

THE SAN MATEO COUNTY PET OVERPOPULATION ORDINANCE: A LEGISLATIVE FAILURE

An Evaluation Of Statistics And Reports

SUMMARY

- Year One of the San Mateo County Pet Overpopulation Ordinance *coincided* with an increase in euthanasia in the affected unincorporated county and a reversal of the prior downtrend, never returning to previous levels.
- The downtrend continued in the unaffected cities.
- The ordinance "findings" were never investigated or shown to exist and are of no significance.
- Unavoidable euthanasia has been decreasing over the last 25 years and cannot be eliminated entirely if any animals are to live in the community.
- The responsible agencies refuse to use quantitative methods to reveal the actual cost of euthanasia.

HISTORICAL TIMELINE OF THE OVERPOPULATION ORDINANCE

- Fall 1990: Peninsula Humane Society campaigned for moratorium on breeding cats and dogs and mandatory spay and neuter. Claimed "10,000 healthy" pets euthanized.
- Board of Supervisors began hearings and adopted modified ordinance with details to be developed.
- Spring-Fall 1991: 2 part Community Animal Control Task Force analyzed existing law, produced "Consensus" and "Minority Reports". Supervisors adopted ordinance
- Spring 1992: Final Ordinance adopted; kennel, cattery and fancier permit items referred to Planning.
- Summer 1992 - Winter 1993: Planning staff and commission developed zoning and planning issues.
- Spring 1993: Kennel/Cattery and Fancier Permit provisions adopted by Board.
- Summer 1994 - Winter 1995: PHS/County sought and obtained adoption of ordinance by cities of San Mateo and Belmont. These versions contained changes from the county ordinance and were not identical to one another.
- Spring 1995: Animal Control Services proposed ordinance amendments.

Evaluation Of The San Mateo County Pet Overpopulation Ordinance

INTRODUCTION

We sought to evaluate elements of the San Mateo Ordinance by obtaining county records on specific provisions prior to and following enactment. We requested fiscal year data, as applicable beginning with FY 1988-89 through 93-94. If boundaries changed we asked that this be noted and if data are not maintained or not available, the reasons why. (Responses did not include reference to any boundary changes, i.e., counting unincorporated city addresses as unincorporated rather than city.)

We addressed a list of questions, keyed to ordinance provisions and set forth below, to each member of the Board of Supervisors with a cover letter requesting the review. By memorandum of March 17, 1995, Connie Urbanski, San Mateo County Animal Control Services Program Manager responded to these questions. These responses have been incorporated below with the original questions. In the following evaluation, "ACS" refers to Animal Control Services. Peninsula Humane Society is "PHS". Other data was obtained independently from county or other public records and sources, as noted. We developed analysis and calculations.

We sought to document specific costs and revenues associated with the ordinance, change in euthanasia numbers and significance thereof, enforcement results and other information to determine whether this has been a cost effective and successful means of reducing the public processing of cats and dogs. This is critical, because 18 cities have not adopted the ordinance. If it is ineffective, it should be discontinued now rather than expanded. ACS has now obtained amendments to the county ordinance based on difficulty of different administration requirements among the administered jurisdictions. With ACS's compliance, the cities of Belmont and San Mateo had already adopted ordinances substantially incorporating the proposed amendments with certain differences from each other as well as the county.

ANALYSIS OF STATISTICS AND REPORTS

TRACKING OF FINDINGS AND PROVISIONS

The ordinance was based on legislative findings of alleged facts justifying use of police power to protect the public. We sought to gauge the efficacy and progress of the programs by comparing data in each fact category of the findings for periods prior to and during enactment:

1) EUTHANASIA STATISTICS BY BREAKOUT CATEGORIES IN USE FOR REPORTING PERIODS

ACS replied that, "the data available prior to the FY 91/92 was not collected in a manner to reflect categorical comparisons accurately." ACS provided only information beginning with FY 91/92 under the prior format and beginning with FY 92/93 in the revised format. We added data from prior years based on a spread sheet we obtained from the City of San Mateo. Following each species, we calculated the percent of change from the prior year.

