

Maryland's Fatal Attractions

An Overview of Captive Wildlife Issues in Maryland



THE HUMANE SOCIETY
OF THE UNITED STATES

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Celebrating Animals | Confronting Cruelty

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Introduction

Maryland law generally prohibits the private possession of certain dangerous wild animals, including big cats, bears, and primates.¹ Unfortunately, the law currently has loopholes for certain federal permit-holders that allow many exotic pet owners and unqualified facilities to continue to keep these species. To protect the citizens of Maryland and promote wildlife conservation and animal welfare, The Humane Society of the United States will work to strengthen Maryland's existing law to restrict the possession of big cats, bears, and primates to qualified, professionally-run facilities, such as zoos accredited by the Association of Zoos and Aquariums and sanctuaries accredited by the Global Federation of Sanctuaries. As evidenced in this report, an exhibitor's license from the U.S. Department of Agriculture does not mean that the facility meets professional standards or adequately protects public safety and animal welfare, and should not be a basis for exempting facilities from Maryland law.

Wild and exotic animals have unique and complex needs and many animals in these facilities are long-lived. Providing decades of appropriate care requires substantial resources, including sufficient levels of professionally-trained staff, the funds to construct and maintain large, safe, and humane enclosures, steady income to pay for nutritious food and veterinary care, and the knowledge to execute proper husbandry and enrichment.

Some animals, such as tigers, lions, and bears, present obvious physical dangers to both keepers and the community. Primates also have the capacity to inflict serious physical harm and can spread viral, bacterial, fungal, and parasitic diseases that pose serious health risks to humans. These animals pose a danger not only to zookeepers, but to visitors, neighbors, and emergency responders such as firefighters, paramedics, and police. Indeed, the National Association of State Public Health Veterinarians recognizes the inherent dangers of these species and believes that "Direct contact with dangerous animals (e.g., nonhuman primates, certain carnivores...) should be completely prohibited."²

AZA-accredited zoos and bona fide wildlife sanctuaries spend considerable resources to provide animals with an enriched environment to alleviate profound boredom and psychological distress, but the same cannot be said of roadside zoos or individuals who cage these animals in backyards, garages, basements, and small, barren environments. In such cases, animals usually spend their lives—often decades—living on concrete or hard compacted dirt, and are denied the basic necessities of adequate food, shelter, veterinary care, and companionship. They typically develop an array of captivity-induced health problems and neurotic behaviors as a result of living in grossly sub-standard conditions.

To demonstrate the common failings of USDA-licensed facilities that are not accredited by AZA or GFAS, The HSUS arranged for two captive wildlife experts to visit and evaluate three of Maryland's roadside zoos—Catoclin Zoo in Thurmont, Plumpton Park Zoo in Rising Sun, and Tri-State Zoo in Cumberland. All three roadside zoos keep animals in conditions that were common 30 or 40 years ago, but which are totally inconsistent with modern husbandry practices.* Catoclin Zoo, Plumpton Park Zoo, and Tri-State Zoo were selected for site visits because these facilities have not only been the source of many complaints to The HSUS from members of the public, but also are the only non-AZA accredited facilities in Maryland housing all three species of greatest concern—bears, big cats, and primates. The observations of the experts, as well as an analysis of the history of Maryland's roadside zoos, confirm that a stronger state law is needed to ensure that Maryland's captive wildlife is treated humanely and safely housed.

Maryland Law

Maryland law prohibits importing, offering for sale, trading, bartering, possessing, breeding, or exchanging specified animals. This law generally allows people who possessed such animals before May 31, 2006, to keep their animals, and includes several exemptions for facilities that want to continue breeding and acquiring such animals. A violation of the law is punishable as a misdemeanor and facilities may be fined up to \$10,000 for noncompliance. Md. Code Ann. CRIM LAW § 10-621.

Species regulated under the law:

- members of the cat family other than the domestic cat;
- primates, including lemurs, monkeys, chimpanzees, gorillas, orangutans, marmosets, lorises, or tamarins;
- bears, foxes, skunks, or raccoons;

About the Experts

Mel Richardson, DVM, is a veterinarian with more than 40 years of experience providing care for animals residing in accredited zoos, circuses, and in private ownership. He has consulted with numerous nonprofit organizations and government agencies regarding the welfare of animals in facilities across the country and internationally. Dr. Richardson served on the Board of Directors for Chimpanzee Sanctuary Northwest, a GFAS-accredited facility, from 2010 to 2013.

Richard Farinato, recently retired from The HSUS, has more than 40 years of training and professional expertise in the care of captive wild animals. Farinato worked with numerous organizations and government agencies regarding the welfare of animals in facilities across the country and internationally and, over the course of his career, provided direct care and/or managed the care of animals in accredited zoos, in private ownership, in research centers, in rehabilitation centers, and in sanctuaries. Farinato managed all five animal care facilities of the HSUS and The Fund for Animals.

Representing more than 80 years of collective experience with captive animals, Dr. Richardson and Farinato can identify when captive conditions undermine animal health and welfare. After their visits, these experts concluded that the conditions at Catoclin Zoo, Plumpton Park Zoo, and Tri-State Zoo do not meet minimum standards of care necessary to protect animal welfare and ensure proper and safe handling and containment. Unless otherwise noted, information in this report about these facilities and associated welfare concerns reflect the observations of Dr. Richardson and Farinato.

- caimans, alligators, or crocodiles;
- hybrids of a member of the cat family and a domestic cat if the hybrid weighs over 30 pounds;
- members of the dog family other than the domestic dog;
- hybrids of a member of the dog family and a domestic dog;
- venomous snakes in the family groups of Hydrophidae, Elapidae, Viperidae, or Crotolidae.

