

## 1.1 Final EIR Organization

This Final Environmental Impact Report (EIR) has been prepared by the City of Los Angeles, Department of Public Works, Bureau of Engineering (City) to assess the potential environmental impacts that could result from the implementation of the proposed Citywide Cat Program (proposed Project) in Los Angeles, California. The City is the Lead Agency for the proposed Project, pursuant to the California Environmental Quality Act (CEQA).

In accordance with CEQA, the Draft EIR and supporting appendices (State Clearinghouse Number 2013101008) together with this Final EIR, and the record of proceedings of the City, comprise the Lead Agency's CEQA environmental analysis of the Citywide Cat Program. Numerous references are made throughout this Final EIR to the Draft EIR and to the Draft EIR appendices. These documents were circulated previously and are not being reproduced. Copies, however, are available for review at the Department of Public Works, Bureau of Engineering, and remain available at the City's website: <https://eng.lacity.org/citywide-cat-program-e1907610>.

The abbreviated format used for this Final EIR complies with State CEQA Guidelines, Section 15132.

This Final EIR is organized as follows:

- Chapter 1 – Introduction
- Chapter 2 – Response to Comments
- Chapter 3 – Modifications to the Draft EIR
- Appendices

The Final EIR appendices are identified as follows and are in addition to those already included in the Draft EIR.

- Updated Appendix J – Cat Population Modeling
- Updated Appendix K – Free-Roaming Cat Density Data Table
- Appendix O – Notice of Availability and Newspaper Notice
- Appendix P – Public Hearing Transcript, Speaker Cards, and Sign-In Sheet
- Appendix Q – Public Comments on Draft EIR: State and Local Government Agencies
- Appendix R – Public Comments on Draft EIR: Non-Profit Organizations and Neighborhood Groups
- Appendix S – Public Comments on Draft EIR: Interested Parties and Individuals
- Appendix T-1 – Public Comments on Draft EIR: Interested Parties and Individuals – Form Letter Category 1
- Appendix T-2 – Public Comments on Draft EIR: Interested Parties and Individuals – Form Letter Category 2

- Appendix T-3 – Public Comments on Draft EIR: Interested Parties and Individuals – Form Letter Category 3
- Appendix T-4 – Public Comments on Draft EIR: Interested Parties and Individuals – Form Letter Category 4
- Appendix T-5 – Public Comments on Draft EIR: Interested Parties and Individuals – Form Letter Category 5
- Appendix U – Public Comments on Draft EIR: Draft EIR Public Hearing

## 1.2 Proposed Project

The proposed Project<sup>1</sup> analyzed in the EIR would be implemented citywide (see Figure 2-1 in the Draft EIR) and is guided by actions by the Board of Animal Services Commissioners (Board) and the Los Angeles City Council (see Appendix D). To assist in the implementation of the City’s no-kill policy and reduce the relative population of free-roaming cats in the City, the Department of Animal Services (Department; Los Angeles Animal Services [LAAS]) proposes to:

- a. Directly engage in spaying or neutering, or make the spaying or neutering of cats more affordable by allowing the City to provide funds by means of free or discounted spay or neuter coupons or other City, public, or grant funds to subsidize the spaying and neutering of any cat in the City of Los Angeles to prevent them from having litters of kittens, regardless of the cat’s status as either owned pet, stray, or feral. This includes spay and neuter of free-roaming cats that may be returned by their caretakers or a rescue organization to where they were found, relocated to a working cat program (WCP),<sup>2</sup> or adopted.
- b. As part of changing the City of Los Angeles Administrative Code (LAAC) (Section 5.199), broaden the permitted use of Animal Sterilization Fund monies from “pet sterilization” (current language) to “animal sterilization.” Currently, Section 5.199 of the LAAC limits the use of funds for sterilization of “pets.” The proposed amendment would allow use of funds to sterilize pet, stray, or feral cats. The proposed Project would allow the LAAC’s Animal Sterilization Fund to also be used to spay or neuter free-roaming cats in the City. However, no monies intended to spay or neuter pet cats in the City would be reduced.
- c. Implement a modified trap, neuter, and return (TNR) program that includes the following elements:
  - i. Declaring that TNR is the preferred method of addressing the free-roaming cat population and the City’s official policy.

