County of Fairfax, Virginia Planning Commission Meeting December 6, 2018 Verbatim Excerpt

Zoning Ordinance Amendment ARTICLES 2 AND 20 COMMONLY ACCEPTED PETS — An amendment to Chapter 112 (the Zoning Ordinance) of the 1976 Code of the County of Fairfax, as follows: revise the definition of Commonly Accepted Pets, as set forth in Part 3 of Article 20, by adding hedgehogs, chinchillas, and hermit crabs to the list of commonly accepted pets; by revising Section 2-512 to include all domestic fowl two months in age in the maximum number permitted on a lot; and by replacing the incorrect term "non-poisonous" with "not venomous to people," with respect to spiders and snakes. (Countywide)

Decision Only During Commission Matters (Public Hearing on November 29, 2018)

Commissioner Cortina: Thank you, Mr. Chairman. I would like to thank the residents and county staff who came to testify at the public hearing on November 29th, 2018, during – including the Director of the Animal Shelter, Carol Diviney – Karen Diviney, I'm sorry. And, I'd also like to thank Casey Judge in the Department of Planning and Zoning for her work on this amendment. There are divergent views in our community on this amendment, particularly adding the African Pygmy Hedgehog to the list of commonly accepted pets in Fairfax County. A concern was voiced that allowing hedgehogs would support exotic species as pets, particularly ones that are fads and that most people are not prepared to give them the special care, environment, and handling that they need, resulting in cruelty and/or abandonment at the county animal shelter. Cited also is the position of the US Humane Society against wild or exotic pets and the risk of zoonotic infectious diseases, that spread from animals to humans, especially salmonella. On the other side of this issue are residents who testified and wrote letters in favor of the – the amendment. Their argument is that all animals require care, and quoting one resident, "if a responsible pet owner can provide the necessary attention and lifestyle it needs to be healthy and well-cared for, that person should be able to keep a hedgehog." Planning and Zoning staff also support this amendment. Hedgehogs have not been imported into the country for several decades and USDAlicensed breeders would be the primary source, if not exclusive source, for county residents to purchase hedgehogs rather than pet stores. This would likely dampen the impulse purchases. Hedgehogs cannot survive in our climate so they're not a threat to the environment or native species. The Health Department has no special objection as the potential for disease is not higher than for other commonly accepted pets currently allowed in Fairfax County Code, such as turtles and other reptiles, and they advise hand-washing after handling pets. Staff also found that Arlington and Loudoun counties, which allow hedgehogs, do not have a problem with abandonment at their shelters. As a compromise position, it was suggested the Planning Commission consider a special permit for the hedgehog. However, Planning and Zoning staff is opposed to such a measure as the pet ownership of a hedgehog is not a land use matter and planning staff are not animal care experts. Along with the \$465 fee, and the time of both staff and residents to go through the process, I agree with staff's position. I understand the concerns raised by the Animal Services Commission, the Animal Shelter, and the US Humane Society with regard to expanding the allowable pet list to include wild or exotic species. However, I find from the testimony from residents and support the staff's position to advance this amendment to the Board of Supervisors. Therefore, Mr. Chairman, I MOVE THE PLANNING COMMISSION RECOMMEND TO THE BOARD OF SUPERVISORS ADOPTION OF THE PROPOSED ZONING ORDINANCE AMENDMENT REGARDING COMMONLY ACCEPTED PETS.

Commissioner Sargeant: Second.

Chairman Murphy: Seconded by Mr. Sargeant. Is there a discussion of the motion?

Commissioner Sargeant: Mr. Niedzielski-Eichner.

Chairman Murphy: Yes, Mr. – yes, Mr. Niedzielski-Eichner.

Commissioner Niedzielski-Eichner: Mr. Chairman, I'm – I will support this motion, but will do so only out of respect for the time and energy of the staff, particularly Ms. Judge, has put into the analysis of the proposed zoning ordinance amendment and report preparation. Also, I commend those who have advocated for this change or in opposition. You have offered thoughtful and well-researched information. I understand that the Board directed staff to undertake this study leading to this proposed amendment. What I don't understand is how adding hedgehogs, chinchillas, and hermit crabs to the list of commonly accepted pets could possibly rise to a priority level that is justified in relation to all the other land use matters that demands staff's professional attention. The staff who spent time on this minor need are in the middle of rewriting the county Zoning Ordinance, for heaven sakes. Call me a curmudgeon, but I support this motion with protest. Thank you, Mr. Chairman.

