

BOARD OF COMMISSIONERS

SYLVIA PATSAOURAS
PRESIDENT

LYNN ALVAREZ
VICE PRESIDENT

TAFARAI BAYNE
NICOLE CHASE
JOSEPH HALPER

TAKISHA SARDIN
BOARD SECRETARY
(213) 202-2640



ERIC GARCETTI
MAYOR

MICHAEL A. SHULL
GENERAL MANAGER

ANTHONY-PAUL (AP) DIAZ, ESQ.
EXECUTIVE OFFICER &
CHIEF OF STAFF

CATHIE SANTO DOMINGO
ASSISTANT GENERAL MANAGER

MATTHEW RUDNICK
ASSISTANT GENERAL MANAGER

JIMMY KIM
ACTING ASSISTANT GENERAL MANAGER
(213) 202-2633 FAX (213) 202-2614

February 18, 2022

TO: HONORABLE MEMBERS OF THE ARTS, PARKS, HEALTH,
EDUCATION, AND NEIGHBORHOODS COMMITTEE

ATTN: ERIC VILLANUEVA, Legislative Assistant

FROM: MICHAEL A. SHULL, General Manager
Department of Recreation and Parks

SUBJECT: DEPARTMENT OF RECREATION AND PARKS INFORMATIONAL
REPORT BACK REGARDING GRIFFITH PARK PONY RIDE THIRD-
PARTY EQUINE EXPERT ASSESSMENT (C.F. 21-1457)

BACKGROUND

In late 2021, the Department of Recreation and Parks (“Department” or “RAP”) received public expressions of animal welfare concerns regarding the Department’s Griffith Park Pony Ride concession at Griffith Park (“Pony Rides”). The Pony Rides have been a recreational component in Griffith Park since the 1940s, operated under a concession agreement. As a result of these concerns, the Department retained a qualified equestrian veterinarian to perform an independent, third-party assessment of the operation. On December 8, 2021, a City Council motion instructed the Department to report back the findings of the veterinarian’s report. (C.F. 21-1457). This informational report back includes a summary of those findings, mandates imposed upon the operator, updates to the Department’s Pony Ride oversight, and a preliminary summation of comparable cities allowing pony rides, banning pony rides or imposing restrictions on pony rides.

SUMMARY OF THIRD-PARTY FINDINGS

On December 18, 2021 and January 3, 2022 Dr. Rachel Sachar, DVM, CVA, inspected the facility, observed the working conditions of the animals, and reviewed all veterinarian records and charts of operation.

Dr. Sachar’s assessment (Attachment A) rated the ponies’ working conditions as satisfactory. Additionally, no gross violations related to animal care and treatment were witnessed. However, Dr. Sachar’s report identified various issues requiring immediate attention as well as other areas for ongoing improvement. Most notably, some ponies



were in need of veterinary care for saddle sores, farrier care, or dental care. Additionally, violations of California Health and Safety Codes were found associated with animal identification protocols and record keeping, as well as fence enclosure disrepair.

OPERATIONAL CHANGES

To address the animal health and well-being findings, the Department notified the concessionaire, Los Angeles Pony Rides, Inc., on January 26, 2022, (Attachment B) with instructions to implement the following action items in alignment with the veterinarian's recommendations:

1. Maintain proper records for each animal
2. Update to the policies and practices for the care of the animals during times of extreme temperatures
3. Make facility improvements for better protection from environmental elements
4. Provide improved pony access to water; and
5. Implement greater public transparency for the pony care.

Based on the findings and recommendations of the third-party assessment report and California Health and Safety Code Section 25988(i), identification of each animal shall include name, breed, color, markings, size, age, sex, and photograph of each horse. In addition, annual veterinarian and dental examinations for each animal are required and records showing proof of good health including vaccinations, deworming, diet, workload restrictions and practices for each animal, as well as farrier and dental care, must be accurately recorded. All ponies must also be certified by an equine veterinarian to ensure they are fit for labor.

Dr. Sachar's investigation identified a need for facility improvement to provide the ponies with better protection from extreme winds and rain, standing water and excessive sun exposure. Recommendations were made for improvements that include the installation of wind breaks and improved shading around the premises. Coordination between RAP and the operator will be made to address the pooling of water after heavy rains caused by drainage issues on the premises.

To further address this goal and to respond to public concerns regarding proper care during times of extreme temperatures, recommendations were also made to update the Pony Rides current policies and its employee manual to include guidelines on acceptable working temperatures, methods for monitoring the animals when temperatures rise and fall, and instructions on how to care for the animals.

Finally, the report recommended increasing transparency and visibility of the care that is given to the ponies by making visible the times when the ponies are taking breaks

between providing rides to patrons. To further this goal, the Department will be working consistently with the operator and public.

Additional measures to increase the safety of the animals include the usage of safer breakaway harnesses to mitigate pony injuries should the halters become accidentally attached to the fence; the immediate repair of wiring fencing in some part of the pony enclosures, and the lowering of water troughs to improve access to water for the ponies.

PUBLIC INPUT TO DATE

The Board of Recreation and Parks Commissioners has received numerous emails and letters from animal rights advocates, community members, equestrians and other stakeholder groups regarding this topic. On February 3rd, 2022 the Commission's Task Force on Concessions held a special meeting to hear a presentation regarding the third-party assessment, including a verbal presentation from Dr. Sachar, and to hear public comment. A second special Task Force meeting occurred on February 17th, 2022, where the Department reported the findings and mandates reported here and to allow for approximately two hours of public comment.

