

September 21, 2016

Dr. Robert Gibbens, DVM
Western Regional Director
USDA, APHIS, Animal Care
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Mail Stop #3W11
Fort Collins, CO 80526

Via e-mail: Robert.M.Gibbens@aphis.usda.gov

Dear Dr. Gibbens:

Please consider this to be a complaint on behalf of Friends of Woodland Park Zoo Elephants regarding Bamboo, a 49-year-old female Asian elephant held at the Oklahoma City Zoo (license # 73-C-0002) in Oklahoma City, Oklahoma.

Newly obtained records from the zoo from May 13, 2015 through August 13, 2016 show multiple incidents of aggression between Bamboo and the other elephants held at the zoo, indicating that the zoo appears to be in violation of the Animal Welfare Act and its accompanying regulations.

Specifically, records (see links below) show at least nine incidents of aggression toward Bamboo by the other elephants or by Bamboo toward other elephants, some resulting in injuries, from May 2015 through May 2016. Notable incidents are, as follows (please see a more detailed list, linked below):

- 12/31/15: Bamboo sustained a 9x3cm tail wound, suspected to be a bite wound by another elephant
- 2/5/16: Keepers reported a 5x4cm tail wound, similar to the location of the previous bite injury, referring to the wound as a bite from another elephant
- 3/7/16: An open wound was found at the tip of Bamboo's tail, exposing soft tissue and tendon, noted to be an amputation by another elephant
- 4/25/16: Records show that Chandra chased and pushed Bamboo, resulting in a 6" long 2" wide scrape on Bamboo's trunk
- 5/8/16: Keeper records show that Bamboo pushed Achara under a hotwire fence

Other conditions Bamboo suffered from that potentially arose from unobserved instances of aggression are noted in the records, though they cannot be stated to a certainty to be the result of aggressive behavior, specifically:

- 6/6/15: Edema (swelling) left central abdomen
- 10/29/15: Skin abrasion and 10cm fissure in skin on right hip
- 2/14/16: Swelling above right eye

Documentation of aggressive incidents among the elephants ceased abruptly after May 22, 2016. Given their frequency prior to that date, this raises the question of whether aggression in fact stopped or whether zoo staff simply discontinued noting it in their records. The latter explanation is more likely in light of the fact that from April through mid-August 2016, records show that Bamboo has been housed overnight in an enclosure separate from the other elephants *at least 46 times*. Why would they be separating her from the others if compatibility issues were not ongoing?

Friends of the Woodland Park Zoo Elephants contends that housing elephants who are demonstrating aggression together may violate the following regulations:

§ 3.133 - Separation.

Animals housed in the same primary enclosure must be compatible. Animals shall not be housed near animals that interfere with their health or cause them discomfort.

§ 2.131 - Handling of animals.

(a) All licensees who maintain wild or exotic animals must demonstrate adequate experience and knowledge of the species they maintain.

(b)(1) Handling of all animals shall be done as expeditiously and carefully as possible in a manner that does not cause trauma, overheating, excessive cooling, behavioral stress, physical harm, or unnecessary discomfort.

(d)(1) Animals shall be exhibited only for periods of time and under conditions consistent with their good health and well-being.

§ 2.40 - Attending veterinarian and adequate veterinary care (dealers and exhibitors).

(b) Each dealer or exhibitor shall establish and maintain programs of adequate veterinary care that include:

(2) The use of appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and the availability of emergency, weekend, and holiday care;

Note that the zoo was well aware of potential integration issues with Bamboo who had already demonstrated compatibility problems in two prior zoos. At Woodland Park Zoo, Bamboo was consistently separated from the elephant, Watoto, due to compatibility issues. And, in a 2005 press release addressing Bamboo's relocation to Tacoma's Point Defiance Zoo, the Woodland Park Zoo stated: "Bamboo occasionally has displayed aggressive behavior toward Hansa and does not appear to have the skills necessary to safely play a constructive role within a herd with young calves. Bamboo's unpredictable behavior poses a significant challenge to managing the four elephant elephants [at WPZ] as one integrated herd."¹ *Point Defiance was unable to integrate Bamboo and returned her to Seattle less than a year later.* Despite this known history, it does not appear that the Oklahoma City Zoo took any steps to ensure that Bamboo would integrate with the zoo's existing four elephants, and there is no evidence that she has integrated;

her relationship with the other elephants in the zoo appears to alternate between aggression and forced, physical separation.

Further, incompatibility issues at the zoo affects all the elephants. It has just been announced that Achara tests positive for the deadly EEHV virus, and Friends is especially concerned about the stress caused by aggressive incidents, as stress can cause the dormant virus to break out, putting Achara's life at risk.

We therefore urge APHIS to investigate this situation and to take immediate steps to ensure that these incompatible elephants are no longer housed in the same primary enclosure so they are no longer at risk of injury from one another. This investigation should include a review of the exhibitor's elephant management policies to determine whether appropriate steps are being taken to ensure the safety of each elephant being held, and that their social needs are being met.

Aggression between elephants in a space that does not allow for escape puts the elephants at serious risk for injury or death. Elephants in enclosed zoo exhibits have been killed in aggressive incidents—among others, in San Diego and on at least one occasion in Toronto. Therefore, if there is no way to reasonably ensure that Bamboo will not continue to be at risk of aggression from the other elephants or vice versa, we urge that Bamboo be confiscated and moved to a sanctuary that can offer her adequate space and appropriate companionship with other elephants.

Thank you for your prompt attention to this matter.

Sincerely,

Nicole Meyer

Medical and Keeper Records:

http://www.freewpzelephants.org/docs/73_tail_bite_1.pdf

http://www.freewpzelephants.org/docs/77_tail_bite2_tail_bite_3_amputation.pdf

http://www.freewpzelephants.org/docs/78_trunk_attack_med.pdf

http://www.freewpzelephants.org/docs/80_trunk_attack_keeper_Achara_attack.pdf

Summary of incidents:

https://drive.google.com/file/d/0B4OIfV7t92_LYkotRmhyTTNgZmc/view

ⁱ http://www.freewpzelephants.org/docs/WPZ_PR_Bamboo_agressive.pdf