

Shelter Reform Action Committee response to the 1998 Humane Society of the United States evaluation of the Center for Animal Care and Control

HSUS's credibility in preparing this report is both troubling and questionable. HSUS has been most cavalier about how it approached a supposedly impartial evaluation of the country's largest animal shelter system. While SRAC agrees with most of the HSUS' report of the deficiencies in CACC's structure and operations, and with its recommendations to correct such problems, there is a disturbing tone to this report that we feel undercuts its immediate impact to actually change things at the CACC. It is a document that is both hypercritical and apologetic, in a way that leaves the reader either perplexed or angry, depending on how informed the reader is on the animal issues.

The first aspect of the 173-page HSUS Evaluation Team Report ("Report") that one notes is its anonymity. No authors are credited. Indeed, not even the evaluation, or so-called "E-Team," members (those who made the site visits to CACC) are even identified. At this point, we have learned that HSUS Vice President of Companion Animals, Martha Armstrong, was the senior editor and that her Director of Animal Sheltering Issues, Sally Fekety, also contributed to the Report. It was only after SRAC requested the names and biographies of the HSUS Evaluation Team that they were provided. SRAC argues that at least one member of the E-Team should have been from New York City in order to add a local perspective to the political dynamic in which CACC operates -- one was not, and we find this troubling. SRAC asked Ms. Armstrong if HSUS president Paul Irwin had reviewed the report before it was issued, and she replied that he had not.

HSUS appears to consider itself to be the leading animal advocacy organization. HSUS would want us not to question its politics, philosophy and expertise. Unfortunately, HSUS, and its Companion Animal division, do come to the table with some baggage. And one can reasonably surmise that this baggage may color the lenses through which it perceives many issues. Its support of euthanasia to manage animal "control" has angered many animal advocates. It also suggests that HSUS endorses playing god with animals lives -- a philosophy with which SRAC strongly disagrees.

HSUS also appears to summarily dismiss animal welfare advocates who may hold views different than those of HSUS. For example, before the CACC evaluation was even released, HSUS' Martha Armstrong issued a highly inflammatory press release in response to an October 1998 New York Magazine cover story in which CACC did not fare well. Her press release, verging on the ad hominem, labelled local animal advocates who are critical of the CACC as "uninformed." Such name calling serves no purpose. It also ignores that HSUS admittedly relied on SRAC's extensive website as a source. It is this unfounded and sometimes mean-spirited criticism of animal welfare advocates, coupled with an almost apologetic embrace of the CACC, that is most troubling. The depths to which HSUS stooped in such media bashing demonstrates the bias with which it approached such evaluation.

HSUS has also simply disregarded the confidentiality with which it was given information regarding the case. For example, Gary Kaskel, Marie Mar, Julie Van Ness and Barbara Stagno of SRAC met with two of the six E-Team members, Kathy Savesky and John Snyder, on June 15, 1998. SRAC was given exactly two hours. Within a few days after such meeting, SRAC heard that CACC's executive director, Marilyn Haggerty-Blohm, was "surprised" that she was being "badmouthed" by

animal activists. This, a breach of the confidentiality with which we approached such meeting, further indicates a bias by HSUS which is unprofessional and inappropriate.

For some unexplained reason, HSUS appears to absolve Marilyn Haggerty-Blohm, the former City bureaucrat who is now CACC's executive director, from any responsibility for virtually any of CACC's deficiencies. The HSUS report spends a great deal of its content criticizing CACC's "lack of vision" and inadequate management, operations and procedures. Among those CACC deficiencies, HSUS identifies:

"The CACC was formed in haste..."

"Since its inception, CACC has lacked clear definition and direction and has experienced many obstacles associated with the frantic transition [from the ASPCA]."

"...CACC seems to be caught between having too many leaders at one moment and not enough at another."

"...staff that is doing one job several different ways with little conception of why. In the meantime, certain higher levels are operating under the assumption that orders are being carried out properly and without confusion.

This seems to be viewed as a normal result of the daily chaos..."

"...the organization still lacks a clear, complete and organizationally accepted understanding of who it is and what role it is--or should be--playing within the community."

"Field services provided on the extremely limited schedule of 8 AM to 8 PM, Monday through Friday, and with below minimum staffing level..."

"No programs to promote licensing/identification, leash laws, rabies prevention and/or keeping pets safe...and controlling the surplus pet problem."