COUNTY WIDE EUTHANASIA STATISTICS

	Euth. Dogs	%±	Euth. Cats	%±	Dog Lic. (Issued)
1970	15,884		21,796		n/a
1971	20,191	+27%	19,025	-13%	n/a
1972	11,720	-42%	12,323	-35%	n/a
1973	13,113	+12%	12,742	+3%	n/a
1974	9,255	-29%	8,856	-30%	n/a
1975	8,321	-10%	8,413	-5%	n/a
1976	7,108	-15%	6,443	-22%	n/a
1977	6,326	-11%	6,070	-6%	n/a
1978	5,772	-9%	5,624	-7%	n/a
1979	4,349	-25%	4,697	-16%	n/a
1980	3,648	-16%	4,775	-15%	54,100
1981	4,115	+13%	5,461	+14%	51,747
1982	4,292	+4%	6,436	-16%	51,095
1983	4,028	-6%	5,892	-8%	51,018
1984	3,969	-1%	5,434	-8%	50,946
1985: change to FY reporting					52,100
1985-86	3,502	-12%	6,988	+29%	50,458
1986-87	2,807	-20%	7,089	+1%	54,233
1987-88	2,461	-12%	7,409	+4%	51,955
1988-89	2,068	-16%	7,228	-2%	n/a
1989-90	1,738	-16%	7,300	+1%	48,761
1990-91	1,298	-25%	7,080	-3%	50,213
FY 91/92 (Ordinance 3/92)					
Unadoptable	1,256		7,164		
Unwanted	76		253		
Total	1,332	+3%	7,417	+5%	48,393
FY 92/93					
Surplus	598		653		
Unweaned	37		2,372		
Medical	405		1,502		
Wild	5		1,656		
Wolf hybrid/Pit	178		-0-		
Biter	46		24		
Total	1,269	-5%	6,207	-16%	48,663

COUNTY WIDE EUTHANASIA STATISTICS, CONTINUED:

FY93/94	Dogs		Cats	
Surplus	669		936	
Unweaned	36		1,899	
Medical	184		785	
Wild	15		1,492	
Wolf hybrid/Pit	150		-0-	
Biter	57		22	
Total	1,111	-12%	5,134	-17%

UNINCORPORATED SAN MATEO COUNTY EUTHANASIA AND RATES OF CHANGE:

	Dogs		Cats	
1988-89	90		223	
1989-90	72	-20%	212	-5%
1990-91	38	-47%	168	-21%
1991-92	53	+39%	377	+124%
1992-93	77	+45%	437	+16%
1993-94	86	+12%	312	-27%**

* Unincorp. licensed dogs. County +.5% same per. ** Unincorp. cat euthanasias 93-94 were 46% greater than 1990-91, the year prior to implementation, compared to 27% decrease county wide for same period. Any boundary expansion is inconsistent with decreased licenses.

COMPARE COUNTY RATE OF CHANGE/EUTHANASIA VS. UNINCORPORATED

	DOGS: ALL VS. UNINC.		CATS: ALL VS. UNINC.	
1989-90	-16%	-20%	-2%	-5%
1990-91	-16%	-47%	+1%	-21%
1991-92	+3%	+39%	+5%	+124%
1992-93	-5%	+45%	-16%	+16%
1993-94	-12%	+12%	-17%	-27%

Comment: Gross euthanasia numbers for the county have declined exponentially over the past 25 years, and actually increased during the first year the ordinance was in effect. In the affected unincorporated area, euthanasia has increased above years preceding implementation for both dogs and cats.