CHANGES TO RAP INSPECTION PROCESS

To ensure all recommended actions and improvements identified by the third-party assessment are addressed, the Department will retain an equine veterinarian to conduct routine, unannounced inspections to independently verify implementation and adherence to these actions and protocol improvements. In addition to periodic inspections by various regulatory agencies, the Department will also be increasing the depth and frequency of its own Pony Ride inspections. Most notably, staff inspections will be updated to include a review of the on-site animal records to confirm the animals are receiving on-going veterinarian, dental, and farrier care.

CONCESSION AGREEMENT

It should be noted the initial five-year term of the concession agreement naturally expired on December 22, 2021. As previously approved by the City Council and the RAP Board, three one-year extension options are exercisable at the Department's discretion. These extensions have not yet been exercised. The operational changes and required actions described above can therefore be made a condition of an extension to the concession's agreement if an extension is offered.

PRELIMINARY BENCHMARKING RESEARCH – OTHER COMPARABLE CITIES

The Council motion also requested a report back with benchmarking research on how comparable cities deal with the use of horses for entertainment. Preliminarily, the Department has identified several comparable large U.S. cities offering commercial horse or pony riding experiences and some examples of cities that have discontinued or limited pony or horse experiences such as carriage rides. Locally in Southern California, the City of Montebello and the City of Irvine have pony ride attractions similar to the Griffith Park pony ride. The City of Santa Monica discontinued a pony ride sweep operation at a local farmers market. New York City (NYC) and San Francisco allow horses to be used for carriage rides and regulate the care and treatment of the animals, restricting operations in NYC when temperatures reach 90 degrees. However, the New York City Council and Mayor's Office is currently assessing a potential ban on carriage rides. Internationally, some large cities have discontinued pony rides. For example, it is now illegal to operate pony rides in Brussels. Other international cities allow the use of horses and ponies for entertainment with various regulatory requirements.

CONCLUSION

The Department is committed to ensuring public safety and the health and well-being of all of the animals at the Griffith Park Pony Ride. RAP plans to continue monitoring operations, conducting additional third-party inspections to ensure the mandated facility improvements occur.

FISCAL IMPACT STATEMENT

This informational report will have no impact on the City General Fund.

MS:MR:RR:lj

Attachments

- A) Griffith Park Pony Ride Third Party Assessment
- B) RAP Letter to Griffith Park Pony Ride Concessionaire – Required Actions

GRIFFITH PARK PONY RIDES POLICIES AND PRACTICES REPORT

**To the DEPARTMENT OF RECREATION AND PARKS FOR THE CITY OF LOS ANGELES
Regarding the third-party equine expert assessment requested on December 8, 2021**

By Rachael Sachar, DVM, CVA

CEO Twin Oaks Equine Veterinary Services

GRIFFITH PARK PONY RIDES POLICIES AND PRACTICES REPORT

INTRODUCTION

My name is Dr. Rachael Sachar. I have a Doctorate in Veterinary Medicine and a Bachelor of Science degree in animal science. I own and operate an ambulatory practice in Los Angeles County and focus primarily on equine, livestock, and exotic animals in all aspects of veterinary medicine and animal welfare. I frequently work with the LA Country Care and Control on large animal abuse cases, welfare evaluations, and rescues. My practice also services a large population of animals (including exotic animals) for hire involved in the movie and entertainment industry as well as those put-on display in animal sanctuaries.

I was hired by the City of Los Angeles Department of Recreation and Parks (RAP) as a third-party equestrian expert to assess the Griffith Park Pony Rides (GPPR) ponies and livestock, provide expertise on the welfare of the animals, review and report on the current policies and practices of the operation, and provide recommendations to any necessary changes to the operation of the pony rides to ensure the horses are being well cared for as per Exhibit #1.

ASSESSMENT

On Saturday, December 18th, 2021, I observed the pony ride exhibits during normal business operations to determine the normal working conditions for the animals.

On Monday, January 3rd, 2022, I visited the GPPR facility, met with owner/operator and his staff, examined each of the individual animals (38 ponies, 7 goats, 1 sheep, 2 rabbits) and inspected the facilities, veterinary expense records (2018-2022), and charts of operation.

I reviewed the GPPR employee handbook with current procedures and protocols for maintaining and caring for all animals, facilities, and running the pony rides, petting zoo, and pony party operations.

FINDINGS

During my assessment, I found the working conditions to be satisfactory and did not witness any gross violations related to the care or the treatment of the animals on exhibit.

Some of the concerns raised by the public are related to the ponies working when the ambient temperatures are more extreme. The current policies for acceptable working temperatures and methods for monitoring the animal's health and wellbeing when temperatures rise or fall, as listed in the Griffith Park Pony Rides manual, can be improved, and made more transparent to the public.

Management of the ponies' water and shade access may also be improved and expanded.

Most of the ponies and livestock examined were in reasonably good health and the facility was generally acceptable, but there were several legal violations that need to be rectified, medical issues that need to be addressed, and new policies and practices that need to be established for the safety and welfare of the animals involved and to provide a predictable transparent means by which the facility and its animals can be easily inspected and the health and wellbeing of the animals improved.

(See exhibit 2 "PONY EXAMINATIONS", and exhibit 3 "LIVESTOCK EXAMINATIONS").