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<sup>1</sup> As set forth more fully in this Final EIR, including the modifications discussed in Chapter 3 of this Final EIR and in the responses to comments in this Final EIR, the proposed Project has been modified based on the comments received to clarify project elements and, in some cases, further minimize already-analyzed, less-than-significant project impacts. Because the project revisions do not result in a new significant impact, a substantial increase in the severity of an impact requiring mitigation measures, or a considerably different feasible alternative and mitigation measure, and would not otherwise meet the recirculation requirements under CEQA Guidelines Section 15088.5, recirculation of the EIR was not necessary. The proposed Project, as revised, is summarized in this Section 1.2.

<sup>2</sup> The placement of cats in warehouses and barns with rodents is commonly referred to as a “working cat program,” with many being indoor cats only.

- ii. Collaborating with organizations experienced and engaged in TNR and using animal services centers to provide information and training to citizens who wish to participate in TNR.
  - iii. Implementing outreach by including links to TNR organizations on the LAAS website and directly referring the public to organizations for information on TNR.
  - iv. Implementing a policy regarding free-roaming cat complaints that involves informing the complainant about the benefits of TNR and referring them to TNR organizations. LAAS will encourage that cats not be brought into local animal services centers, except if the cat is injured or sick, the cat has bitten someone, the cat's welfare is in jeopardy, there is a public health hazard, or the potential exists for harm to people or companion animals.<sup>3</sup>
  - v. Using incentives, vouchers, and waived cat trap rental fees to encourage the capture, sterilization, and release of free-roaming cats.
- d. Release free-roaming cats that have been spayed and neutered from animal services centers' custody to TNR groups that may have the intent of returning the animal to free-roaming status, unless the cat is a nuisance cat. In order to encourage more adoptions and meet the City's no-kill goals, the currently permitted number of cats per household would be changed from three cats to five. This would involve an amendment to the Los Angeles Municipal Code (LAMC) regarding the definition of "cat kennel" to exclude any location where five or fewer cats are kept (the current limit is three cats). Currently, LAMC Section 53.50 requires a permit from the City to "conduct or operate within the City of Los Angeles any dog kennel, cat kennel, zoo, animal rental establishment, animal grooming parlor, riding academy, livery stable, boarding stable, pony ring or pony ride, horse market, mule market, circus, rodeo, etc." Any household with more than three cats would be subject to the following restrictions (this action would require an amendment to the LAMC):
- o All the cats must be kept indoors at all times,
  - o All the cats must be microchipped and sterilized, and
  - o The household must be registered with the Department as having more than three cats.
- e. Publish and implement program guidelines that highlight best practices when conducting TNR under the proposed Project.
- f. Create a public education and outreach campaign that would focus on growing public awareness of the existing impacts of the free-roaming cat population on wildlife, habitat, and public health.
- g. Create a City of Los Angeles WCP to facilitate the relocation of free-roaming cats from the streets and into indoor/enclosed sites. The City's WCP would prioritize admission of cats found in or near Environmentally Sensitive Areas (ESAs), in unsafe locations, or when it is undesirable to return a free-roaming cat to its found location (nuisance cats, including cats found near water bodies impaired for bacteria and/or nutrients).

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<sup>3</sup> Current nuisance cat protocol as described in Section 2.2 of the Draft EIR will remain unchanged by the modified TNR Program described here, aside from the opportunity to enroll the cat in the City of Los Angeles WCP, as space allows.

## 1.2.1 Modified TNR Program Implementation

LAAS currently does not perform targeted spay and neuter services on free-roaming cats. Any stray cats that are past their holding period and altered by LAAS must be friendly and able to be handled; otherwise, they are not fixed. LAAS does not sterilize feral cats.

Upon implementation of the modified TNR Program, LAAS will release a Task Order Solicitation to an existing list of pre-qualified spay and neuter veterinarians for those willing and able to participate in the spay/neuter program for free-roaming cats. Upon selection of service providers, LAAS will issue a notice to proceed with funding authorization for at least 20,000 free-roaming cat sterilizations and related medical treatments (based on availability of additional funding) annually. LAAS currently has a voucher program in place for owned cats, which will be adjusted to include the free-roaming cat spay/neuter program. Each voucher will cover the costs associated with spaying or neutering a free-roaming cat. The City Council has assigned the value of \$70 to the free vouchers, reimbursable to the City's veterinary partners for spaying and neutering shelter cats per surgery (C.F. 16-0114). If additional City funding is available, the rabies and feline viral rhinotracheitis, calicivirus, and panleukopenia virus (FVRCP) vaccine should be administered, along with flea treatment, at the time of sterilization. If City funds are not available to cover these additional services, participants in the modified TNR Program will be encouraged to cover these services.

