakeholders (wildlife educators, production companies, film animal trainers) American Humane Association Association of Zoos and Aquariums (AZA) Zoological Association of America (ZAA) The purpose of this committee would be to assist Los Angeles Animal Services to determine the definitions proposed in this ordinance. As testament to the effectiveness of a Stakeholders Committee was the committee formed by California Department of Fish and Wildlife a few years ago to write Title 671.1 Permits for Restricted Species. The stakeholders were able to bring their varied experience together with DFW staff and proponents of new

regulations to write the permitting requirements for restricted species in the state of California. A positive solution involving all concerned stakeholders. Thank you for your consideration.
Sincerely, Kimberly Wright Co-director Wild Wonders cc
Councilmember John S. Lee Councilmember Curren D. Price, Jr.
Councilmember Paul Koretz

Sept 30, 2019

Dear Councilmember Koretz, chair, and Members of the Personnel and Animal Welfare Committee:

I would like my opposition to the LA exotic animal ordinance in its current language entered into the public record. The vagueness of the language is a very serious area of concern to myself as a stakeholder.

Dangerous animal is not clearly defined. This is open to the interpretation of Animal Services, who should not be put in the position to discern that definition.

Animal act or performance is also not clearly defined. My animal education and conservation organization participates in school fall festivals, community events, and science nights by presenting assemblies using live animals. These are conservation oriented educational presentations that could be deemed an animal performance with this current language. The understaffed, overburdened Animal Services should not be put in the position to make this definition.

Insurance is not specific. Most animal educators carry \$1 million per occurrence, which is standard. The insurance required should be specific; otherwise this can hurt small wildlife educators.

The ten day period for permits is too long. Many productions will not fall within this 10 day period and will have to go somewhere else. Five (5) days would be much more reasonable.

There are many stakeholders that would be negatively affected by this vague ordinance. While the intention seems to be to protect the public safety, there are already a plethora of regulations & a strict permitting policies that have been effective in doing just that. The stakeholders deserve input into the language & discussion of this ordinance. A positive and thoughtful solution to creating effective language would be to form a working committee with at least one representative from each of the following categories:

Animal Services

Stakeholders (wildlife educators, production companies, film animal trainers)

American Humane Association

Association of Zoos and Aquariums (AZA)

Zoological Association of America (ZAA)

The purpose of this committee would be to assist Los Angeles Animal Services to determine the definitions proposed in this ordinance.

As testament to the effectiveness of a Stakeholders Committee was the committee formed by California Department of Fish and Wildlife a few years ago to write Title 671.1 Permits for Restricted Species. The stakeholders were able to bring their varied experience together with DFW staff and proponents of new regulations to write the permitting requirements for

restricted species in the state of California. A positive solution involving all concerned stakeholders.

Thank you for your consideration.

Sincerely,

Kimberly Wright

Co-director

Wild Wonders

cc Councilmember John S. Lee

Councilmember Curren D. Price, Jr.

Communication from Public

Name: jackie navarro

Date Submitted: 09/30/2019 10:34 AM

Council File No: 16-1357

Comments for Public Posting: please enter the following as a matter of public record Sept 28, 2019 Dear Councilmember Koretz, chair, and Members of the Personnel and Animal Welfare Committee: I would like this entered into record. I am opposed to the exotic animal ordinance in its current language being considered. I see several areas of concern with the definitions. Dangerous animal is not clearly defined. Animal services should not be put in the position to discern that definition as their expertise does not encompass making this distinction. We present a reasonable alternative for your consideration below. Animal act or performance is not clearly defined. We participate in school fall festivals, community events, and science nights by presenting assemblies. These are conservation educational presentations that could be deemed an animal performance by someone who is not intimately familiar with the content and presentation. Animal Services should not be put in the position to make this definition as their expertise is not in making this distinction. Insurance is not specific. Most animal educators carry \$1 million per occurrence, which is accepted and robust industry standard. The insurance required should be specific; otherwise this can hurt small wildlife educators. Ten day period for permits is too long. Many productions will not fall within this 10 day period and will have to go somewhere else. Five (5) days would be much more reasonable. Stakeholders Committee. I propose forming a committee of at least one representative from each of the following categories: Animal Services Stakeholders (wildlife educators, production company, film animal trainers) American Humane Association Association of Zoos and Aquariums (AZA) Zoological Association of America (ZAA) The purpose of this committee would be to assist Los Angeles Animal Services to determine the definitions proposed in this ordinance. California Department of Fish and Wildlife formed a stakeholders committee a few years ago to write Title 671.1 Permits for Restricted Species. The stakeholders were able to bring their varied experience together with DFW staff and proponents of new regulations to write the permitting requirements for restricted species in the state of California. Thank you for your consideration. Sincerely, Jackie Navarro Executive director Wild Wonders cc Councilmember John S. Lee Councilmember Curren D. Price, Jr.