At GPPR there are currently no identification methods utilized to identify each individual animal and there are no individual animal charts/ files/ or records. *In accordance with California Health and Safety Code 25998 (i) "each pony shall be individually identified, using humane methods such as a detailed description including but not limited to name, breed, color, markings, size, age, sex, and photograph"*

The charts of operation, schedule of working ponies, and feeding and medicating pony instructions were written on white boards on the tack room door. Copies of the veterinary expense records were provided to me but there is no current file/record for each animal kept at the facility to include its medical history, farrier care, or feeding and work schedule. The veterinary expense records indicate that all ponies were vaccinated May 2021 with vaccinations in accordance with guidelines set forth by the American Association of Equine Practitioners. These vet expense records demonstrate that annual physical and dental examinations and basic dentistry have not been part of the health care and management protocol of the ponies. Instead, the ponies have only been examined or treated when owner or staff considers it medically necessary. All but one of the ponies appeared to have adequate farrier care. Farrier and veterinary medical records of each animal were not located at the facility nor made available for my review. *In accordance with California Health and Safety Code 25998 (j) -Standards for horses for hire "farrier and veterinary receipts shall be kept and shall identify each equine treated"*

Dental examinations of the ponies revealed that most of the ponies were geriatric (20 to 30 years old). One pony was in its late 30s. Almost all the ponies had sharp enamel points or moderate to severe occlusal problems and needed dental care. In reviewing the veterinary expense records, it was evident that very few of the ponies had received any dental care between 2018 and 2021.

Several of the ponies had saddle sores and/or callouses over their withers. Charts of operation indicated that these ponies were still in full work and veterinary expense records indicated that they were not currently under any veterinary treatment for these lesions. *In accordance with California Health and Safety Code 25998 (h1) -Standards for horses for hire "an equine shall not be available for hire or use if the equine has sores or abrasions caused or likely to be irritated by the surfaces of saddles, girths, harnesses, or bridles"*

GPPR houses multiple ponies together in moderate sized outdoor enclosures made of chain link, grouping them together based on nutrient needs and social structures. When the ponies are turned out in their enclosures, GPPR keeps halters on many of the ponies that are challenging to catch. This poses a potential hazard to the pony if the halter gets caught on a fence or a foot, however, it is not in violation of any laws.

The outdoor pony enclosures and shelters meet most of the requirements of state and federal laws but are not optimal for protecting the ponies in extreme wind or rain. They have no wind breaks, have poor drainage, and were still muddy from recent rains. The enclosures were otherwise clean and had very little manure or urine. Several of the chain-link fences were in disrepair causing a hazard (wire was bent out of shape and protruding into the pony enclosures). *In accordance with California Health and Safety Code 25998 (c)-Standards for Horses for Hire "buildings, premises, and conveyances used in conjunction with equines shall be kept free of sharp objects, protrusions, or other materials that are likely to cause injury"*.

The GPPR barn is a very nice structure. One of the outdoor enclosures opened into a section of the barn and provided very nice protection from weather conditions. I was told that during the heavy rain, more of the ponies were brought into this section of the barn for shelter, but some of them were left outside. The barn had multiple individual stalls but only 3 ponies and the livestock were housed in the stalls. All the stalls had bedding. The rabbits were in adequately sized hutches. All ponies and livestock were

supplied with nutritionally adequate feed and clean water. All feed was appropriately stored and protected from weather and rodents. The pony ride tack and grooming supplies were located inside the barn in a small room.

SUMMARY OF RCOMMENDED CHANGES TO THE OPERATION OF THE PONY RIDES

The following is a list of recommended changes to the operations of the pony rides that includes new policies and practices that need to be established 1.) to meet current legal standards set forth by California Health and Safety Code 25998-Standards for Horses for Hire 2.) for the safety and welfare of the animals involved 3.) for a predictable transparent means by which the facility and its animals can be easily inspected.

- Each animal needs to be properly identified
(Name, age, breed, sex, picture, identifiable markings, microchip)
- Each animal needs to have an ongoing record at the facility available for review
(vaccine, deworming, and farrier schedule, medical and dental history, diet and workload restrictions and practices)
- Each animal should have an annual examination by a licensed veterinarian to check their overall wellness as part of a comprehensive preventative health care plan.
- Each ponies' annual exam should include a dental examination
- Each pony should receive annual dental care (occlusal adjustments /dental floats) unless the regular veterinarian deems the treatment unnecessary that particular year.
- I strongly recommend that the ponies of concern (highlighted in my examinations) receive dental care by their veterinarian immediately and that all ponies that have not received any dental care within the past year receive it within a reasonable time (within 6 months)
- Any ponies with saddle sores should be immediately examined/ treated by a veterinarian and removed from any work until completely cleared by veterinarian. All the pony's tack should be examined and modified, if necessary, before returning to work.
- Any pony requiring a halter to be left on it should be supplied with a safer breakaway halter
- The outdoor chain link fence enclosures need to be fixed to prevent potential hazards
- The outdoor enclosures need to be graded to allow for better drainage
- Current Griffith Park Pony Rides Employee Manual should be thoroughly reviewed, updated, and made more transparent to improve current policies and standards of operation including policies for acceptable working temperatures and methods for monitoring the animal's health and wellbeing when temperatures rise or fall
- Management of the ponies' water and shade access may also be improved and expanded upon at the pony ride exhibits

EXHIBIT 1

NEED AND BASIS FOR RECOMMENDATIONS

A recent motion by the LA City Council has asked that the Department of Recreation and Parks (RAP) to provide recommendations on 1.) any necessary changes to the operation of the pony rides to ensure the health and well-being of the horses and 2.) any potential changes to the current concession agreement of consideration of a new concession agreement, if necessary, that will enable a more transparent and humanitarian approach for the operation of the rides. Please see the above Summary of Necessary Changes to the Operation of Pony Rides for my initial recommendations to the RAP and Council.