"Transfer-laden stray holding programs that make it difficult for an owner to determine where his/her lost pet may be, and cumbersome paper-based lost & found program..."

"...owners of lost pets have no central clearing house to begin their search, and there is no method for oversight of stray holding or owners accountability at the various [other non-CACC] private facilities."

"Management staff appeared to be unaware of the potential that a successful identification and return-to-owner effort has for reducing shelter housing needs."

"There also appeared to be a lack of recognition for the substantive impact that a high return-to-owner rate can have on reducing euthanasia..."

"Key management staff members who lack working knowledge of animal control ordinances..."

"The existing priorities of improving facilities and expanding adoptions--much less the director's more long range plans--have not been articulated in a written plan, and are neither fully understood nor embraced throughout the organization."

"Newly hired adoptions staff members find themselves in conflict with other departments over their roles and responsibilities."

"...we were unable to obtain any comprehensive written documents that outlined what was planned

for the [multi-million dollar renovation of] buildings or the expanded operations that will take place within them."

"This lack of vision consistent with CACC's animal control mandate, as well as the absence of a written plan that details what they are trying to accomplish, have left staff confused as to where to focus their energies."

"...decisions concerning acquisitions and spending of new funds appear arbitrary and disconnected."

"...a gap [exists] between plans, decisions or ideas of the Executive Director or senior management and their implementation at the operational level..."

"...city officials established a corporate structure for CACC that gave total control to the Mayor's office and his designees."

"...the risks and downsides of the arrangement [of CACC's corporate structure] are reason for major concerns."

Questions have been raised as to the legality of this relationship...at best, confusing to the public and at worst, fraught with accountability issues and identity problems."

"The appearance of being a city agency and the lack of independence as a non-profit negatively impact fundraising from private sources..."

Current board [of directors] appointees reportedly function in a figurehead role rather than become actively involved in governance, fundraising, etc. This leaves the organization almost exclusively in the hands of the Executive Director..."

"...CACC's infrastructure is the proverbial house built on sand...with rotting timbers."

"The organization has no: (1) written safety plan; (2) no up-to-date- job descriptions; (3) a confusing organizational flow chart; (4) no structured training program; (5) no structured performance management system (with the exception of a yearly check-off style performance review for union employees); (6) no structured compensation system; (7) no operational planning, objective setting process or written standards that establish accountability for departments or managers."

"...developing new systems, policies, procedures and documentation for an organization that is already operating at full steam with only minimum administrative staffing is a daunting task, and not much has been accomplished to date."

"...institution-wide communication...reportedly breaks down often, leaving the organization vulnerable to more than its fair share of mistakes and oversights."

"...in an organization like CACC...the lack of an effective infrastructure [is] an invitation for disaster (or at minimum a lawsuit)"

"CACC's lack of an effective infrastructure has already resulted in considerable damage to its reputation, if not caused animals to be euthanized unnecessarily..."

"...no systematic approach to performance management is in place."

"With only a few exceptions, both management and line salaries at CACC fall below (or in some cases substantially below) the national averages for comparable positions within the animal protection field..."

"...staff as a whole do not appear to see their roles as educators informing then public. ...The organization lacks a customer-friendly educational approach to interactions with the public."
"CACC's relationships with other non-governmental agencies, particularly animal protection groups, represents one of its greatest weaknesses."

"Overstatement in CACC's publications, referring to the struggling agency as a 'model' or 'nationally recognized' or with 'revolutionary new programs' has simply further damaged credibility among agencies that are aware of both the organization's programs and what is being done in the field nationwide."

"The CACC's animal shelters...are in less than ideal locations. Some are quite difficult for both the public and staff to access from public transportation routes or main thoroughfares, and none are in an area considered inviting..."

"The lack of external signage further diminishes the likelihood of traffic to the shelter[s]."
"Many [internal] directional signs were present throughout CACC facilities, but in some cases, signs were missing and in others identification signs were posted incorrectly. E-Team members were concerned to be told that signage for staff was 'not an issue' in areas where the public did not have access."

"With a few exceptions, The CACC's hours of operations (including adoption and redemption) are inadequate for the average working individual or family. ... By not being open during expanded hours, a large population of the city is prohibited from receiving much-needed services."