Substantial numbers of animals handled by public agencies must be destroyed due to safety or humane reasons, as required by state law. The proportion that can be released for the public varies with agency policy and effort. The City and County of San Francisco no longer euthanizes cats and dogs as "surplus". Public euthanasia of a residual number of domestic animals not having slaughter value is unavoidable. This residual euthanasia is not "overpopulation", as these animals are at the end of their useful lives.

Comparing rates of change in euthanasias of both dogs and cats since 1971, we find no statistical basis for a positive causative relationship to the ordinance. The downward rates of change county wide actually reversed upward in the affected area after

implementation and have not yet reached pre-ordinance levels. County wide the largest declines during the ordinance period are in cats. No cat breeding permits have been sold and few cat licenses issued. We find no relationship between these provisions and the declines in cities. We speculate that licensing and breeding permit provisions may have actually caused increased euthanasia for unincorporated county.

2) TOTAL EUTHANASIA COSTS, BROKEN OUT FOR EACH EUTHANASIA CATEGORY, FOR EACH REPORTING PERIOD

ACS stated that euthanasia costs were not available and reiterated the components of operating a euthanasia facility: *"staff time administering euthanasia (daily activity), training (at least quarterly formal training and ongoing on-the-job), selection of animals for euthanasia, stress management, public education, client counseling and dispute resolutions, etc.; fees for disposal of animal bodies; the actual cost of the drugs and materials used for euthanasia; and intangible costs such as those caused by employee/volunteer turnover promoted by euthanasia stress."*

Comment: Euthanasia is a mandated public function for which a contractor is used. As such, it is not unreasonable to determine costs, especially in view of the decreasing utilization and the allegation that cost justifies a controversial ordinance.

3) BREAKOUT AS TO CATS AND DOGS, OF THE FOLLOWING REPORTED INCIDENTS CAUSED BY STRAYS FOR EACH REPORTING PERIOD

- a) disease transmission: no data from ACS
- b) attacks on persons: ACS only compiled state required bite report forms. Bite reports as follows:

	Dogs	Lic. Dogs	%Lic.	(Strays)*	Cats
1990	803	379	47	49	n/a
1991	733	360	49	76	403
1992	792	351	44	82	322
1993	759	350	46	91	290
1994	768	**		**	240

*Data provided by Calif. Dept. Of Health Serv., VPHS.

**VPHS has not prepared 1994 data as yet.

Note: currently 67 dangerous animal permits in county.

- c) attacks on pets: no data from ACS
- d) attacks on livestock: no data from ACS
- e) traffic accidents: no data from ACS

ACS provided "stray" and field return (shown in parentheses) numbers. We calculated the percentage of stray dogs who bite:

COUNTY WIDE STRAYS

	Dogs	% Stray Biters	Cats
1991-92	4,482 (203)	2%	10,249 (12)
1992-93	3,963 (235)	2%	6,760 (7)
1993-94	3,686 (183)	1%	5,789 (15)

f) uncatagorized incidents: no data from ACS

Comment: There is no factual basis for any of the public safety factors cited in the ordinance findings. The number of dog bites by strays has increased substantially during the period, although stray biters as a percentage of strays has decreased along with the number of strays. The percentage of stray biters has always been minute and would never have warranted regulation of the general population.

LICENSING AND PERMITS: FOR EACH CATEGORY, PROVIDE NUMBER ISSUED AND GROSS REVENUE PER CATEGORY, INDICATING RATES IN EFFECT

1) Licensing statistics, broken out by males, females, intact, altered; for cats as applicable:

	Unaltered (\$15)	Altered (\$5)	Revenue
1991-92	Total 180 (no breakdown)		\$ 966
1992-93	65	1,189	5,565
1993-94	55	1,445	5,103

Comment: These are county wide cat licenses. For FY 92-93, Unincorporated cat licenses: 43 unaltered, 330 altered, 373 Total Other cat licenses were distributed among the 20 cities.