Communication from Public

Name: John Seyjagat

Date Submitted: 09/30/2019 03:07 PM

Council File No: 16-1357

Comments for Public Posting: September 29, 2019 Honorable Paul Koretz, Chair, Personnel and Animal Welfare Committee Honorable John S. Lee Honorable Curren D. Price, Jr. City Council of the City of Los Angeles Room 395, City Hall 200 North Spring Street Los Angeles, California 90012 RE: OPPOSITION to current form of Council file #16-1357. Please enter this letter into the public record to be included in any hearings, studies, and reports pertaining to this issue. Dear Chair Koretz and Councilmembers of the Personnel and Animal Welfare Committee: I am the Executive Director of the Zoological Association of America and writing to you to express serious concerns about possible unintended consequences if the current draft of the proposed Council file #16-1357 is not amended to provide some clarity and to recognize the realities of the marketplace affecting animal education businesses. With more than sixty accredited members, the Zoological Association of America (ZAA) is the second largest trade association in the zoological sector. We count among our members some of the finest facilities in the United States, including Fort Worth Zoo, Pittsburgh Zoo & PPG Aquarium, San Antonio Zoo, and Fossil Rim Wildlife Center. ZAA has accredited five professional zoological facilities in California, including at least one, Wild Wonders, which has performed thousands of uncontroversial educational programs featuring ambassador animals in the city and county of Los Angeles. ZAA does this as part of its core mission and holds them accountable to the highest standards of animal welfare, as well as public and animal safety. Our accreditation standards meet or exceed all accepted industry standards and federal requirements and we have the best record in the industry for public safety which is your primary concern. The ZAA has also been recognized by the U.S. Department of Agriculture for our efforts to improve and maintain animal welfare in collections throughout the country, and by the U.S. Fish & Wildlife Service for our conservation programs for species such as cheetahs and mandrills. ZAA has earned statutory recognition already in many states and local jurisdictions which have been updating their laws and ordinances. Exempting accredited zoological facilities' outreach programs is a common feature of the final product around the nation. There are significant deficiencies in the proposed draft that should be addressed by

experts. Several of the definitions in proposed Section 53.39.1 are problematical. The definition of “Dangerous Animal” is left completely to the discretion of the Department and could change as often as different people working there decide to regulate different species. One of the world’s largest and most important cities deciding to regulate something needs to make explicit what the subject matter of the regulation is. Further, the limitation of the length of regulated reptiles is nonsensical in the zoological world for either animal welfare or public safety. Section 53.39.1 (e), the actual prohibition in the ordinance, provides no definition of either “performing animal show” or, as mentioned, “Dangerous Animal.” If enacted as drafted, there will be countless people in a city the size of Los Angeles that will not know whether they are violating the law by educating schoolchildren at their science nights, approved events for elderly shut -ins or other educational programs about the natural world. This has to be unintended, because one of the purpose clauses of the proposed ordinance clearly acknowledges these to be permitted activities. As part of the permit process in 53.39.1 (c) proof of insurance is required, but only specified as “amount and form acceptable to the City’s risk manager.” It is difficult for animal program educators to know how to qualify for this. Lastly, many contracts to perform these educational shows are agreed to within the ten calendar days that would be required to file for and obtain a permit. It would be reasonable to statutorily allow a shorter period in which to apply. Please let me know what additional materials I need to provide to members and staff on Council or in your animal control function. Sincerely, John Seyjagat Executive Director Zoological Association of America (443) 392-5897 john@zaa.org



ZOOLOGICAL ASSOCIATION
OF AMERICA

September 29, 2019

Honorable Paul Koretz, Chair, Personnel and Animal Welfare Committee
Honorable John S. Lee
Honorable Curren D. Price, Jr.
City Council of the City of Los Angeles
Room 395, City Hall
200 North Spring Street
Los Angeles, California 90012

RE: OPPOSITION to current form of Council file #16-1357. Please enter this letter into the public record to be included in any hearings, studies, and reports pertaining to this issue.

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There are significant deficiencies in the proposed draft that should be addressed by experts. Several of the definitions in proposed Section 53.39.1 are problematical. The definition of "Dangerous Animal" is left completely to the discretion of the Department and could change as often as different people working there decide to regulate different species. One of the world's largest and most important cities deciding to regulate something needs to make explicit what the subject matter of the regulation is. Further, the limitation of the length of regulated reptiles is nonsensical in the zoological world for either animal welfare or public safety.

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Sincerely,



John Seyjagat
Executive Director
Zoological Association of America
(443) 392-5897
john@zaa.org

cc: Adam Lid