"The CACC has spent a great deal of money to very inadequately utilize its current computer capabilities. As with some other CACC projects, it appears that computers have been...undertaken without a master plan, strong management support, or enough staff training."

"...there was significant confusion as to which individual was responsible for providing us with statistics. In the end, those that were requested were not received, and those we were given were incomplete and/or out of context."

"At the Brooklyn shelter, the daily animal count is penciled onto a crowded log sheet, and the tally sheet for the day of our visit was full of erasure marks and scribbles. Legibility aside, this system warrants concern."

"It became clear, with perhaps one exception, that statistics were not a current priority with the shelter managerial staff."

"To hear "I don't know" as an answer to a statistical question is not only unimpressive, but also implies indifference."

"We have concerns over the confusion generated by inconsistent intake documentation and procedures, especially in light of the sheer numbers of animals handled and day-to-day shelter transfers."

"HSUS E-Team members were told that animals who do not appear sick or injured could wait up to 24 hours before a thorough examination was possible."

"...HSUS E-Team members noted that the cage cards [designating adoption or euthanasia] themselves were not well protected. In many instances cards were soaking wet, chewed up, falling out of card holders, or simply missing altogether."

"Dog and cat housing at the Manhattan and Brooklyn shelters are antiquated, overcrowded and in very poor condition."

"...the top of a kennel is too low for some dogs to stand and move about freely. The cages are old and worn out with peeling laminate and separation of floors from the walls allowing water and urine to drip from one cage into the one below. In some areas, cages with a 'lifetime guarantee' are literally falling apart at the seams."

"Essentially the cages themselves are just too small."

"Ventilation was very poor at the Brooklyn and Manhattan shelters."

"...evidence of flies and rodents leave room for speculation as to how well food storage areas are maintained."

"One of the most noticeable problems associated with cleaning was the dampness of cages and sometimes of the animals in them."

"There are currently no established provisions or protocols for routine socialization at CACC facilities, even for long term holding animals. In addition, there are no adequate facilities (aside from at Manhattan) for the exercise of impounded animals...some dogs live in 3'x4' cages for months at a time (during holding) with limited exercise based on staff availability."

"There are [sic] a limited amount of basic drugs and supplies available in the examination and treatment areas of the Manhattan and Brooklyn shelters... There is very little in the way of resuscitation equipment... The type and quality of supplies we saw (antibiotics, etc.) were adequate, but there seems to be limited time to actually use them."

"...there are currently no staff trained and knowledgeable in wild animal behavior and/or rehabilitation. In addition, we were not made aware of any organized program for training of staff in wildlife handling, physical examination, common diseases, triage, rehabilitation issues and sick/injured animal treatment."

"...there were no special protocols for identifying [wildlife] species, selecting appropriate caging, giving fluids to correct dehydration, or methods for selecting and feeding appropriate diets."

"The euthanasia room in the Manhattan shelter appears quite noisy and full of boisterous activity."

"...In addition, loud announcements over the intercom seemed to cause stress to cats waiting euthanasia."

"...we were not convinced that there was enough education regarding the social, ethical, psychological and medical aspects of the euthanasia process."

"...the current adoption program is inadequate...more staff are necessary to handle the volume of adoptions the CACC is pushing for and is pushed for."

"...at the time of our visit, the CACC volunteer program had been suspended, pending review and restructuring."

Reports of the program prior to its suspension indicated that many of the volunteers were dissatisfied with either their roles, the limitations on their authority or policies and procedures of the organization."

"Serving a population of 7.3 million, the CACC has eight employees actually in the field answering any and all requests for service. The national average recommended by the National Animal Control Association is one officer per 16,000 to 18,000 persons. At CACC, there is one officer (rescue driver) per approximately one million persons."

"...CACC is able to respond to only about half the number of requests for animal rescue, prioritized by type."

"Currently, newly hired CACC field staff are trained on the job with little or no formal or professional class room training. ...There are currently no training logs or records documenting the progress of the employee. ...Rarely are there training meetings which involve outside professionals coming to CACC to instruct field staff on pertinent issues."