Chairman Murphy: Mr. Hart.

Commissioner Hart: Yeah, thank you, Mr. Chairman. I appreciate Commissioner Cortina's efforts and that – appreciate this was deferred. I also appreciate the efforts of staff on this. I – I can't support the amendment, as it's – as it's currently worded. The question for us is whether to add these animals to the list of commonly accepted pets. I think on the record before us, given the delicate and sensitive characteristics of hedgehogs, their – their sensitivity to a narrow temperature range, I would conclude that hedgehogs are still an exotic pet and I am persuaded by the input we had from the head of the animal shelter, the Animal Advisory Commission folks, strongly urging us to not do this. I certainly would have been willing to study further whether there is an option between the current toll prohibition on hedgehogs and making them by-right under all circumstances. I don't know if that's feasible or not, but I – I certainly would have been open to that. Because hedgehogs, I think, are something that we would defer to – or I ordinary would defer to professionals or people that knew more about it than I did. I think the head of the animal shelter and the animal advisory folks persuaded me. I won't be able to support this, as worded. Thank you.

Chairman Murphy: Mr. Ulfelder.

Commissioner Ulfelder: Thank you, Mr. Chairman. I'm sure many of you knew – know of Beatrix Potter, the British children's book writer who is best known, I think, for her turn of the last century book, "The Tale of Peter Rabbit," which I suspect many of you read or have read to you or read to your children. What you may not know is that several years after she published that book, she published a book called, "The Tale of Mrs. Tiggy-Winkle," and Mrs. Tiggy-Winkle was the name of her pet hedgehog. And she not only was a wonderful children's book writer, but she was a naturalist and an environmentalist, and did many things for the English countryside besides write books about – children's books about pets. That was 75 years ago. And

I think we should be allowing people, if they can – if they have the ability to have hedgehogs as pets. When I looked at this, I looked that there were four things for me. One, was public safety. Hedgehogs don't bite. They might nip, but they don't pose a danger that a lion, or tiger, or black mamba does. There's a question of the public health. I think that's been answered. Yes, there are risks of salmonella, but they're small and compared to the similar risks for other – certain other pets that we allow, turtles and so on, and salamanders. There is no direct impact on the environment. If they get out, they aren't going to survive through the winter around here. And I don't expect we would walk out the door and see them roaming across the streets of Fairfax County. The one area, and I think it's the area that Commissioner Hart has focused on, is the one area probably of the most concern, which is animal welfare. It's true that these animals are a little bit difficult to take care of, but the instructions are clear and the people who provide these pets to willing owners do a lot of work to teach them about how to care for them and how to protect them. And I think that for people who are up for that, they can be very nice pets. And I don't think – for that reason, I think I'm gonna support the original motion including hedgehogs as it – accepted that's here in Fairfax County.

Chairman Murphy: Thank you, Ms. Strandlie.

Commissioner Strandlie: Thank you, Mr. Chairman. I concur with Commissioner Niedzielski-Eichner about the process that got us here and the prioritization. I would feel much more comfortable if it were the animal control professionals and vets who are coming to ask – asking us to adopt this, but it's not. I also agree and think we should get most of our information from the professionals. One of the main character – one of the main statements of the hearing last week was whether or not there was veterinary care available here. And I called my vet on the way over and we had a discussion. And the recommendation was we don't have the ability to care for them. We don't. And the recommendation was to not – to vote no. We've – I also heard from constituents in our district who are part of the Animal Advisory Network. So, I will be voting no pertaining to hedgehog. I would support the chinchilla and the hermit crab. And perhaps we can come to some accommodation that will see this through or maybe a continual deferral. I would actually be interested to see if the additional correspondence and information that came in persuaded the experts – who testified against this last week – to see if they had changed their – their position. But we don't have time for that, at this point. So, I would support an amendment, but I would vote no on the overall proposal that's crafted.

Chairman Murphy: Alright. Ms. Hurley.

Commissioner Hurley: I will be supporting the amendment and I wish to align myself a hundred percent with Commissioner Ulfelder. I don't always do that. Although I also agree. This does seem to be an awful lot of bureaucracy for a little hedgehog.