2) As to cats, the total cat adoptions from Peninsula Humane Society for each reporting period:

1991-92	1,899	Total licenses issued including renewals
1992-93	1,766	
1993-94	1,862	

3) Any written complaints, refusals or requests for clarification regarding the "not allowed to breed without first obtaining a breeding permit" requirement for the unaltered permit/license. ACS stated *none known and at most 10 queries about breeding permits.*

4) The number of breeding permits issued, broken out as to cats and dogs, including the following categories: ACS did not indicate, however all permits are for dogs. No breeding permits for cats have ever been issued.

Breeding Permits:

a) original issue for permitted animal:

1991-92	3*	
1992-93	34	*9/18/93 report to Board
1993-94	13	of Supes. showed 10

b) consecutive renewal for permitted animal:

1991-92	0
1992-93	0
1993-94	8

c) non-consecutive renewal for same animal: none

5) As to breeding permit conditions and minimum standards, the following:

a) any written complaints by permit holders: None

b) any complaints against permit holders: *one verbal complaint made in March 1994, resolved May 1994.*

c) an explanation of recommendation for repeal of Item 6, requiring written sterilization agreements: *"There is a conflict within the original verbiage. It basically exempts any animals- purpose bred as a concept relates to everything".*

d) an explanation of the consequences of a complaint:

- i) permit revocation
- ii) issuance of future permits
- iii) fine

No response was given.

6) Hybrids: ACS did not indicate whether canine/feline.

(a) current hybrid licensing information broken out as to cats, dogs, intact and altered: *23 intact/26 altered*

(b) whether self-identified by owner or through contact with animal control: *owner and veterinarian.*

(c) procedure for resolution of disputed identification: *licensed veterinarian.*

(d) breeding permits: ACS states *"not applicable"*

Comment: The same principles apply to hybrid cats, including the popular Bengal, and both canine and feline species should be tracked, if any. ACS does not state a method of resolution in case of differing veterinarian opinions. Presumably, some veterinarian would be or has offered such opinions. We would assume that hybrids could be bred without permits or none have applied.

ENFORCEMENT

- 1) Number, if any, of breeding permit revocation proceedings, giving circumstances of complaint, method of investigation and disposition: "None".
- 2) Number of inspections of permitted animals/premises, reasons therefor, method of giving notice, details of inspection process. "None - no complaints received."
- 3) Violations of any ordinance section, broken out as to dogs and cats, by following category:
 - a) number of offenses for each animal or person
 - b) intact/altered
 - c) picked up in field
 - d) impounded from premises or vehicle
 - e) resulting from complaint
 - f) fine/revenue per incident

ACS stated tracking available only in following format:

§3332.4(a) *Unaltered or breeding permit required:*

1991-92	-0-	<i>ASC states these numbers are what is currently available and relate to one breeding animal (each)</i>
1992-93	13	
1993-94	28	

§3332.5(d)(3) *Breeding permit...responsible for 1 year*

1991-92	-0-
1992-93	3
1993-94	3

§3332.5(d)(4) *Advertising*

1991-92	-0-
1992-93	-0-
1993-94	5

§3332.5(d)(6) *Sale or adoption on public street*

1991-92	-0-
1992-93	-0-
1993-94	5

Comment: These reports did not indicate whether persons cited held breeding permits and were cited for violation of conditions and requirements after expiration of the permit. However, nonpermit holders violating permit conditions and requirements would only be cited for unauthorized breeding if they would have been required to

hold a permit for having bred the applicable animal. Only the public sale or adoption provision is a violation independent of breeding permits.

4) A detailed report on Sections 3330.8(b) and (c) (mandatory sterilization for impounds), including:

(a) collection and disposition of deposits

Collections:	1991-92	8	(Total
	1992-93	35	70,
	1993-94	27	44% refunded)

Refunds: 31 for entire reporting period.

(b) number of mandatory sterilizations: 15

(c) number performed by private veterinarian: *none reported.*

(d) any hearings conducted and disposition: 6 hearings;
only one mandatory neuter was upheld.