The Council has asked RAP to provide recommendations on benchmarking research on how comparable cities deal with the use of horses for entertainment. This request is beyond the scope of my initial contract with RAP. However, I have done a preliminary, cursory review of a few other cities around the United States and their current standards and policies on horses for hire. Many are more extensive and well defined including those provided by New York City (Horses working in NYC) <https://www.1.nyc.gov/site/doh/health/health-topics/horses.page> or those provided by Massachusetts in 330 Code of Massachusetts Regulations Title 330 CMR 16.00 – Horses. I recommend a more complete review be pursued. I believe the current concession should have a conditional use permit that has more robust requirements including, but not limited to, those listed in my summary combined with additional requirements such as the laws currently in use in NYC and Massachusetts regulating horses for hire.

The Council has asked RAP to also report on changes and improvements to the inspection process as administered by RAP including the potential use of a third-party equine expert to be responsible for inspections of the horses' health and that the Department of Animal Services provide a detailed description of the process of annual inspections for the concessionaire's annual permit, the protocols and procedures for animal control inspections that arise when a complaint is filed, and any recommendations to ensure the health and well-being of the horses at Griffith Park. At this time, I have not received or reviewed the current description of the process of annual inspections or the protocols and procedures for animal control inspections of the GPPR concession. Therefore, I cannot provide any recommendations for improvements to these inspections.

As previously stated, I frequently work with the LA Country Care and Control on large animal abuse cases, welfare evaluations, and rescues. The requirements at residential and other facilities must only meet current federal and state animal welfare laws which provide for the minimum standards of horse care as are described extensively in "A Guide: Minimum Standards of Horse Care in California" produced in 2019 by UC Davis Veterinary Medicine, Center for Equine Health. My practice also services a number of clients with animals for hire involved in the movie and entertainment industry as well as those on display in animal sanctuaries. As such, I am accustomed to working with collections of animals that are under intense scrutiny by the public and animal rights activists, leading them to generally provide additional exceptional standards of care and management beyond the basic legal obligations set forth by current laws to protect the welfare and well-being of these animals. I advise that the GPPR concession adopt similar policies that surpass current legal requirements in a transparent and continually reviewed manner to quell concerned members of the public who are not happy or satisfied with current laws and regulations dictating the care and welfare of animals for hire or on display. Such individuals will continue to object to current living conditions, health management practices, and display exhibits for these animals unless current standards are improved. This poses a disconnect when animal

control officers or other entities are tasked with inspecting such facilities and use the current laws and guidelines that are in place. This is likely a contributing factor as to why the city continues to receive numerous concerns regarding the health and well-being of the animals at this concession, yet the RAP and Department of Animal Services has found no legal violations. It must be noted, that to some degree, extreme activists will never agree with any animals working for hire in an entertainment capacity due to their underlying beliefs against any animals used for work, entertainment, performance, or on display as they believe any and all of these practices are abusive.

Moving forward, if LA City Council and the Department of Recreation and Parks believes that the Griffith Park Pony Rides is an important attraction and recreational activity for its residents, then there needs to be a few modifications and updates to the current protocols and policies of the concession. These changes will include improvements to animal care practices, better documentation of the management and care of each animal, and improved facility design. With such updated protocols and improved care, Griffith Park Pony Rides can be a viable and sustainable concession and feature for Los Angeles and surrounding communities.

EXHIBIT 2

PONY EXAMINATION FINDINGS

1) Name: Turbo

Medium pony gelding

Age: ~25yrs BCS:4.5/9

HR:44 RR:20 T:100.7 mm: p/m GI: WNL

Teeth: some missing dentition, moderate sharp enamel points, geriatric mouth

Coat/skin: long winter coat, no current skin issues

Feet/hooves: adequate trim/balance, palpable heat, increased pulses, difficulty walking, painful

Other: Active laminitis, just seen and under treatment by regular vet on 1/2/22

2) Name: Willow

Pony-go-round pony mare

Age: ~20yrs BCS:5/9

HR:32 RR:12 T:99.6 mm: p/m GI: WNL

Teeth: small sharp enamel points

Coat/skin: long winter coat; no current skin issues

Feet/hooves: adequate trim/balance; no lameness

3) Name: Trixie

Pony-go-round and party pony mare

Age: ~20yrs BCS: 6/9

HR: 40 RR: 24 T: 100.1 mm: p/m GI: WNL

Teeth: small sharp enamel points

Coat/skin: long winter coat; no current skin issues

Feet/hooves: adequate trim/balance; no lameness

4) Name: Dino

Medium pony gelding

Age: ~20yrs BCS: 5/9

HR: 40 RR:20 T: 99.6 mm: p/m GI: WNL

Teeth: some missing dentition, extreme wear, geriatric mouth

Coat/skin: long winter coat, acquired markings from saddle on withers but no lesions

Feet/hooves: adequate trim/balance/ no lameness

5) Name: Pepsi

Slow pony gelding

Age: ~25yrs BCS: 5/9

HR: 40 RR: 12 T: 99 mm: p/m GI: WNL

Teeth: sharp enamel points, extreme wear, geriatric mouth

Coat/skin: long winter coat; no current skin issues

Feet/hooves: adequate trim/balance/ no lameness

6) Name: Ruby

Slow pony mare

Age: ~25yrs BCS: 5/9

HR: 32 RR: 12 T: 98.9 mm: p/m GI: WNL

Teeth: moderate wear and sharp enamel points, geriatric mouth

Coat/skin: long winter coat, acquired from saddle markings on withers but no lesions

Feet/hooves: adequate trim/balance/ no lameness

7) Name: Shaggy
Medium pony mare
Age: ~15-20yrs BCS:5/9
HR:40 RR:12 T:99.2 mm: p/m GI: WNL
Teeth: small sharp enamel points
Coat/skin: long winter coat, no current skin issues
Feet/hooves: adequate trim/balance/ no lameness

