

AVMA



American Veterinary Medical Association

1931 N. Meacham Rd.  
Suite 100  
Schaumburg, IL  
60173-4360  
  
phone 847.925.8070  
800.248.2862  
fax 847.925.1329  
  
[www.avma.org](http://www.avma.org)

May 6, 2008

Office of Chief Counsel  
Federal Emergency Management Agency  
Room 835, 500 C Street, SW  
Washington, DC 20472

Re: Docket ID FEMA-2007-0008

Dear Madam/Sir:

I am writing on behalf of the American Veterinary Medical Association (AVMA), established in 1863 and the largest veterinary medical association in the world. As a not-for-profit association established to advance the science and art of veterinary medicine, AVMA is the recognized national voice for the veterinary profession. The association's more than 76,000 members comprise approximately 86% of U.S. veterinarians.

The AVMA commends FEMA for its creation of the National Advisory Council and its dedication to working towards a comprehensive approach to emergency preparedness and response.

As the National Advisory Council was instituted to ensure effective and ongoing coordination of the federal preparedness, protection, response, recovery, and mitigation of national disasters, acts of terrorism, and other man-made disasters, the AVMA would like to inform the NAC of concerns regarding current gaps in implementation of the PETS Act. Specifically, the AVMA urges the appropriate Federal agencies (DHS and FEMA) and Congress to revisit the National Response Framework, the Pet Evacuation and Transportation Standards (PETS) Act of 2006, and the Post-Katrina Emergency Reform Act (PKEMRA), in order to ensure comprehensive coordination of command and control for implementation of the PETS Act of 2006. This is necessary to resolve significant gaps for effective implementation at all levels of government.

The AVMA also contends that while the National Response Framework exemplifies an ever stronger emergency preparedness system for the United States, it is not comprehensive. In particular, the AVMA asserts that the FEMA National Integration Center should ensure the development of an Animal Annex within the National Response Framework to address all species-all hazards issues. Currently, questions exist regarding the federal agency that would lead on disaster issues associated with companion animals. A clear, comprehensive plan must be implemented to address animal issues in emergencies; as such issues truly affect the public health.

We compliment FEMA for its efforts in striving to develop close coordination on all aspects of preparedness and emergency management, however; all-species/all-hazards preparedness plans must be in place for the United States to be comprehensively prepared for disasters and emergencies.

Please feel free to contact Dr. Heather Case at (800-248-2862 ext. 6632 or [hcase@avma.org](mailto:hcase@avma.org)) should you need any additional information or explanation of AVMA's comments.

Respectfully,

Lyle Vogel, DVM, MPH  
Assistant Executive Vice President  
American Veterinary Medical Association