Notwithstanding this, the Report then goes on, for reasons unknown to completely absolve the inexperienced Mrs. Blohm from responsibility for many of these defects over which she has direct control. Though she's run CACC for more than a year and a half, HSUS continually refers to Mrs. Blohm as being new to the job. It cannot be doubted that an experienced shelter manager would have cleaned up many of the HSUS-identified operations problems long ago. But Mrs. Blohm simply doesn't have the knowledge or experience to identify and repair such problems in an efficient way. Bright as she is, Ms. Blohm is learning on the job -- at the expense of shelter animals. Despite that Ms. Blohm has no prior experience running shelters, and is running a shelter that is full of problems and that killed more than 40,000 animals last year, HSUS throws Mrs. Blohm its full support. HSUS never suggests that the CACC board hire an experienced executive director, as it should have. (It must be noted, although it was not noted in the HSUS Report, that the CACC board did, in fact, try to hire an experienced shelter director, Ed Sayers, two years ago. But such appointment was blocked by City Hall, in favor of one of its own, who turned out to be the Mayor's Office of Operations staffer Mrs. Blohm.)

The question of Mrs. Blohm's background, experience and credibility is a crucial one, as HSUS has accepted many of her claims and assertions without question -- and despite her lack of experience. This is a fatal flaw of the report. SRAC informed HSUS that, for months prior to present position, Mrs. Blohm was "on loan" from the Mayor's Office of Operations to run CACC (following the resignation under fire of the previous director, Martin Kurtz, a career Health Department bureaucrat with no prior experience in shelter management, either). Mrs. Blohm was supposed to be taking care of CACC business full time. In fact, she told SRAC members face to face that she was at CACC full time, every day. But when SRAC received reports that this was far from true, under the Freedom of Information Act, SRAC requested Mrs. Blohm's appointment calendar for the prior three months. Begrudgingly, the Mayor's office finally produced the appointment calendar, which made clear that she had many daytime appointments for the Mayor's office that had nothing to do with the CACC. Mrs. Blohm had lied about the amount of time she was spending "on the job," and her own records established it. Just four days after SRAC received the calendar, the CACC board held a special meeting to appoint Mrs. Blohm permanent executive director. The CACC abandoned its search for an experienced shelter director.

What is problematic, given these facts, is that the HSUS Report simply embraces, without question, many of the assertions made by Ms. Blohm -- an individual without any prior shelter experience.

HSUS' report is riddled with false assertions and claims by Mrs. Blohm. For example, she claims to have persuaded the City to commit new moneys to infrastructure improvements. She simply ignores that such "new" money had, in fact, already been committed and set aside before Mrs. Blohm even arrived at CACC.

HSUS boldly asserts that "CACC has reportedly received celebrity endorsement and assistance with publicity from actors Bernadette Peters and Mary Tyler Moore." This misrepresents the facts. Ms. Moore met the Mayor at a party after reading of the parade of CACC horrors in New York Magazine and asked to meet with City Hall officials. After requesting a meeting, she and Ms. Peters late last year met with Mrs. Blohm and Deputy Mayor Bruce Teitelbaum, who has since left the Mayor's Office, and discussed ways for the CACC to improve the grim situation. No commitments or endorsements to CACC management have been made by these two celebrities, who have indicated they are still exploring the issues. The HSUS report hyperbolically touts it as such in an attempt to bolster the current management. In addition "The Executive Director also reports that a positive relationship has been developing with one of the network affiliate stations," is a self-serving unsubstantiated statement by Mrs. Blohm that also does not belong in this document.

HSUS appears to have allowed its report with unsubstantiated claims so that the CACC can now bring to City Hall an HSUS endorsement that does not comport with reality.

We strongly believe Mrs. Blohm's first allegiance is not to the welfare of NYC's shelter animals, but to the Giuliani Administration. She has yet been unable to ask City Hall to double or triple CACC's budget, because it is simply not this mayor's will to do so and she knows it. She therefore, cannot be the true advocate for animals she should be. She has also mismanaged the CACC labor force. She has failed to dismiss problem employees who have been the subject of numerous complaints by the public and co-workers alike, while at the same time firing several dedicated key employees who were potential whistleblowers. Ms. Blohm's primary concern does not appear to be improving NYC's shelter system. Like her mentor, Mayor Rudy Giuliani -- who is widely criticized for carefully controlling the flow of public information -- Mrs. Blohm sees her mission of avoiding damage control by avoiding the release of negative information about CACC's disastrous operations. And when CACC is confronted with their errors, the Mrs. Blohm's official CACC line is to simply deny it all.