Individuals and organizations wishing to participate in the LAAS free-roaming cat spay/neuter program must register with LAAS as an authorized participant. This will entail signing an agreement stating that each cat the participant submits for a free spay/neuter voucher had been trapped and released within the City of Los Angeles limits. A unique identifier will be provided to each cat submitted under the program to receive a spay/neuter voucher. This unique identifier will be alphanumeric and begin with the letters FR, which will serve as an abbreviation for the term free-roaming. The newly implemented unique identifier specific to this program will allow for fiscal and data analysis, which will enable LAAS to monitor and track data specific to the free-roaming cat spay/neuter program. Each free-roaming cat should be sterilized and ear-tipped. Microchipping, vaccinations, deworming, and flea treatment are also recommended if funding is available.

The City understands that working with free-roaming cats requires special expertise, and while individuals are encouraged to participate, responders to the Task Order Solicitation on behalf of organizations will be asked to demonstrate their expertise by sharing their experience in participating in TNR work and facilitating the sterilization of free-roaming cats. These organizations will be asked to document the number of free-roaming cats in the City that they have sterilized annually through TNR efforts in the past. If selected, these organizations will be asked to commit through an affidavit to sustain this level of effort to help ensure that the City vouchers would be additive to free-roaming cat sterilizations occurring within the City.

## 1.2.2 Program Implementation Guidelines

This section presents the guidelines developed for implementation of the Citywide Cat Program.

As set forth in the analysis of environmental impacts, no significant environmental impacts were identified in the analysis of the proposed Project. The program implementation guidelines are intended to highlight best practices when conducting TNR under the proposed Project. LAAS will distribute a copy of these guidelines to those who receive vouchers under the proposed Project, publish them on its website, and include a map of ESAs mentioned herein to educate the public and

facilitate implementation of these best practices. Note that as these guidelines are part of the proposed Project, they are not mitigation measures as defined under CEQA.

Recipients who receive vouchers from the City for free-roaming cat medical and spay and neuter services will be expected to commit to the guidelines by signing an affidavit declaring their intent.

### **1.2.2.1 Free-Roaming Cat Trap/Neuter/Return Guidelines**

- The City shall create partnerships with third parties who offer free-roaming cat trapping trainings so people can learn how to trap responsibly.
- Traps should be monitored at all times and partially covered once occupied.
- If a free-roaming cat is trapped in an ESA, it is recommended that the cat be enrolled in a WCP, based on availability, or adopted through a rescue group if possible. If these options are not available, the cat should be returned to the ESA.
- If trapping in or near an ESA, avoid undisturbed areas and vegetation; traps should be placed on paved or developed areas.
- Maps of ESAs in the City shall be provided for reference in the City shelters and on the LAAS website for downloading and printing.
- Where feasible, to avoid potential interactions/conflict with vulnerable populations (children, the elderly, and those with compromised immune systems), trapping should not occur in proximity of individuals from such populations.
- Trapping locations should be kept clean so that no traces of food, refuse, or fecal matter are left behind after trapping events. Contaminated surfaces should be disinfected as needed to help maintain cleanliness and contain the potential spread of disease. Gloves should be used when handling traps. Wash hands and clean equipment afterwards.
- Free-roaming cats should be sterilized and ear tipped. Microchipping is recommended if funding is available. Free-roaming cats that will be placed in a WCP will be microchipped.
- At the time of sterilization, the rabies and FVRCP vaccine should be administered, along with flea treatment and deworming.

### **1.2.3 Public Education and Outreach**

To help grow public awareness of the existing impacts of the free-roaming cat population, LAAS would initiate a broader public education and outreach campaign. This would include messaging about the biodiversity of Los Angeles, the City's biological resources and sensitive habitat areas, and how wildlife and habitat is affected by the existing free-roaming cat population. LAAS will look for opportunities to collaborate and partner with public agencies and non-profit organizations, including wildlife and cat advocacy groups, to raise public awareness about these issues. The campaign would also identify tools and approaches that the public can use to help control the impacts from pet overpopulation, specifically free-roaming cats, on public health and wildlife by ensuring, for example, that pets are sterilized, provide on-going flea treatments, and prevent fecal accumulation.

