

Communication from Public

Name: The American Kennel Club
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Council File No: 23-1008
Comments for Public Posting: Please see attached. Thank you.



AMERICAN
KENNEL CLUB®

March 28, 2024

Re: American Kennel Club Comments on Proposed Breeder Permit Suspension

Dear Chair Hernandez and Members of Neighborhoods and Community Enrichment Committee:

The American Kennel Club (AKC) writes today on behalf of our local Los Angeles based kennel clubs and the many responsible dog owners in the city to respectfully ask you to not proceed with any proposal that would lead to a suspension of animal breeding permits. AKC cares deeply about the conditions and the welfare of *all* dogs, including ones languishing in Los Angeles's animal shelter system. We stand ready to be a part of a comprehensive solution and offer several steps below that would meaningfully address the very real problems that exist in the city shelter system.

Simply blaming registered, responsible breeders for conditions in area animal shelters will in no way improve animal shelter populations; this proposal will have a significant negative impact on dog owners and the local community. Furthermore, AKC believes current law is not being implemented correctly, which is likely leading to inaccurate and misleading data that is then being used as justification for this proposal (see more below).

We respectfully ask that you consider AKC's concerns:

- Los Angeles Municipal Code Section 53.15.2 already requires all persons within the City of Los Angeles to have their dogs over the age of four months spayed or neutered. In the alternative, a person must provide valid written documentation to the General Manager of Animal Services to prove that the animal: (1) is a competition dog; (2) is, or is being trained to be, a guide, signal, or service dog, or is in a breeding program for those purposes; or (3) is, or is being trained to be, used by a law enforcement agency or the military for law enforcement, military, or rescue activities. **If determined to satisfy one of those requirements, then, according to Animal Service's website, an owner of an intact dog must pay both the \$100 intact dog license and the \$235 breeder's permit, regardless of whether the owner has no intention of breeding the animal. AKC has strong concerns with Animal Services placing the additional burden on those purchasing an intact animal permit to also purchase a breeding permit, *although such a requirement does not exist in current law*. This situation has been exacerbated by recent public comments by city officials detailing this *administrative policy that does not comport with current law*.**
- **To reiterate, it appears that those who wish to keep a dog intact in Los Angeles are required to maintain both an intact dog license and a breeding permit, though such a requirement does not exist in current law.** As a result of this policy, the City of Los Angeles is likely issuing more breeding permits to city residents than would otherwise be the case if existing law was being correctly implemented. This arbitrarily inflated number of breeding permits is then being used as the cause for overcrowding in the animal shelter system. Additionally, assuming both the license and permit are otherwise required in tandem, a moratorium on issuing breeding permits would result in a moratorium on the issuance of intact dog licenses, which would effectively outlaw the keeping of any intact dogs in Los Angeles when current licenses and permits expire, unless and until shelter occupancy rates fall below an adopted threshold. AKC encourages the City to consider other potential legal and constitutional ramifications a moratorium may present, particularly if it would demand those who would have otherwise sought and acquired an intact dog license and a breeder's permit to submit their dog to an irreversible and invasive permanent surgical alteration.

- **Responsible breeders are models for their communities. They raise healthy dogs and work to ensure that puppies are placed with appropriate owners, even agreeing to take dogs back if a home does not work out, instead of placing them in a shelter where they are cared for at the taxpayers' expense. These breeders are in a unique position to support new pet owners and teach them to be responsible dog owners. In addition, many breeders are providing quality dogs not just to be wonderful family pets, but also to act as service, working, and search and rescue dogs.**

Breeders have worked for decades to establish quality breeding programs that produce well-bred, healthy dogs. We encourage you to not overregulate and further burden responsible breeders who have been providing quality, well-bred pets to the community for many years because, unfortunately, as the Department of Animal Services has acknowledged, there are already a number of unlicensed breeders in the city. The city does not need more unlicensed, lower quality breeders at the expense of community-minded, responsible breeders.

- AKC believes inclusive public outreach and education are key to promoting and instilling a culture of responsible pet ownership. If the Los Angeles Department of Animal Services seeks to increase the prevalence dog owners spaying or neutering their dogs, resources should instead be directed toward making sure low-cost spay/neutering programs are both fully funded, and the service is known to city residents. Nothing will ease the strain on the shelter system more than a culture of responsible pet ownership.

The AKC understands the issues facing Los Angeles' animal shelter system. To lessen the strain on the system and to promote the welfare of all animals in the system, AKC proposes the following recommendations:

- Ensure good data collection to determine where issues are originating and allow for arising problems to be adequately addresses.
- Require all animals received in the shelter system to be checked for microchips so lost pets don't languish in shelter system taking up valuable space and resources.
- Make sure low-cost spay and neuter funds are available to all who need it and ensure that program availability is widely known through community outreach.
- Consider offering tax credits or other programs to incentivize greater acceptance of pets in residential housing to address issue of pets ending up in shelter system only because of housing issues.
- Develop a plan to manage "dangerous dogs" taken in and kept in the shelter system.

We appreciate the Los Angeles Neighborhoods and Community Enrichment Committee's attention to this issue and for their passion for the welfare of animals. Thank you for reviewing and considering our concerns and recommended amendments on this proposed ordinance.

Regards,



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