Chairman Murphy: Is there further discussion of the motion? All those in favor of the motion to recommend to the Board of Supervisors the adoption of proposed Zoning Ordinance Amendment regarding Commonly Accepted Pets, say aye.

Commissioners: Aye.

Chairman Murphy: Opposed?

Commissioners: Nay.

Chairman Murphy: Motion carries. Ms. Strandlie, Mr. Hart, and Mr. Carter vote no. I was on the fence, but after Mr. Ulfelder's bedtime story analogy – I mean, there was only one way to go as far as I was concerned. But for those who have never seen the Planning Commission on television or in person, you never will be surprised at what we are going to discuss.

Commissioner Cortina: Mr. Chairman?

Chairman Murphy: Okay.

Commissioner Cortina: I ALSO MOVE THAT THE PLANNING COMMISSION RECOMMEND THAT THE AMENDMENT BECOME EFFECTIVE AT 12:01 A.M., THE DAY FOLLOWING ADOPTION.

Commissioner Sargeant: Second.

Chairman Murphy: Seconded by Mr. Sargeant. Is there a discussion of that motion? All those in favor of the motion, say aye.

Commissioners: Aye.

Chairman Murphy: Opposed? Motion carries. Same no? Ms. Strandlie, no. Mr. Hart, no. Mr. Carter?

Commissioner Carter: Yes.

Chairman Murphy: Yes, okay.

Commissioner Cortina: Furthermore, I have two follow-on motions.

Chairman Murphy: Please.

Commissioner Cortina: As a follow-on motion, if the amendment is ultimately adopted by the Board of Supervisors, I MOVE THAT THE PLANNING COMMISSION RECOMMEND THE OFFICE OF PUBLIC AFFAIRS INCLUDE A STATEMENT ENCOURAGING PEOPLE TO LEARN MORE ABOUT THE CARE REQUIREMENTS AND SAFE HANDLING IN THE PRESS RELEASE ANNOUNCING THE ADOPTION OF THE AMENDMENT.

Commissioner Sargeant: Second.

Chairman Murphy: Seconded by Mr. Sargeant. Discussion of that motion? All those in favor of that motion, say aye.

Commissioners: Aye.

Chairman Murphy: Opposed? Motion carries. Is everybody – support that motion? Times up.

Commissioners: Yes.

Chairman Murphy: Okay, motion carries unanimously.

Commissioner Cortina: And I – I FURTHER MOVE, finally, THAT THE PLANNING COMMISSION RECOMMEND ANIMAL CONTROL PROVIDE AN UPDATE, EITHER IN THEIR ANNUAL REPORT OR OTHER COMMUNICATION, ON THE NUMBERS OF THESE TYPES OF ANIMALS RECEIVED BY THE FAIRFAX COUNTY ANIMAL SHELTER WITHIN ONE YEAR OF ADOPTION OF THE AMENDMENT.

Commissioner Sargeant: Second.

Chairman Murphy: Seconded by Mr. Sargeant. Discussion? All those in favor of that motion, say aye.

Commissioners: Aye.

Chairman Murphy: Opposed? Motion carries unanimous.

The first motion carried by a vote of 6-3. Commissioners Carter, Hart, and Strandlie voted in opposition. Commissioners Clarke, Migliaccio, and Tanner were absent from the meeting.

The second motion carried by a vote of 7-2. Commissioners Hart and Strandlie voted in opposition. Commissioners Clarke, Migliaccio, and Tanner were absent from the meeting.

The third and fourth motions carried by a vote of 9-0. Commissioners Clarke, Migliaccio, and Tanner were absent from the meeting.

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STAFF REPORT

PROPOSED ZONING ORDINANCE AMENDMENT

Article 20 — Commonly Accepted Pets

PUBLIC HEARING DATES

Planning Commission November 29, 2018 at 7:30 p.m.

Board of Supervisors January 22, 2019 at 4:00 p.m.

PREPARED BY

ZONING ADMINISTRATION DIVISION DEPARTMENT OF PLANNING AND ZONING

703-324-1314

October 16, 2018

CVJ



Americans with Disabilities Act (ADA): Reasonable accommodation is available upon 7 days advance notice. For additional information on ADA call 703-324-1334 or TTY 711 (Virginia Relay Center).