The public education program, intended to help address the existing impacts of the free-roaming cat population, may include information regarding the responsible feeding of free-roaming cats related

to existing feeding activities. There is an existing condition of feeding of free-roaming cats. The City is trying to balance the humane treatment of animals with addressing the existing impacts of pet overpopulation. Public messaging would encourage existing feeders to fix those cats, and encourage them to participate in the Citywide Cat Program, and emphasize no new feeding. Additional targeted messaging to existing feeders would be “please follow best practices regarding cleanliness, feeding times, etc. to manage existing impacts of free-roaming cats related to public health and wildlife.” LAAS would tell the general public that feeding is not encouraged and to “please don’t start feeding if you don’t already,” and would explain the potential impacts on wildlife from these practices.

Noticing efforts about the Citywide Cat Program, including code updates, the TNR program, related guidelines, the WCP, and the public education campaign could occur in a variety of ways, including through press releases, posting on the LAAS website, posters at City shelters, fliers, mailers, radio advertisements, and social media posts and ads. The information shared will be multilingual as needed. Opportunities for partnering with organizations and institutions to amplify these messages will also be explored.

Community engagement can occur through community meetings hosted by local City shelters and prior to mobile clinics. City shelter volunteers will learn about the Citywide Cat Program and program implementation guidelines through shelter orientations and the volunteer onboarding process.

## **1.2.4 Proposed City of Los Angeles Working Cat Program**

### **1.2.4.1 Existing Efforts**

Currently, several non-profits within the City of Los Angeles (e.g., Best Friends, Kitty Bungalow, Paw Mission, and others) work to facilitate the placement of free-roaming cats that are not good candidates for traditional adoptions into “working cat” situations where they serve as rodent and pest deterrents. Such arrangements aim to help to reduce the rate of euthanasia in homeless cats in Los Angeles. These efforts would benefit from additional support (e.g., funding, dedicated staff, advertising) to help create additional opportunities to relocate free-roaming cats.

The City of Los Angeles proposes a WCP to facilitate the relocation of free-roaming cats from the streets and into indoor/enclosed sites. The City’s WCP would prioritize admission of cats found in or near ESAs, in unsafe locations, or when it is undesirable to return a free-roaming cat to its found location (nuisance cats, including cats found near water bodies impaired for bacteria and/or nutrients).

### **1.2.4.2 Working Cat Opportunity Sites**

Potential working cat opportunity sites within the City that could host working cats include residential backyards with enclosed structures (including “catios”), barns, stables, warehouses, factories, industrial parks, churches, wineries, breweries, and City facilities, such as police stations, libraries, and fire stations.

### **1.2.4.3 Criteria for Appropriate Locations**

Ideal locations for working cats would be:

- Sites that are not within known ESAs;
- Enclosed spaces that do not include routine interactions with vulnerable populations, such as children, the elderly, or those with compromised immune systems; and
- Sites where a caregiver is available to provide daily food and water and refresh a litter box.

### **1.2.4.4 Adoption Process**

Placements through the City's WCP would be treated as no-fee adoptions. Free-roaming cats placed through the program would be sterilized, ear-tipped, microchipped, vaccinated for rabies and FVRCP, treated for fleas, dewormed, and placed in pairs.

Adopters would complete an adoption agreement to host the cats within an enclosed space and provide daily food and water and future medical treatment as needed, including regular treatments for fleas and parasites. Food would be provided in compliance with responsible feeding guidelines and at an indoor location to minimize attraction of wildlife. A litter box must also be provided. Adopters would be trained regarding the rehoming process and commit to spending the suggested time helping the cats become familiar with their new home.

### **1.2.4.5 Program Placement Targets**

Once the program is established (within the first 3 years of implementation of the Project), the City would initially target placing approximately 75 cats per year, utilizing support from non-profits, volunteers, and social media advertising (Facebook, NextDoor, etc.). The City would aim to increase the capacity for working cat placements through the program over time.