8) Name: Prince
Medium pony gelding
Age: ~20yrs BCS:5/9
HR:40 RR:16 T:98.9 mm: p/m GI: WNL
Teeth: small sharp enamel points
Coat/skin: long winter coat; no current skin issues, acquired markings on withers
Feet/hooves: adequate trim/balance; no lameness

9) Name: Freckles
Medium pony gelding
Age: ~20yrs BCS: 5/9
HR: 40 RR: 12 T: 99.5 mm: p/m GI: WNL
Teeth: small sharp enamel points, overbite
Coat/skin: long winter coat; scarring and callous formation on withers; extreme sensitivity over withers
Feet/hooves: adequate trim/balance; no lameness

10) Name: Pepper
Medium pony gelding
Age: ~20yrs BCS: 5/9
HR: 44 RR:20 T: 99.6 mm: p/m GI: WNL
Teeth: small sharp enamel points
Coat/skin: long winter coat, acquired markings from saddle on withers but no lesions
Feet/hooves: adequate trim/balance/ no lameness

11) Name: Nikki
Slow pony gelding
Age: ~25-30yrs BCS: 5/9
HR: 40 RR: 12 T: 98.9 mm: p/m GI: WNL
Teeth: moderate wear, moderate enamel points, geriatric mouth
Coat/skin: long winter coat, acquired markings from saddle on withers but no lesions
Feet/hooves: adequate trim/balance/ no lameness

12) Name: Chuckie
Medium pony gelding
Age: ~15-18 BCS: 5/9
HR: 44 RR: 12 T: 99.6 mm: p/m GI: WNL
Teeth: small sharp enamel points
Coat/skin: long winter coat, acquired markings from saddle with saddle sore lesion and dermatological condition
Feet/hooves: adequate trim/balance/ no lameness

13) Name: Flash

Medium pony gelding

Age: ~20yrs BCS:5/9

HR:40 RR:20 T:100 mm: p/m GI: WNL

Teeth: small sharp enamel points

Coat/skin: long winter coat, acquired markings on withers but no lesions

Feet/hooves: Feet/hooves: adequate trim/balance/ no lameness

14) Name: Snickers

Medium pony gelding

Age: ~20yrs BCS:5/9

HR:44 RR:20 T:100.1 mm: p/m GI: WNL

Teeth: small sharp enamel points

Coat/skin: long winter coat; no current skin issues, acquired markings on withers but no lesions

Feet/hooves: adequate trim/balance; no lameness

15)Name: Money

Medium pony gelding

Age: ~15yrs BCS: 6/9

HR: 44 RR: 20 T: 99.8 mm: p/m GI: WNL

Teeth: nice mouth, recently floated

Coat/skin: long winter coat; no current skin issues, acquired markings on withers but no lesions

Feet/hooves: adequate trim/balance; no lameness

16) Name: Gypsy

Pony-go-round pony mare--NOT currently using /difficult

Age: ~15-20yrs BCS: 5/9

HR: 44 RR:20 T: 99.1 mm: p/m GI: WNL

Teeth: small sharp enamel points

Coat/skin: long winter coat, acquired markings from saddle on withers but no lesions

Feet/hooves: long toes, needs trim and balance/ no lameness

Other: Very difficult to catch and handle

17) Name: Matilda

Slow pony mare

Age: ~12-15rs BCS: 6/9

HR: 44 RR: 12 T: 99.2 mm: p/m GI: WNL

Teeth: small sharp enamel points

Coat/skin: long winter coat, no lesions

Feet/hooves: adequate trim/balance/ no lameness

Other: abnormal vulvar conformation

18) Name: Butters

Pony-go-round pony parties gelding

Age: ~20yrs BCS: 5/9

HR: 40 RR: 20 T: 98.9 mm: p/m GI: WNL

Teeth: recently floated, nice balance

Coat/skin: long winter coat

Feet/hooves: adequate trim/balance/ no lameness

19) Name: Peanut
Slow pony gelding—not currently in use
Age: ~20yrs BCS:6/9
HR:44 RR:20 T:99.2 mm: p/m GI: WNL
Teeth: small sharp enamel points
Coat/skin: long winter coat
Feet/hooves: Feet/hooves: adequate trim/balance/ no lameness

20) Name: Griff
Dwarf mascot pony gelding
Age: ~20yrs BCS:5.5/9
HR:44 RR:20 T:100.3 mm: p/m GI: WNL
Teeth: small sharp enamel points
Coat/skin: long winter coat; no current skin issues
Feet/hooves: adequate trim/balance; no lameness; angular limb deformity

21) Name: Nala
Slow pony mare
Age: ~late 20syrs BCS: 5/9
HR: 40 RR: 16 T: 100.1 mm: p/m GI: WNL
Teeth: small sharp enamel points
Coat/skin: long winter coat; large thick callouses on withers
Feet/hooves: adequate trim/balance; no lameness

22) Name: Snowball
Slow pony gelding
Age: ~20yrs BCS: 5/9
HR: 44 RR:20 T: 100.1 mm: p/m GI: WNL
Teeth: small sharp enamel points
Coat/skin: long winter coat, bilateral areas of blunted hair along dorsolateral lumbosacral region
Feet/hooves: adequate trim/balance; no lameness

23) Name: Waffles
Pony gelding
Age: ~20rs BCS: 5/9
HR: 44 RR: 12 T: 99.2 mm: p/m GI: WNL
Teeth: small sharp mild points
Coat/skin: long winter coat, no lesions
Feet/hooves: adequate trim/balance/ no lameness