Comment: Of sterilization deposits collected for unaltered impounds, 56% were NOT refunded. Presumably, the animals -- 39 of 70 -- remained intact. As applicable for 2 impounds within a 3 year period, there were 20 mandatory sterilizations ordered of which 6 were appealed and only 1 upheld (15 actual). 30% of violators appealed. Thus, only 75% of intact multiple impounds were actually altered under the ordinance, and owners prevailed on appeal 83% of the time. Total impounds for the three year period were 34,929 of which .00043 percent were subject to mandatory sterilization. It is likely that this provision has no statistical impact on population and administrative costs exceed revenue. We have no information as to whether these cases resulted from running at large (intended by Task Force) or impounds for other reasons.

FANCIER'S PERMIT (UP TO 10 DOGS/CATS)

1) number issued: *30 active (3/95), 3 pending*

2) complaints and dispositions: *one complaint resulting in revocation.*

3) inspections noticed/performed: *one inspection via complaint with 4 days notice in writing. Three inspections by invitation.*

Comment: The fancier's permit was developed so that persons with multiple animals would be more likely to license and to provide homes for additional animals. The development process included a total review of the kennel/cattery and applicable zoning ordinances, resulting in abolition of commercial kennel provisions. No applications for any kennels or catteries have been made. We learned independently that the revoked permittee, in unincorporated Menlo Park, was involved in humane rescue and had maintained excess dogs previous to permit availability. Considering the exemption of

rural agricultural land, it would appear that fancier permits are benign in community impact.

Note: please show revenue generated per year/per category for each ordinance provision in effect during the period including the allocations to the Animal Population Trust:
ACS did not respond.

ANIMAL POPULATION TRUST

- 1) History of appointments, reappointments, resignations:
Original (5) committee appointed July 1993, informal meeting 9/7/93. Two members resigned. One new appointment.

Comment: The Committee is chaired by the ACS Program Manager, i.e., county staff. Only one member of the Task Force was appointed. Others had no background in or commitment to the purposes of the Fund. Meeting attendance has been poor and sporadic, with meetings canceled altogether or disbanded for lack of quorum. PHS has not directly participated.

- 2) Projects: *"The main focus has been on assisting with spay/neuter surgeries. Requested Board and received permission to disburse funds in May, 1994. Recently developed guidelines on administering funds. Second project has been the next addition of the Animal Services Guide. The Guide is at the printers and will be ready for distribution within the next couple of months."*

- 3) Expenses: *"First Service Guide, FY 92/93: \$3,842.86"*

Comment: The second guide has recently been published. Listings are so minimal as to make the publication of little value as compared to a phone book. A section listing public parks open to dogs was taken from a commercially published book (The Dog Lover's Companion) and duplicates the book's many inaccuracies, e.g. Contrary to the Guide, all parks in Millbrae are open to leashed dogs.

- 4) Use of funds:

- (a) development of programs (include documentation):
"Service Guide was a direction from the Board."
- (b) compliance with intended purpose or need for reevaluation: *"Education and assistance with spay/neuter surgery costs was the major intention for this fund. The committee is working on this goal."*
- (c) procedures for and history of disbursements:
"There have been no other disbursements at this point."

- (d) balance on hand: *Ending FY 93/94: \$18,828.23*
- (e) projected needs and relationship to proposed changes in revenue structure: *"Please see fee changes were originally initiated with this group after much discussion and review of funds available they endorsed the changes."*

Comment: The primary purpose of Trust Fund was to subsidize private sector sterilizations for the following reasons: (a) increase the total number performed in the county; (b) provide locations more accessible than PHS; (c) encourage establishment of veterinary client relationships; (d) provide an alternative to PHS's facility for those who would not use it. The anticipated vehicle for the subsidy was a voucher with development of a list of participating providers. The mechanism for partial reimbursement of providers was to induce veterinarians to participate and allow surgeries to be performed without actual payment of market fees, which can run several hundred dollars for large dogs. The Fund was never intended to support PHS's sterilization program, nor be a source of haphazard grants. The ordinance requires PHS to alter all adoptees as early as medically possible (now 8 weeks) and that cost is supported by the contract, PHS's nonprofit activities and the adopters. Other PHS users do pay fees. Application of these funds to PHS surgeries requires a new analysis and suggests designation of specific user categories such as feral cats, "mandatory" procedures or special campaigns.