STAFF COMMENT

The proposed amendment is on the 2018 Priority 1 Zoning Ordinance Amendment Work Program. The purpose of this amendment is to make modifications to the definition of "commonly accepted pets" found in Section 20-300 of the Fairfax County Zoning Ordinance. The modifications include the addition of several animals that have become more common as pets in recent years, as well as other changes intended to improve the clarity of the definition. This amendment to the Zoning Ordinance is concurrent with proposed changes to Chapter 41.1 of the Code of Fairfax County (the Code), Animal Control and Care, which seeks to revise and update the definition of "wild or exotic animal."

Background

The proposed amendment is in response to a request by the Board of Supervisors, directing staff to update both Chapter 41.1 of the Code and Article 20 of the Zoning Ordinance, to allow certain animals that have become increasingly commonplace in recent years within the pet trade as "commonly accepted pets." The current definition of commonly accepted pets was adopted by the Board of Supervisors on February 25, 1985 with the adoption of Zoning Ordinance Amendment ZO-85-117. As part of that amendment, a new definition for "commonly accepted pets" was established, which includes domesticated rabbits; hamsters, ferrets, gerbils; guinea pigs; pet mice and pet rats; turtles; fish; dogs; cats; domestic chickens, ducks and geese under two months old; birds such as canaries, parakeets, doves and parrots; worm/ant farms; non-poisonous spiders; chameleons and similar lizards; and non-poisonous snakes.

Under the existing provisions for the keeping of animals set forth in Section 2-512 of the Zoning Ordinance, commonly accepted pets are allowed as an accessory use on any lot, provided such pets are used for personal use and enjoyment and not for any commercial purpose. Except for dogs, there is no limitation on the number of commonly accepted pets which are permitted on a lot, provided that the keeping of such pets continues to be an accessory use to the principal use on the lot. The Board of Zoning Appeals (BZA) may approve a special permit to modify certain provisions relating to the keeping of animals, which includes allowing the ownership of an animal not identified as a commonly accepted pet, provided such animal is not considered wild or exotic as defined in Chapter 41.1 of the Code. Approval of a special permit is subject to those standards set forth in Section 8-917 of the Ordinance. In reviewing an application, the BZA considers the types and number of animals proposed to be kept, the characteristics thereof, the proposed management techniques, and the location at which such animals will be kept on the lot. The BZA may impose development conditions, including screening and additional setback requirements for associated structures, to ensure that there will be no adverse impact on adjacent property and no emission of odor or noise detrimental to other property in the area.

Staff has seen an increase in inquiries related to the keeping of animals such as hedgehogs, chinchillas, and hermit crabs, as these animals are popular and routinely sold as part of the retail pet trade. In discussions with local veterinarians, the care of chinchillas was said to be most similar to the care of domestic rabbits, and the care of hedgehogs most similar to the care of domestic ferrets. Hedgehogs in particular are known to be desirable for owners with allergies, who may otherwise be unable to own other fur-bearing commonly accepted pets. Given their relatively

low-maintenance care (as opposed to other pets such as dogs or cats), hedgehogs and chinchillas have risen in popularity among pet owners.

In addition to the rising interest observed by staff, the Board of Supervisors has also received public testimony from community members regarding the inclusion of hedgehogs, in particular, as commonly accepted pets. However, since none of these particular animals are included in the definition of commonly accepted pets, special permit approval is currently required. However, while the keeping of chinchillas and hermit crabs require Special Permit approval, hedgehogs are prohibited to be kept within the County, as they have been determined to be wild or exotic per Chapter 41.1 of the Code.



Figure 1: African Pygmy Hedgehog

In 2001, the Board considered proposed amendments to the Zoning Ordinance and Chapter 41 of the Code to permit domestically bred African pygmy hedgehogs and hermit crabs as "commonly accepted pets." While the Planning Commission unanimously recommended the adoption of this amendment, the Board voted to not adopt the proposed amendment based on concerns raised by what was then called the Fairfax County Animal Care and Control Advisory Committee. The Committee opined that both hedgehogs and hermit crabs were "wild animals," and, as such, their use as pets would be potentially inhumane. In addition, in 2015, research was conducted and a second draft amendment to the commonly accepted pets definition was prepared by staff. At that time, the now-called Animal Services Advisory Commission's voted to endorse the proposed amendment. However, the request for authorization to advertise a public hearing on the proposed amendment was removed from the Board's agenda.

