

THE URBAN WILDLANDS GROUP, INC.

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June 27, 2016

Personnel and Animal Welfare Committee
Councilmember Paul Koretz, Chair
Los Angeles City Council
200 North Spring Street
Los Angeles, CA 90012

**Re: Council File 16-0600-S8 – Budget Recommendations / Department of Animal Services
/ Exception to the Number of Dogs and Cats Allowed for Residents**

Dear Chair Koretz and Committee Members:

The Urban Wildlands Group is a Los Angeles-based nonprofit organization dedicated to the protection of species, habitats, and ecological processes in urban and urbanizing areas.

The “instruction” from the City Council found in Council File 16-0600-S8 requests that the Department of Animal Services investigate the possibility of providing an “exception” to the limit on the number of cats and dogs allowed per premises for residential lots over 10,000 square feet or having more than one legal dwelling. This recommendation raises a number of issues that deserve comment.

We concentrate on the implications of allowing more cats per premises because of our longstanding interest in the environmental impacts of outdoor cats in the City of Los Angeles. An increase in the number of dogs allowed per premises could also create problems but it is not something that we will address.

I watched the budget hearings where this issue was raised by a councilmember, and I recall that the inquiry was made relative to single-family residential neighborhoods. But that is not clear in the request, nor is the language of the request clear enough for the public to understand its intent. What is meant by “exception”? Does the Council envision an “exemption” to the limits on the number of dogs and cats allowed per premises? What is the nature of the “exception” that is being requested? To what types of properties does this refer?

This “instruction” is the latest in a series of motions from members of the Council to change the regulations regarding the number of cats and dogs allowed to be kept by residents. The previous proposals are in Council File 13-1513 Number of Cats Owned by Residents (still open), and its predecessor, Council File 10-0982 Amend Municipal Code / Number of Cats/Dogs Owned by

Residents (expired). It should be made clear that these files are all related so that the long history of reports and public comments on this topic can be considered.

Furthermore, the current “instruction” has not gone through the channels necessary for appropriate public input. A land use decision such as this should be routed to the Planning and Land Use Management Committee. It should also be heard by the Board of Animal Services Commissioners as the executive authority of the Department of Animal Services. Referral of this land use issue to the Personnel and Animal Welfare Committee for a report from the General Manager of the Department Animal Services is a recipe to hear only a very selective and non-representative view of the issue that is motivated by a desire to dump animals out from the shelters into the community so that they are not euthanized.

Any action to increase in the number of cats per premises (including changes to the definition of the word *premises*) should be addressed in the Environmental Impact Report to be prepared for the proposed Citywide Cat Program (or whatever it is going to be called this time). An increase in the number of cats for lots of a certain size would change the baseline number of outdoor cats in the City of Los Angeles because the City does not have any ordinance that requires cat owners to keep their cats indoors or even from roaming off their properties.

The idea that more cats at a residence on a large lot would have no impacts on the environment or on neighbors is thoroughly faulty. The outdoor roaming area of cats is far greater than 10,000 square feet. Indoor-outdoor cats on a large lot could have greater environmental impacts than on a smaller lot because of the habitat for birds and other wildlife that might be found on a large lot. It is common that residences are built next to each other along a street or road even if the lots themselves might be quite deep and consequently greater than 10,000 square feet. In such configurations the opportunities for nuisance issues to arise are no less than those faced on smaller lots.

It is a flawed approach to consider regulating one element of pet ownership (the number allowed) without considering the other related elements that regulate ownership as a whole. For example, the number of cats allowed per residence should be paired with safeguards to reduce their impacts, such as requirements that cats be kept on the owner’s property, mandatory licensing of cats, and a reasonable relationship between the actual dwelling size and number of allowable cats. These measures and others are used in other jurisdictions in southern California and elsewhere.

The number of animals allowed at a residence should not be tied to the size of the lot. With the exception of large agricultural properties, such regulations should be tied to the size of the dwelling itself if this approach is to be contemplated. For another jurisdiction in the region that has a sliding scale for the number of allowable cats, that number is tied to the size of the residence itself and ranges from 1 for the smallest dwellings to 6 for the largest. Furthermore, that jurisdiction and many others have ordinances in place that prohibit owners from allowing their cats to trespass onto other properties. The City of Los Angeles lacks this basic and common courtesy safeguard.

Any amendment to the cat kennel ordinance relative to second dwelling units also requires review under CEQA. Such an action would have a potentially significant adverse impact on the environment because the City does not have a no-roaming ordinance and any exception to the limit on the number of cats would presumably increase the number of cats allowed per address in single-family neighborhoods, which make up roughly 40% of the land area of the urbanized Los Angeles Basin.

Missing in the repeated attempts by the City Council to increase the number of cats per residence is any attention to or appreciation for the preferences of residents who do not want cats roaming onto their property. The singular and myopic approach on relocating unowned and unwanted animals from City shelters into neighborhoods results in proposals that are unfeasible, unworkable, and environmentally damaging.

Please contact me at longcore@urbanwildlands.org or (310) 247-9719 if you have any questions regarding this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Travis Longcore". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Travis Longcore, Ph.D.
Science Director