

Sayers, Margery

From: Mara Hurwitt & Sam Cox <kabukibun@verizon.net>
Sent: Monday, February 1, 2021 9:03 PM
To: CouncilMail
Cc: Wimberly, Theo; Sayers, Margery
Subject: Comments on CB 1-2021
Attachments: CB 1-2021 Testimony, Hurwitt.pdf; written comments on Howard County CB 1-2021.pdf

[Note: This email originated from outside of the organization. Please only click on links or attachments if you know the sender.]

Good afternoon,

Attached please find a copy of my public testimony on behalf of Friends of Rabbits concerning CB 1-202 from the January 19 County Council meeting and also additional written comments on the proposed legislation.

Thank you.

Sincerely,
Mara Hurwitt
Vice President, Friends of Rabbits

HOWARD COUNTY COUNCIL PUBLIC HEARING
January 19, 2021

Testimony Regarding CB 1-2021
Mara C. Hurwitt, Vice President, Friends of Rabbits

Good evening. I'm Mara Hurwitt, Vice President of Friends of Rabbits, a domestic rabbit rescue headquartered in Columbia and operating in the greater Washington DC metro area.

We share your concerns regarding unregulated private animal shelters, and concur with the intent behind this bill. We take in many rabbits seized in neglect cases, including one from a private shelter in Howard County that required thousands of dollars of veterinary care due to an untreated infection that had abscessed. Her eye was saved only thanks to the outstanding skill of one of the top exotics vets in the region, Dr. Scott Stahl.

Overall, we support the proposed bill. We have no objections to the application procedures, annual license fee, or inspections.

We do, however, have concerns with a few of the provisions, which were clearly drafted with dogs and cats in mind. These particular provisions are either inappropriate or excessively burdensome for an animal rescue such as ours.

(N) STANDARDS OF CARE FOR PRIVATE ANIMAL SHELTERS.

DISEASE PREVENTION AND SANITATION PRACTICES.

Paragraph (4) requires that all animal enclosures and bowls be cleaned daily. Our rabbits are kept in large intake cages then moved to puppy exercise pens. We clean the enclosures, litter boxes, bowls, etc. three times a week – which is more often than most rabbit owners. Daily cleaning is unnecessary and we simply do not have the manpower. We ask for appropriate flexibility for shelters caring for animals other than dogs and cats.

MEDICAL STANDARDS.

Paragraph (6) requires that a veterinarian supervise the medical care and treatment of animals. We believe this needs clarification.

We examine all rabbits upon arrival. Any rabbit that exhibits signs of illness or injury at intake or at any other time is taken to a qualified exotics vet for evaluation and treatment. However, as a small foster-based rescue, we do not have a vet on site to assess each animal at intake. Such a requirement is unnecessarily burdensome and would be financially unsustainable for most rescue groups.

STRAY ANIMALS.

Paragraph (8) Stray rabbits are very different from stray dogs. The overwhelming majority of them are intentionally abandoned by their owners and have been living as strays for weeks or months. Very few are microchipped. Therefore, the scanning and 30-day hold provisions are

inappropriate and costly for rabbits. We have no objection to reporting stray animals to the Howard County shelter. Most importantly, this provision should be amended to make clear that it applies only to stray animals caught within Howard County.

RECORD KEEPING.

Paragraph (9) requires a health certificate for animals entering from out of state. As a regional organization, we regularly move rabbits between Maryland, Virginia, and DC. We ask that this requirement be revised to exclude animals coming from Virginia and DC.

We support the bill with these reservations, and request revisions to provide the necessary flexibility for rescues such as ours.

In addition to working with the Howard County Shelter, we routinely pull rabbits from several animal shelters in Maryland and Virginia. By relieving shelter overcrowding and having all our rabbits spayed and neutered – which many of the region’s shelters do not – we play an important role in promoting adopt don’t shop and reducing the number of shelter animals that are euthanized. We ask the Council to make the requested amendments to help us continue our work supporting the regions shelters and the community.