24) Name: Chewy
Slow pony and parties gelding
Age: ~25yrs BCS: 5/9
HR: 40 RR: 20 T: 99.5 mm: p/m GI: WNL
Teeth: mandibular ramps and sharp enamel points
Coat/skin: long winter coat, mild dermatological condition on withers; mild scabbing and erythema ventral to anus
Feet/hooves: adequate trim/balance/ no lameness

25) Name: Tony
Big pony gelding—in training
Age: ~12-15yrs BCS:5/9
HR:36 RR:16 T:100.3 mm: p/m GI: WNL
Teeth: small sharp enamel points
Coat/skin: long winter coat
Feet/hooves: Feet/hooves: adequate trim/balance/ no lameness

26) Name: Red
Big pony gelding—in training
Age: ~15-20yrs BCS:5.5/9
HR:40 RR:20 T:100.8 mm: p/m GI: WNL
Teeth: small sharp enamel points
Coat/skin: long winter coat; no current skin issues
Feet/hooves: adequate trim/balance; no lameness

27) Name: Spots
Big pony mare
Age: ~20yrs BCS: 4.5/9
HR: 40 RR: 16 T: 98.1 mm: p/m GI: WNL
Teeth: small sharp enamel points
Coat/skin: long winter coat
Feet/hooves: adequate trim/balance; mechanical lameness: Fibrotic myopathy

28) Name: Phillip
Big pony gelding
Age: ~20yrs BCS: 5/9
HR: 40 RR:20 T: 100.4 mm: p/m GI: WNL
Teeth: missing mandibular premolar + over elongated maxillary premolar /uneven wear
Coat/skin: long winter coat
Feet/hooves: adequate trim/balance; no lameness

29) Name: Lucky
Big pony gelding
Age: ~20rs BCS: 5/9
HR: 40 RR: 20 T: 100.3 mm: p/m GI: WNL
Teeth: large hooks, sharp enamel points
Coat/skin: long winter coat, no lesions
Feet/hooves: adequate trim/balance/ no lameness

30) Name: Benny
Big Pony gelding
Age: ~20yrs BCS: 5/9
HR: 40 RR: 20 T: 101.4 mm: p/m GI: WNL
Teeth: small sharp enamel points
Coat/skin: long winter coat, acquired marks on withers
Feet/hooves: adequate trim/balance/ no lameness
Other: mild bilateral ocular discharge/ epiphora

31) Name: Whisky
Big pony gelding
Age: ~20yrs BCS:4-4.5/9 thin
HR:40 RR:16 T:99.5 mm: p/m GI: WNL
Teeth: small sharp enamel points
Coat/skin: long winter coat
Feet/hooves: Feet/hooves: adequate trim/balance/ no lameness

32) Name: Topaz
Big pony gelding—in training
Age: ~12-15yrs BCS:5/9
HR:40 RR:20 T:101.3 mm: p/m GI: WNL
Teeth: small sharp enamel points
Coat/skin: long winter coat; no current skin issues
Feet/hooves: adequate trim/balance; no lameness

33) Name: Fireball
Big pony mare—in training
Age: ~15yrs BCS: 5/9
HR: 40 RR: 16 T: 99.0 mm: p/m GI: WNL
Teeth: small sharp enamel points
Coat/skin: long winter coat
Feet/hooves: adequate trim/balance

34) Name: Mystery
Big pony mare
Age: ~15yrs BCS: 5/9
HR: 40 RR:20 T: 99.7 mm: p/m GI: WNL
Teeth: small sharp enamel points
Coat/skin: long winter coat
Feet/hooves: adequate trim/balance; no lameness

35) Name: Sparkles
Pony-go-round gelding pony
Age: ~20rs BCS: 6/9
HR: 40 RR: 20 T: 98.9 mm: p/m GI: WNL
Teeth: small sharp enamel points
Coat/skin: long winter coat, no lesions
Feet/hooves: adequate trim/balance/ no lameness

36) Name: Buck
Pony-go-round gelding pony
Age: ~18yrs BCS: 5/9
HR: 40 RR: 20 T: 98.9 mm: p/m GI: WNL
Teeth: small sharp enamel points
Coat/skin: long winter coat
Feet/hooves: adequate trim/balance/ no lameness

37) Name: Champ
Slow pony gelding
Age: ~20yrs BCS:5/9
HR:40 RR: 20 T:102.6 FEVER mm: p/m GI: WNL
Teeth: small sharp enamel points
Coat/skin: long winter coat
Feet/hooves: Feet/hooves: adequate trim/balance/ no lameness
Other: has Cushing's/ on prascend

38) Name: Dutchess
Party pony mare—only occasionally works
Age: ~36-38yrs BCS:4/9 thin
HR:36 RR:16 T:99.1 mm: p/m GI: WNL
Teeth: missing some dentition; geriatric mouth
Coat/skin: long winter coat; acquired marks on withers; flaky skin on withers
Feet/hooves: adequate trim/balance; no lameness
Other: has Cushing's/ on prascend

***PONIES NEEDING DENTAL CARE ASAP:** 1) Turbo, 4) Dino, 5) Pepsi 6) Ruby, 11) Nikki, 24) Chewy, 28) Phillipe, 29) Lucky, 38) Dutchess