Over the past ten years, the BZA has reviewed approximately 45 special permit applications for the modification to the limitations on the keeping of animals. Of these applications, only one application involved the keeping of a chinchilla, and no applications were processed for the keeping of hermit crabs. All but six of the special permit requests involved the keeping of dogs in excess of the number permitted on-site, or the keeping of chickens on lots less than two acres in size. In the case of animals such as hedgehogs, chinchillas, and hermit crabs, it is likely that most county residents are unaware of zoning and other county regulations concerning these pets.



Figure 2: Chinchilla

Proposed Amendment

The proposed Zoning Ordinance Amendment seeks to add certain animals to the definition of "commonly accepted pets," and make other minor editorial changes to existing regulations.

As proposed, hedgehogs, chinchillas, and hermit crabs would be added to the definition of commonly accepted pets and would therefore be permitted in Fairfax County without special permit approval by the BZA. This revised definition is in keeping with the proposed changes to Chapter 41.1 of the Code, which will explicitly exclude "hedgehogs" from the definition of a "wild or exotic animal." It has been a longstanding interpretation of animal control services that hermit crabs, as an invertebrate species, are not considered to be "animals" for the purposes of these regulations, and therefore are not specifically prohibited by Chapter 41.1. A



Figure 3: Hermit crab

copy of the proposed revisions to Chapter 41.1 of the Code will be provided in connection with a request to authorize advertisement of a public hearing on the amendments, which is expected on December 4, 2018.

The amendment also seeks to replace the term "non-poisonous" with "not venomous to people" in regards to spiders and snakes. This proposed change is made in consultation with animal experts and is consistent with the technical definitions of "poisonous" and "venomous." Venomous organisms deliver or inject venom into other organisms, using a specialized apparatus of some kind (usually fangs or a stinger), while poisonous organisms do not deliver their toxins directly. The entire body, or large parts of it, may contain the poisonous substance and may be harmful when eaten or touched.¹

Finally, the amendment also proposes to revise Section 2-512 of the Ordinance as it pertains to the age of fowl counted towards the maximum number permitted on a lot. Currently, only domestic fowl six months in age or older are counted towards the bird unit calculation. However, the current definition of "commonly accepted pet" permits domestic fowl under two months old. This change from six months or older to two months or older would ensure that the limitations in Section 2-512 are consistent with the age limitations in the commonly accepted pets definition. As a result, all domestic fowl two months in age or older would need to be kept on lots of two acres or more, or a special permit would be required.

Outreach

Staff has worked with multiple agencies and individual staff during the review of this amendment, including the Animal Services Division, representatives from the Animal Shelter, the County's wildlife biologist, and the Health Department. While there are no health concerns with the keeping of chinchillas or hermit crabs, staff representing these agencies raised concerns about hedgehogs and the potential spread of zoonotic diseases, which are infections shared between animals and people. An example of a zoonotic disease is salmonella, which is the primary concern related to

¹ Source: http://insects.about.com/od/insects101/f/venomous-or-poisonous.htm

hedgehogs and other pets deemed to be exotic. However, according to the Center for Disease Control and local exotic animal veterinarians, pet owners are equally likely to contract salmonella from any commonly accepted pet that consumes a plant-based diet. While approximately 30 people in the United States were reported to have contracted salmonella from 2011-2013 from the contact with hedgehogs, these numbers are significantly lower than the reported contraction rates from turtles, lizards, and chickens. Thorough hand-washing following contact with any animals and their habitats can prevent salmonella infection. From a communicable disease standpoint, the Health Department has no objections to the proposed amendment.

Representatives from the Animal Services Division, Animal Shelter, and the County's wildlife biologist also raised the concern of the increase in animal abandonment of hedgehogs and chinchillas, which would have an impact on the Fairfax County Animal Shelter and its resources. By allowing these animals, Animal Shelter and Animal Services staff worry that people will adopt them without knowing the time and monetary commitments needed to properly care for these animals, therefore resulting in the surrendering of the animals. However, this concern can be applied to any of the pets included in the "commonly accepted pet" definition. While staff cannot predict the potential abandonment statistics, staff did conduct outreach with other local jurisdictions within Northern Virginia to gain insight on their policies and experiences with the animals being proposed in this amendment. The following table summarizes where hedgehogs, chinchillas, and hermit crabs are and are not permitted:

Jurisdiction	Animal	Permitted?
Arlington	Hedgehog	Yes
	Chinchilla	Yes
		No specific
	Hermit Crab	language in Ordinance
Fairfax City	Hedgehog	No
	Chinchilla	No
	Hermit Crab	Unclear
Falls Church	Hedgehog	No
	Chinchilla	No
	Hermit Crab	No
Loudoun	Hedgehog	Yes
	Chinchilla	Yes
	Hermit Crab	Yes
Prince William	Hedgehog	No
	Chinchilla	Yes
	Hermit Crab	Yes

Arlington County most recently adopted a Wild and Exotic Animal Ordinance in September 2017. While Arlington County shelters periodically receives hedgehogs and chinchillas as surrenders, they have never received complaints for these animals "at large" or as strays. The chinchillas surrendered to the shelter are adopted out, and the hedgehogs are placed through a specialized

rescue group. Since the adoption of the Wild and Exotic Animal Ordinance, they have not seen an increase in surrendered hedgehogs or chinchillas. Since 2013, the shelter has received two surrendered hedgehogs. Loudoun County, which also permits hedgehogs and chinchillas, receives relatively few hedgehogs and chinchillas in their shelters, and those that are received are quickly adopted.

Staff also has been in contact with local exotic veterinarians to gain insight on the long-term care of hedgehogs and chinchillas. While care for these animals typically involves a recommended annual examination, some veterinarians are concerned that if these animals remain illegal to own, owners may be less likely to bring their animal into the veterinarian when care is needed, which leads to poor animal welfare. Many Fairfax County residents already own hedgehogs, and while many bring their animals into the veterinarians for care, other residents have been hesitant to bring them in or to provide contact information in fear of being reported to the County for owning an illegal animal. Because of these reasons, the veterinarians staff has been in contact with support this amendment.

On September 13, 2018, the amendment was presented to the Animal Services Advisory Commission. The Commission did not endorse the amendment. Commission members questioned whether enough data was available to fully evaluate the amendment, including whether there is enough public interest to justify it. Commission members also expressed concerns that the amendment could foster an exotic pet fad resulting in irresponsible care for these animals.

Conclusion

The changes proposed as a part of the Commonly Accepted Pets amendment would bring the definition of commonly accepted pets into accord with the proposed definition of wild or exotic animals found in Chapter. 41.1 of the Code, and it would permit county residents to keep these pets without the need of a special permit. Therefore, staff recommends approval of the proposed amendment with an effective date of 12:01 a.m. on the day following adoption.

PROPOSED AMENDMENT

This proposed Zoning Ordinance amendment is based on the Zoning Ordinance in effect as of October 16, 2018, and there may be other proposed amendments which may affect some of the numbering, order or text arrangement of the paragraphs or sections set forth in this amendment, as other amendments may be adopted prior to action on this amendment. In the case of such an event, any necessary renumbering or editorial revisions caused by the adoption of any Zoning Ordinance amendments by the Board of Supervisors prior to the date of adoption of this amendment will be administratively incorporated by the Clerk in the printed version of this amendment following Board adoption.

Amend Article 20, Ordinance Structure, Interpretations and Definitions, Part 3, Definitions, by revising the definitions as follows:

PETS, COMMONLY ACCEPTED: Any of the following animals that have been bred or raised to live in the habitation of humans, and are dependent upon the same for food and shelter: Domesticated rabbits; hedgehogs; chinchillas; hermit crabs; hamsters; ferrets; gerbils; guinea pigs; pet-mice; and pet rats; turtles; fish; dogs; cats; domestic chickens, ducks and geese under two (2) months old; birds such as canaries, parakeets, doves and parrots; worm/ant farms; non-poisonous spiders; chameleons and similar lizards; and non-poisonous spiders and snakes not venomous to people. The BZA may allow other pets animals to be kept as commonly accepted pets in accordance with the provisions of Part 9 of Article 8.

Amend Sect. 2-512, Limitations on the Keeping of Animals, Par. 3 as follows:

B. The number of domestic fowl kept on a given lot shall not exceed the ratio of one (1) bird unit per one (1) acre, with a bird unit identified as follows:

32 chickens = 1 bird unit 16 ducks = 1 bird unit 8 turkeys = 1 bird unit 8 geese = 1 bird unit

In determining the number of domestic fowl permitted, only fowl six (6) two months or older in age shall be counted.