HSUS was fully apprised of the problems with Mrs. Blohm. HSUS has reviewed SRAC's extensive website in which a wide variety of records pertaining to the CACC are documented. Whatever in-person impressions Mrs. Blohm made on HSUS certainly should have been taken with a grain of salt, given her actual record and her failure to improve a litany of CACC's problems in any meaningful way. But that is not the case. Instead of seeing a focus on the continuing existence of these problems, we see statements like "The HSUS places its full confidence in the newly appointed Executive Director of the CACC, Marilyn Haggerty-Blohm, who has already done much to greatly to improve public support for her agency." We don't see any evidence to support that statement. Public perception and mistrust of the CACC is probably worse than it has ever been. When our animals continue to suffer and die in NYC shelters, as they do, such statements merely serve to undermine real improvement.

It is sad that HSUS's primary focus was not the shelter animals. Rather, HSUS seems obsessed with CACC's image and how its management reacts to the public. HSUS, at times, appears to have more than subtle contempt for the very people to whom CACC is ultimately responsible. In the Executive Summary, for example, HSUS states, "In its brief, history, CACC has repeatedly tried to change or define fragments of its program solely in response to public criticism." In the General Recordkeeping/Statistics recommendations, HSUS states,

"...the CACC is under constant, intense scrutiny, and in many cases, statistics (especially those relating to euthanasia) will be used to frame a critic's debate," and "Across the nation, there is a widespread misunderstanding of the role(s) that animal care and control organizations play in the care and protection of a community's companion animals." Under Euthanasia, HSUS claims, "Public threats, accusations, and even personal attacks abound." Under Adoptions, HSUS states, "For some members of CACC management, increasing adoptions has become the answer has become the answer to decreasing euthanasia and therefore the intense criticism of the public."

Such statements serve both to undercut accountability to the public and to foster an arrogance that is unhealthy for a corporation -- public or private -- that is serving a public purpose. The CACC (and HSUS for that matter) must always remember that the CACC does not own the animals that come into its shelters. Rather, the CACC is merely the custodian of such animals for the public, including identified pet owners. HSUS seems to have lost sight of this central fact. In its Corporate Structure Section, while describing CACC as a "hybridized" organization (neither City agency nor private not-for-profit), it states, "The perception of the organization as a city agency has raised expectations that board meetings must be open and records subject to the Freedom of Information Laws. Although some forum for public accountability is valid even in a totally private not-for-profit organization, the nature of fully open meetings, particularly when there is a tone of hostility among members of the audience, is to suppress open discussion among volunteer board members who tend either to want to appease the audience or remain quiet in fear of personal attacks."

SRAC respectfully submits that this position is utterly lacking in merit. To begin, it is far beyond the competency of HSUS to comment upon the CACC's status as a city agency. Simply put, HSUS is not a judge. More fundamental, HSUS's suggestion that public access and free speech at board meetings would stifle productive debate is ludicrous. It runs in the face of the First Amendment and argues for less public scrutiny, rather than more. Such rhetoric by HSUS crystallizes a certain non-profit, bureaucratic mentality that has helped to diminish the integrity of so many charitable organizations who grew large and wealthy, and whose officers then make decisions out of self-preservation and not charity. CACC's board is a sham board that is populated by politically-appointed individuals who, for the most part, have other priorities than animal protection on their agenda. For example, what interest does the Sanitation Commissioner have in animal protection? To such official, dead shelter animals are just another carting operation. Board members from the animal welfare community -- with an animal welfare agenda -- would not be swayed by the public gallery (a public that undoubtedly would be less hostile if they knew those board members were actually working in the best interests of animals).

In recommending that CACC revise its by-laws to clarify its corporate role, it states, "The HSUS recognizes that such a shift--to either a city agency with public accountability or a truly private agency with accountability through its board of directors--may not be possible on an overnight basis." HSUS ignores the fact that the CACC has had several years of "overnights" in which to make a change. Yet we see no change. Even if one were to ignore the passage of time and accept HSUS's statement, City Hall won't allow it to happen because it might subject itself to increased criticism for overt neglect. HSUS misses yet another point. The CACC will always be accountable to the public, so long as it accepts the municipal contract for animal care and control. No board of directors can circumvent the ultimate accountability to the public.