***PONIES NEEDING EVALUATION OF SADDLE-SORE LESIONS ASAP:** 9) Freckles, 12) Chuckie, 21) Nala

***PONY NEEDING FARRIER CARE ASAP:** 16) Gypsy

***PONIES NEEDING FOLLOWUP /CONTINUED VETERINARY CARE:** 1) Turbo (laminitis), 37) Champ (fever)

***PONIES NEEDING ANNUAL DENTAL CARE WITHIN A TIMELY MANNER:** 2) Willow, 3) Trixie, 7) Shaggy, 8) Prince, 9) Freckles, 10) Pepper, 12) Chuckie, 13) Flash, 14) Snickers, 16) Gypsy, 17) Matilda, 19) Peanut, 20) Griff, 21) Nala, 22) Snowball, 23) Waffles, 25) Tony, 26) Red, 27) Spots, 30) Benny, 32) Topaz, 33) Fireball, 34) Mystery, 35) Sparkles, 36) Buck, 37) Champ

EXHIBIT 3

LIVESTOCK EXAMINATION FINDINGS

Name: Jerry
Caprine: Nigerian dwarf wether goat
Age: Adult BCS:5/9
HR:60 RR:32 T:102.7 mm: p/m GI: WNL
Teeth: normal
Coat/skin: normal
Feet/hooves: adequate trim

Name: Bitsy
Caprine: Nigerian dwarf wether goat
Age: Adult BCS:5/9
HR:48 RR:24 T:101.1 mm: p/m GI: WNL
Teeth: normal
Coat/skin: normal
Feet/hooves: adequate trim

Name: Gus
Caprine: Nigerian dwarf wether goat
Age: Adult BCS:5/9
HR:66 RR:32 T:101.5 mm: p/m GI: WNL
Teeth: normal
Coat/skin: normal
Feet/hooves: adequate trim

Name: Ben
Caprine: Nigerian dwarf wether goat
Age: Adult BCS:5.5/9
HR:60 RR:30 T:99.7 mm: p/m GI: WNL
Teeth: normal
Coat/skin: normal
Feet/hooves: adequate trim

Name: Larry
Caprine: Ovine/sheep neutered male
Age: Adult BCS:7/9 obese
HR:56 RR:36 T:101.0 mm: p/m GI: WNL
Teeth: normal
Coat/skin: normal
Feet/hooves: adequate trim

Name: Andy
Caprine: Nigerian dwarf wether goat
Age: <1yr BCS:5/9
HR:60 RR:30 T:100.6 mm: p/m GI: WNL
Teeth: normal
Coat/skin: normal
Feet/hooves: adequate trim

Name: Jenny
Caprine: Nigerian dwarf wether goat
Age: <1yr BCS:5/9
HR:60 RR:30 T:101.3 mm: p/m GI: WNL
Teeth: normal
Coat/skin: normal
Feet/hooves: adequate trim

Name: Beans
Caprine: Nigerian dwarf wether goat
Age: Adult BCS:5/9
HR:60 RR:28 T:101.9 mm: p/m GI: WNL
Teeth: normal
Coat/skin: normal
Feet/hooves: adequate trim

Name: Spice
Adult male rabbit
BCS: 5/9
HR: 130 RR: 32 T: 101.2 mm: p/m GI: WNL
Teeth: normal
Coat/skin: normal
Feet/hooves: adequate trim

Name: Spice
Adult male rabbit
BCS: 5/9
HR: 160 RR: 44 T: 101.4 mm: p/m GI: WNL
Teeth: normal
Coat/skin: normal
Feet/hooves: adequate trim

**DEPARTMENT OF RECREATION
AND PARKS**

BOARD OF COMMISSIONERS

SYLVIA PATSAOURAS
PRESIDENT

LYNN ALVAREZ
VICE PRESIDENT

TAFARAI BAYNE
NICOLE CHASE
JOSEPH HALPER

TAKISHA SARDIN
BOARD SECRETARY
(213) 202-2640

CITY OF LOS ANGELES
CALIFORNIA



ERIC GARCETTI
MAYOR

MICHAEL A. SHULL
GENERAL MANAGER

ANTHONY-PAUL (AP) DIAZ, ESQ.
EXECUTIVE OFFICER &
CHIEF OF STAFF

CATHIE SANTO DOMINGO
ASSISTANT GENERAL MANAGER

MATTHEW RUDNICK
ASSISTANT GENERAL MANAGER

JIMMY KIM
ACTING ASSISTANT GENERAL MANAGER
(213) 202-2633 FAX (213) 202-2614

January 26, 2022

Mr. Stephen A. Weeks
Los Angeles Pony Rides, Inc.
11095 Wrightwood Lane
Studio City, CA 91604

**GRIFFITH PARK PONY RIDE CONCESSION – REQUIRED ACTIONS BASED ON
FINDINGS FROM THIRD PARTY GRIFFITH PARK PONY RIDES POLICIES AND
PRACTICES ASSESSMENT REPORT**

Dear Mr. Weeks,

As you know, the Department of Recreation and Parks (RAP) has received complaints regarding the health and welfare of the ponies at the Griffith Park Pony Ride concession. Due to these concerns, RAP retained a third-party equine expert, Dr. Rachel Sachar, DVM, CVA, to assess the conditions at the facility and conduct a thorough examination of the animals to evaluate their health and welfare. Visits to the concession were made on December 18, 2021 and January 3, 2022. In addition to inspecting the facility, Dr. Sachar observed the working conditions of the animals; and reviewed veterinary records and charts of operation. Attached to this letter is a copy of the report which details the findings of the assessment.

