



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.

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,



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cc: Adam Lid