In the section Euthanasia, HSUS states, "It would be unrealistic to suggest that euthanasia could be stopped at CACC facilities." That statement is where HSUS most dramatically sells out the shelter animals of New York City. HSUS never cites the examples of the successful programs that other cities that have dramatically reduced kill-rates. If HSUS literally means a zero kill policy is unrealistic, then perhaps it may be unrealistic to expect that today. But a shelter system that need only kill animals who are incurably ill or in untreatable pain is certainly an attainable goal if sufficient resources are put into it and there is a political will to succeed. Political will has to be there. HSUS' disparaging of so-called "no-kill shelter" proponents belies its own philosophical low road. Such a statement -- one appearing to favor a pro-kill policy -- surely must fly in the face of HSUS's charter to protect animals. It certainly undermines any attempts to reach that goal. Other cities have succeeded in dramatically reducing their euthanasia rates with long-term programs, such as San Francisco, Las Vegas and others. Why does HSUS fail to cite other model programs? Why does it fail to state that reducing kill rates should be a goal?

HSUS' section on CACC Volunteers is the one we find the most troubling. At the same time that HSUS admits that animals at the CACC are languishing in cages that are too small for them, they are recommending that CACC continue to suspend its volunteer program. Why? Because some past volunteers have been critical of the CACC. This suggestion is outrageous. The CACC needs volunteers.

Current CACC management has dismantled a fairly successful volunteer program and never restored it. What does this mean? This means that dogs are not getting walked. This means that many animals are lacking any daily contact with human beings. This means that cages are not being cleaned as often as needed.

It is difficult to understand how HSUS sees volunteers as a bad thing. Rather than recognizing the need for volunteers and the fact that volunteers may actually enhance the accountability of the CACC, HSUS again urges a plan that would stifle criticism. Past volunteers who were so distressed at gross mismanagement went to the press to expose CACC injustices, including gross neglect, spite killings and power games played by shelter managers. Now, CACC management fears that volunteers are merely potential whistleblowers, to either be tightly reeled in or eliminated altogether. HSUS seems to have gone along with that. Its windy descriptions of the "thorough protocols" and "great deal of guidance" required to maintain volunteers is simply not balanced with the immediate and dire need for volunteers to supplement an inadequate staff -- for the immediate benefit of the animals. HSUS takes "procedures," "supervision" and "structure" to new heights. How much training and supervision is involved in getting dogs walked? Or in cleaning litter boxes? Or in brushing an animal? Or in scratching its head? Or in taking out trash? Or in offering a friendly voice? HSUS should be thoroughly condemned for allowing animals to suffer due to their bureaucratic notion of controlling volunteers from doing unknown damage to the organization. HSUS needs to put a face on its philosophy and look into the eyes of the dog languishing in the CACC undersized cage having to urinate on itself.

In the Legislation recommendations, HSUS drops the ball on one issue and throws it through the window on another. For the past four years, there has been a proposed mandatory spay/neuter bill languishing in the New York City Council. The most recent version of this bill, Intro 456, also mandates a city-funded low-cost spay/neuter program to subsidize poor residents who can't afford to have their animals spayed or neutered. Incredibly, CACC opposes this bill (because it forces the Mayor to spend money). And HSUS's failure to endorse a spay/neuter law, or even mention this bill, is a glaring and morally bankrupt omission. Finally, the recommendation that NYC legislate a restriction on the number of pets its citizens can own is simply preposterous, unenforceable and likely unconstitutional. HSUS doesn't even give a number to guide legislators. Is three too few, four too many? Come on, HSUS, you've got to be kidding? This recommendation was clearly not thought out at all and should never have been included in the Report.

While we applaud HSUS for taking such a detailed look at CACC's operation, above and beyond the call of the \$5,600 it was paid by CACC, we must denounce the overt failure to criticize the current management for its inexperience and lack of integrity. CACC is still rife with problems of their own doing. As recently as this writing, SRAC is receiving complaints from animal owners mistreated by CACC staff and horror stories of their pets being prematurely or mistakenly killed before they had a chance to claim them. HSUS Companion Animal division is clearly out of step with the ideals of true animal protection because it is playing politics with the quality of life, and very life itself, of the shelter animal. To resign that euthanasia is simply a fact of life that we must accept is a grotesque betrayal of animal protection ideals. HSUS clearly needs to allay some of its disdain for grass-roots animal advocates, who are, in theory, working toward the same goals. Because this report is such a mixed bag of analysis and philosophy, we can only hope that it does more good than harm.