While Dr. Sacher found the working conditions to be satisfactory and did not witness any gross violations related to the care or the treatment of the animals, based upon the report, RAP has determined that immediate action is required for the following listed items to improve the health and welfare of the animals and to ensure compliance with legal standards set forth by California Health and Safety Codes:

VETERINARY CARE

- 1) **Immediately remove from service ponies needing treatment or currently being treated for saddle sores, farrier care, or additional veterinarian follow-up care.** As discussed during a telephone conversation on January 18, 2022 with LaTricia Jones of my staff, a recommendation that needed immediate attention was the removal from service of three ponies that were identified as having saddle



sore lesions. Two additional ponies were identified as needing follow-up and continuing veterinarian care and one additional pony was identified as needing immediate farrier care. During a follow-up conversation, you mentioned that three of the ponies were not in service and are currently being medically treated or evaluated; the others would be examined and cleared by a veterinarian before returning to service. **Prior to returning the identified ponies back to service, please provide records to our office from a licensed veterinarian showing that their treatment has been completed and that they are certified as being fit for rides.**

- 2) For the animals listed in the report as needing immediate dental care, please schedule appointments for care within **two weeks** from the date of this letter. For the other ponies that have been identified as needing dental care within a timely manner, please provide proof of care **within six (6) months** from the date of this letter.

RECORDS

- 1) **Individualized identification of each animal on the premises.** California Health and Safety Code Section 25988 (i) states "Each [pony] shall be individually identified, using humane methods such as a detailed description including but not limited to name, breed, color, markings, size, age, sex, and photograph". Please submit identification documentation for each animal within **two weeks** from the date of this letter along with confirmation that such individualized identification will be maintained going forward.
- 2) **Records of veterinarian and farrier care for each animal on the premises. Records should also include information pertaining to vaccinations, deworming, diet, and workload restrictions and practices for each animal.** California Health and Safety Code Section 25988(j), states that all farrier and veterinary receipts shall be retained and all such receipts shall identify each equine treated. In addition, California Health and Safety Code Section 25988(k) requires you to produce all farrier, veterinary, and feed records upon request. Given the deficiencies noted in Dr. Sacher's report, please submit receipts for all veterinarian and farrier care for each animal within **two weeks** of the date of this letter. If records for any individual ponies are unavailable or do not exist, please provide proof to our office of scheduled upcoming appointments for equine veterinary examinations. For those ponies without corresponding records, please be advised that, effective the date of this letter, an equine veterinarian will need to certify that the pony is fit for labor prior to that pony being used for rides.
- 3) **Update Griffith Park Pony Ride Employee Manual.** A thorough review and update to the employee manual should be made to improve current policies and practices, specifically as it applies to acceptable working temperatures for the

ponies and the care that must be provided during times when the temperatures rise and fall. This should include the establishment of a new protocol to modify and/or shut-down operations during times of inclement weather such periods of extreme heat. Please provide a copy of your employee manual with updated information within **60 days** from the date of this letter.

FACILITY AND EQUIPMENT IMPROVEMENTS

- 1) **Repair of fencing in pony enclosures.** During the inspection of the pony enclosures, parts of the chain-link fence surrounding the area were found in disrepair where wires were bent out of shape and protruding into the pony enclosure causing a hazard to the ponies inside. Per California Health and Safety Code Section 25988(c), "Buildings, premises, and conveyances used in conjunction with equines shall be kept free of sharp objects, protrusions, or other materials that are likely to cause injury". Additionally, in accordance with Section 10A.1 of your Concession Agreement, you are required to maintain all improvements, which includes fences, on the premises. Please attend to the areas of the chain-link fence that need repair within **two weeks** of the date of this letter
- 2) **Safer breakaway halters.** For ponies that require a halter to be left on, a safer breakaway halter is needed to mitigate injuries to the ponies should the halter become accidentally attached to the fence. Please provide our office with the name and model of a safer halter that will replace the existing halters, within **30 days** from the date of this letter.
- 3) **Improved wind and rain protection for the ponies.** The current outdoor pony enclosures were found provide insufficient protection from extreme winds or rain. Please discuss options with RAP for the installation of wind breaks or some type of barrier to block or reduce the amount of wind the ponies are exposed to during times of extreme winds within **30 days** from the date of this letter. RAP will also coordinate with you on drainage issues to help mitigate pooling of excess water after heavy rains.
- 4) **Improved water access and shading for the ponies.** Please submit plans for improved access to water, such as lowering water troughs, and improved shading for the ponies to include areas behind the barn. These plans should be forwarded to our office within **30 days** from the date of this letter.
- 5) **Increase transparency to the public regarding care of the ponies during inclement weather and working pony breaks.** To raise the public's awareness of the care that is provided to the animals, increased transparency is required. Some suggestions for greater transparency include installing a temperature gauge in the pony ring area for customer and employee visibility, displaying information to the public on how the ponies are cared for during times of extreme heat or cold,

Los Angeles Pony Rides, Inc.

January 26, 2022

Page 4 of 4

and creating a designated area for pony breaks with “break signage” visible to the public. Please plan to discuss these options and other ideas for increased public transparency with RAP within **30 days** of the date of this letter.

Thank you for your immediate attention to the aforementioned actions. Please forward all requested information to LaTricia.Jones@lacity.org. While some of the action items listed above extend six-months from the date of this letter, it should be noted that the initial 5-year term of the concession agreement between RAP and Los Angeles Pony Rides, Inc. naturally expired on December 22, 2021 and, therefore, the two parties are operating on a month-to-month status under the same terms and conditions..

If you have any questions or would like to speak further on any of the items listed above, please feel free to contact LaTricia Jones, at the above email address or contact me at Rachel.Ramos@lacity.org.

Sincerely,



RACHEL RAMOS
Concessions Manager

RR:lj

CC: Michael Shull, General Manager
Matthew Rudnick, Assistant General Manager
Stefanie Smith, Superintendent, Griffith Park
LaTricia Jones, Management Analyst, Concessions