

PUBLIC COMMENT OPPOSING ELIMINATION OF THE COMMISSION ON ANIMAL CONTROL AND WELFARE

Dear Members of the Commission Streamlining Task Force:

I write as a Professor of Law at the University of San Francisco School of Law, where I hold the Endowed Chair of the Justice for Animals Program and teach numerous courses in the field of animal law. I strongly oppose the Commission Streamlining Task Force's (Task Force) recommendation to eliminate the Commission on Animal Control and Welfare (CACW).

The Task Force's rationale fundamentally misunderstands CACW's distinct and necessary role in San Francisco's governance structure. Rather than being duplicative of Animal Care and Control (ACC), CACW serves a complementary function that ACC cannot and does not fulfill, despite ACC's important role in animal care.

CACW's Unique Role in Comprehensive Animal Welfare Policy

ACC is a municipal department properly focused on animal control services—primarily animal sheltering, licensing, and enforcement. CACW, by contrast, serves as the city's only dedicated body for broad animal welfare policy across all contexts and species. The staff's own examples illustrate this point: CACW's recent work on climate action, horseback riding policy in Golden Gate Park, live animal markets, and the San Francisco Zoo demonstrates precisely the kind of cross-departmental, policy-level work that no single city department addresses.

The claim that CACW has “morphed from an advisory body to an advocacy group” reflects a misunderstanding of what effective advisory commissions do. All San Francisco commissions “advocate” for appropriate policy changes within their areas of expertise—this is precisely what we expect them to do. CACW advocates for evidence-based animal welfare policies across city government, a function that remains essential. For example, CACW recently solicited input from experts on wildlife management policy and humane pest control to create a recommendation to city officials to ban the sale and use of glue traps in San Francisco. It spent months soliciting information from wildlife rescuers, animal advocates, and animal law and policy experts (myself included) to craft a thoughtful and persuasive recommendation to the Mayor and the Board.

CACW Does Not Duplicate ACC's Work

CACW has the statutory powers and duties granted to it by Section 41.2 and 41.3 of the San Francisco Health Code. Those include “hold[ing] hearings and submit[ting] recommendations regarding animal control and welfare to the Board of Supervisors and the City Administrator” and “study[ing] and recommend[ing] requirements for the maintenance of animals in public, private, and commercial care.” These powers and duties include broad questions of policy implementation and reform that distinguish CACW from ACC, whose primary role is to provide animal control services, operate the city's shelter, and enforce animal cruelty laws. As an expert in animal law, I can assure the Task Force that animal welfare issues, including those related to law and policy, go far beyond animal control, animal sheltering, and criminal law enforcement, as evidenced by CACW's work on the San Francisco Zoo, live animal markets, glue traps, and climate policy. These recommendations fit CACW's mandate to study policy issues related to animal welfare and the care of animals in public, private, and commercial settings.

While ACC does a tremendous job of providing animal control services, running the shelter, and enforcing the cruelty laws, those functions are not the same thing as advising city government on the broader issues that arise in animal law and policy, including those that arise in the context of farmed animals, food procurement policy, pest management, animal captivity and exhibition, and so on.

The Continued Need for Independent Oversight

The staff argues that “City staff can and do perform the necessary functions of the Commission without needing an advisory body.” This reasoning could justify eliminating virtually every advisory commission. The value of CACW lies precisely in providing independent, public-facing expertise that is *not* embedded within departmental operations. Advisory commissions exist to bring community perspective, specialized knowledge, and independent judgment to policy questions—not to rubber-stamp staff recommendations.

The dismissive characterization of public comment from “the same 1-5 people each meeting” reflects a troubling view of civic engagement. Consistent public participation by knowledgeable community members is a feature, not a flaw, of commission work. These individuals often possess specialized expertise in animal welfare, veterinary medicine, or advocacy that enriches policymaking.

San Francisco’s Leadership Role

San Francisco has historically led on animal welfare policy, from its early adoption of progressive shelter standards to its recent work on wildlife protection and farmed animal welfare. CACW has been instrumental in maintaining this leadership. Eliminating it would signal a retreat from the city’s commitment to comprehensive, evidence-based animal protection policy at precisely the moment when issues like climate change’s impacts on animals, urban wildlife conflicts, and evolving scientific understanding of animal sentience demand more sophisticated policy responses, not less. Animals are unable to make their voices heard in city politics; the Task Force’s recommendation would remove one of the few forums in which their perspectives are heard in policy-making.

Finally, I take issue with the Task Force’s finding that CACW is “narrowly focused . . . on a narrow topic.” Animal welfare is an issue that affects *tens of thousands* of animals who live in San Francisco, not to mention the humans who care about them. Animal welfare also intersects with countless other important social, environmental, and governance issues, from climate policy to food systems to urban wildlife. CACW’s broad mandate and cross-departmental perspective are more valuable than ever.

Conclusion

CACW costs the city minimal resources while providing substantial policy value across multiple departments and issue areas. Its scope is broader than ACC’s operational focus. Rather than eliminate this body, the Commission should recognize CACW’s distinct role in San Francisco’s animal welfare infrastructure and ensure it has the support needed to continue its important work.

I urge the Task Force to change its recommendation and support the continuation of CACW and its important work.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M. Liebman', with a long, sweeping horizontal stroke extending to the right.

Professor Matthew Liebman
University of San Francisco School of Law
Endowed Chair, Justice for Animals Program