RELATIONSHIP TO CITIES

- 1) County staff role in promoting ordinance: *"Under direction of the Board, promotion of cities to adopt the ordinance is a major goal."*
- 2) Staff time and related costs: *"I have attended all city council meetings on my own personal time."*
- 3) Rejections by cities: *"There have been no rejections from cities since I became Program Manager."*

Comment: Agenda Report of April 6, 1993, to Brisbane City Council from Police Chief Hitchcock stated, "Though we have decided not to adopt the "breeding ordinance" chapters of the County ordinance, I have enclosed copies of them for your information." A San Bruno council member (oral communication) reported that the San Bruno Council refused to consider the ordinance in early 1995. PHS has campaigned through letter writing programs, media and other means to have the ordinance adopted by cities. Both PHS and ACS encouraged the City/County Task Force members (all employees, not citizens) to work for enactment. ACS replies that the cities "wanted to wait until there were two full years of stats..."

- 4) Reasons for promoting amended versions to cities prior to

presentation to County, including fee reductions in unaltered permit/license: *"The cities wanted two years of statistics before they would entertain adopting the ordinance. Two cities requested information and went forward. The changes in the ordinance have been in the works since the summer of 1994. The review by many groups, County Counsel, and the re-numbering of the County's entire ordinance system delayed the item being put on the Board's agenda. There is no "hidden agenda" here."*

Comment: The cities did not pursue the ordinance of their own initiative but in response to concerted lobbying, including a spread sheet of projected savings and revenues based on adopting specific ordinance provisions. ACS's division projections over the last decade have exceeded actuals.

- 5) Justification for asking County to reduce fees for ease of uniform administration when County staff helped induce the two enacting cities to adopt different fees: *"I did not induce any city to adopt the ordinance. They requested information and I provided it. The uniform licensing rates have been discussed for the last two years. It is a nightmare to administer. The overall change also provides for \$.50 per licenses regardless of where an individual lives, or whether or not their animal is intact, to be deposited into the Trust Fund to assist with spay/neuter surgeries and education throughout the County."*

Comment: The most efficient way to achieve uniform administration would be for the county to conform its fees to those of 18 cities rather than adopt fees different from all cities and expect 20 cities to change. There has been no justification for funding the Trust Fund at this level (currently Belmont and San Mateo are at \$1.00/license, the county \$5.00 for intact only and 18 cities nonparticipating).

ACS RECOMMENDED CHANGES

Please detail each change and the reasons therefor. If change effects revenue, please calculate projections for all affected categories. ACS stated that these were contained in a memorandum to the Board of Supervisors dated March 17, 1995.

- 1) Regarding the questions of legally licensing hybrid cats or dogs in California, the attached "California Compendium of Rabies Control, 1995, California Department of Health Services, Veterinary Public Health Section", faxed March 15 from DHSVPS.

Comment: This Compendium is the opinion of its authors at DHSVPHS and neither accurately reflects state law nor has the force and effect of law or regulation.

2) A memorandum to the Board, dated August 18, 1993 was attached as an example of reporting. Points made:

- Drop in numbers received/ethanized at shelter
- Opinion that education/awareness is cause, not Ord.
- Nightmare of administering different fees for unicorp.
- Hope for passage of state cat rabies/licensing
- Impossible to locate cat owners without license ID

Comment: Recent attempts to mandate cat licensing and rabies vaccination in the state legislature as well as through the Department of Health Services have failed.