Thank you.

WRITTEN COMMENTS REGARDING CB 1-2021,
AN ACT TO REGULATE PRIVATE ANIMAL SHELTERS IN HOWARD COUNTY, MD

Submitted on behalf of Friends of Rabbits, Inc., a 501(c)(3) animal rescue

Friends of Rabbits supports the County Council's efforts to regulate private animal shelters in order to combat animal neglect and ensure that shelters comply with basic standards for animal care. However, we strongly recommend that the proposed legislation be returned to a drafting committee for revision, and that the committee include representatives of several of the organizations that would be subject to the Act.

Our main concerns were presented in the public testimony presented by our Vice President Mara C. Hurwitt at the January 19 Council hearing on CB 1-2021. (A copy of that testimony will be submitted along with these comments.) However, due to the 3-minute limit on testimony, we were not able to present all our comments and recommendations at the hearing.

The Act takes a "one size fits all" approach that is unsuitable for the different types of private entities it seeks to regulate. It is unclear whether foster-based animal rescues such as ours will even be subject to the Act. We maintain a headquarters at a private residence in Columbia, Maryland, where we intake and quarantine a small number of rabbits at a time and also house some of our rabbits available for adoption; however, most of our foster rabbits are cared for in individual private homes in Maryland, Virginia, and the District of Columbia. Does the presence of our headquarters in Howard County bring us under the Act, or does the fact that we keep most of our rabbits in foster homes outside of the County exempt us?

The Act was clearly drafted with dogs and cats in mind, and some of the provisions are either inappropriate or unnecessarily burdensome for small mammal, avian, or reptile rescues/shelters. These include some of the housing and cleaning requirements, as well as provisions for dealing with stray animals. These concerns were largely addressed in Ms. Hurwitt's testimony, but we wish to reiterate that those portions of the Act need to be revised either to exclude "exotics" (i.e., animals other than dogs and cats) or to create separate, species-appropriate provisions.

The requirements for dealing with stray animals should be revised to explicitly state that the provisions apply only to strays caught within Howard County. Many of the small animal and breed-specific rescues (which may or may not fall under the Act) operating in Howard County are regional and accept animals not only from outside the County, but from outside of Maryland. While it is appropriate for the County to impose animal care requirements on any animal housed within the County, requirements for reporting and holding strays brought from outside the County should be reserved to the jurisdiction where each animal is caught. For species other than dogs and cats that are caught as strays within Howard County, a

requirement to report the possession of the animal to Howard County Animal Control should be sufficient.

Requiring microchip scanning and 30-day hold periods for stray rabbits would be both unnecessary and excessively expensive for a small rescue. As mentioned in Ms. Hurwitt's testimony, "stray" rabbits are almost always intentionally abandoned by their owners. Pet rabbits do not escape by running out the front door like dogs or cats. Rabbits housed (inappropriately) in outdoor hutches sometimes do escape, but if their owners care to have them back, they will ask neighbors, distribute lost pet flyers, post on electronic bulletin boards like Next Door, and/or call the local shelter. Those rabbits are quickly reunited with their owners. The stray rabbits that end up in shelters and rescues have been living "feral" for weeks or months, managing to elude predators and cars (many, sadly, do not) before they are caught by Good Samaritans. No one is waiting anxiously for their return.

Based on our concerns as well as the testimony of other individuals, we believe that the best course of action would be to withdraw CB 1-2021 from consideration at this time and return it to committee for revision. Involving the entities you propose to regulate in the drafting of the Act will result in better legislation that creates more effective and equitable regulations while achieving our shared goal – better care for animals in private shelters without imposing undue burdens that might force reputable animal shelters and rescues to close their doors. We would be happy to participate in such an effort.

Thank you.

Sincerely,
Board of Directors, Friends of Rabbits

www.friendsofrabbits.org
10706 Vista Road, Columbia, MD 21044
P.O. Box 1112. Alexandria, VA 22313-1112

info@friendsofrabbits.org