Owners of lost cats do look for them at the shelter, by posters and advertisements. Unowned stray cats, the majority of the shelter population, have no owners to search for or reclaim them, purchase licenses or obtain veterinary care.

3) Copy of "Budget Request Worksheet" dated 1/3/95. was attached in place of accounting requests. This lists fund balance categories with no explanations.

Comment: This does not reflect revenue specific to ordinance provisions, such as breeding permits, fancier permits or specific violations, nor indicate the status of the Trust.

4) A statement that written letters from The Peninsula Humane Society Community Liaison Committee, the Peninsula Veterinary Medical Association and the Animal Population Trust Fund endorsing respective proposed amendments are on file. ACS did not provide copies of such letters but did provide copies of minutes of the Trust Fund Committee (meetings of 1/18/94 and 6/20/94) as *"indicating that they endorse the fee changed as well as other items in the proposed amendments"*.

Comment: The minutes do document mention of proposed license fee changes and possible exemption of cat feeders from licensing. However, these minutes contain no record of any committee action constituting endorsement or review of proposed amendment language. Ms. Urbanski chairs the Committee and prepares the minutes. The Liaison Committee is chaired by PHS Executive Director Kathy Savesky and discusses a planned topic at quarterly meetings. No proposed ordinances have ever been presented or considered, nor has any type of action been taken, including authorization for any endorsement. (See NOTE below)

The proposed wolf hybrid registration process would resolve identification questions on the opinion of a licensed veterinarian. Since there are no scientific means to make such identifications and extra-label use of biologics issues are involved in this area, documented and comprehensive professional group acceptance of these specific legal responsibilities seems problematic. (Adopted 5/16/95 by Supervisors; registration fee equal to dog license fee.)

PENINSULA HUMANE SOCIETY COMMUNITY LIAISON COMMITTEE

The Peninsula Humane Society Community Liaison Committee was an indirect result of the ordinance. Due to public complaints about the exclusionary philosophy of PHS as a public contractor and PHS's refusal to change its policies to become more inclusive of the spectrum of community values, the County negotiated creation of this committee as part of its animal control contract. While the operation of the Committee has allowed somewhat more access to PHS by interested persons who had previously been systematically excluded, PHS has sole control over selection of members (there are designated categories based on the contract and only approval right for the County) and all aspects of operation. Meetings consist of PHS presenting materials supporting its point of view and conducting informal discussion. Nonmembers may communicate in writing or by submitting a speaker slip for a 3 minute speaking allowance. The Committee has become a vehicle for PHS's interests and a means for it to augment its own support at the expense of community values. For example, PHS presented their own "Feral Cat Coop" program as a voluntary joint effort whereby cat feeders would receive support services in exchange for meeting PHS requirements. Shortly thereafter, the ordinances containing cat feeder registration surfaced with claims that the Committee endorsed the proposed law. Had the committee actually reviewed any laws or proposed laws, they might have uncovered various flaws such as lack of definitions, etc. Using the Committee as an attribution, PHS developed its own version of a rental housing program which requires sterilization for tenant pets. While committee members are well meaning in volunteering their time and attention, attendance is sporadic. Most members have little knowledge of existing law, applicable agencies or animals generally beyond their personal involvement.

RECOMMENDATIONS

- Repeal breeding permits and unaltered permits.
- Repeal cat licensing.
- Repeal all non-commercial limit laws for dogs and cats.
- Do not enact hybrid or feral cats amendments.
- Emphasize basic, affordable dog licensing for rabies prevention, identification and reliable revenue.
- Implement subsidy plan for private vet sterilizations.
- Establish a public animal commission reflecting the broad spectrum of community values, to act as an overseer of animal control, a forum for public complaints, an evaluator of animal control data and advisor to the Board of Supervisors.