The following entities are exempted from the law:

- an exhibitor licensed under the federal Animal Welfare Act that displays the animals in a public setting as the exhibitor's primary function
- a research facility or federal research facility licensed under the AWA
- a person who possesses a valid license or permit issued by the Department of Natural Resources to import, sell, trade, barter, possess, breed, or exchange a prohibited animal
- an animal sanctuary that meets all of the following requirements:
 - is a nonprofit organization qualified under § 501(c)(3) of the Internal Revenue Code
 - operates a place of refuge for abused, neglected, impounded, abandoned, orphaned, or displaced wildlife
 - does not conduct commercial activity with respect to any animal of which the organization is an owner
 - does not buy, sell, trade, lease, or breed any animal except as an integral part of the species survival plan of the Association of Zoos and Aquariums
- an animal control officer under the jurisdiction of the State or a local governing authority, a law enforcement officer acting under the authority of this subtitle, or a private contractor of a county or municipal corporation that is responsible for animal control operations
- a person who holds a valid license to practice veterinary medicine in the State and treats the animal in accordance with customary and normal veterinary practices
- a person who is not a resident of the State and is in the State for 10 days or less for the purpose of traveling between locations outside of the State

The USDA Loophole

As detailed above, Maryland law is severely weakened by an exemption for any “exhibitor licensed under the federal Animal Welfare Act [“AWA”].” This exemption allows exotic pet owners and unqualified facilities to circumvent the purpose of the state law—to restrict the private possession of dangerous wild animals to qualified facilities—by simply obtaining an exhibitor license from the USDA.

The AWA, which is enforced by the USDA, establishes minimum standards of care and treatment for certain animals bred and sold for use as pets, used in biomedical research, transported commercially, or exhibited to the public. 9 C.F.R. Parts 2-3. The AWA's minimum standards address housing, handling, sanitation, nutrition, water, veterinary care, and protection from weather extremes. The USDA encourages regulated facilities to exceed these minimum federal standards, which often are designed as performance standards (which can often be difficult to enforce), rather than engineering standards. For example, the space requirement for bears and big cats simply states that “enclosures shall be constructed and maintained so as to provide sufficient space to allow each animal to make normal postural and social adjustments with adequate freedom of movement.” 9 C.F.R. § 3.128.

Animal exhibits that are open to the public, such as zoos, must be licensed by the USDA whether they are accredited or owned by a state, county, or other local government; corporations; foundations; or private individuals. The AWA plays a very limited role in animal protection, and the USDA alone—which has only 136 inspectors for more than 15,000 regulated facilities—lacks the resources and personnel necessary for providing sufficient protection for animals used in exhibition.

Further, a 2010 USDA Office of the Inspector General audit criticized the agency for its failure to recognize safety-related violations. The audit found that, “[USDA] inspectors do not cite apparent safety concerns or require corrective actions until an event—such as an escape or attack by a dangerous animal—has already occurred.” At one facility, visitors could reach their hand into a cougar’s cage. At another facility, a plastic chain as low as 12 inches above the ground was all that separated groups of schoolchildren from caged tigers, bears, lions, and other dangerous animals. Further, licensees are not required to report animal escapes or attacks by dangerous animals.³

Unfortunately, a USDA license is no guarantee of humane and safe animal care because:

- Federal licenses are easy to obtain, but difficult for the agency to revoke and are renewed every year, even when a licensee has had serious and repeated AWA violations.
- An individual can obtain a license for as little as a \$40 application fee and after passing a routine inspection, regardless of the person’s expertise or experience in animal care.
- An exhibitor who has only domestic animals, such as dogs and rabbits, can acquire a license, yet is then free to acquire big cats, bears, and primates without prior agency approval.
- USDA exhibitors can keep animals in unsafe and inhumane conditions, yet still be in compliance with the limited and inadequate standards of the AWA.
- Some USDA licensees have been convicted of serious and violent crimes.^{4,5,6,7}

- Since the USDA typically does not confiscate animals when a license is revoked, state agencies are often responsible for seizing, placing, and transporting dangerous animals from noncompliant facilities.
- If a USDA license is revoked, instances have occurred where a new license is issued to a friend or family member of the original licensee, allowing an AWA offender to continue business as usual under a different name.^{8,9,10,11}
- Audits issued in 1996 and 2010 by the Office of the Inspector General found that numerous USDA licensees were actually pet owners, not bona fide exhibitors and some of these people may have obtained a USDA license specifically to become exempt from state laws.^{12,13}

Accreditation

Accreditation by the AZA ensures that highly qualified, knowledgeable, and experienced professionals provide superior care for animals in a safe and secure environment. AZA standards, policies, and procedures greatly exceed the minimum standards of the federal AWA (7 U.S.C. §§ 2131 *et seq.*; 9 C.F.R. Parts 1-3).^{14,15,16,17,18,19,20,21,22,23,24,25,26,27,28,29,30,31}

For example, the AWA has no requirements for insurance, 24-hour security, or financial stability; USDA inspections are typically conducted by a single animal care inspector or veterinary medical officer who may not have sufficient knowledge of exotic species; and the USDA does not prohibit the trade in pet primates and many other exotic species.

The positive results of safety protocols required for AZA-accredited facilities is reflected in a review of dangerous incidents, which reveal that non-AZA facilities account for 82 percent of deaths and 80 percent of injuries caused by captive bears, big cats, and primates at USDA-licensed facilities

AZA Standards, Policies, and Procedures

Inspection Process

A team of specially-trained inspectors, including at least one veterinarian as well as animal and operations experts, spends several days visiting every area of an applicant's facility, interviewing staff, checking records, reviewing protocols, ensuring financial stability, and examining physical facilities and animals.

Insurance

Insurance is required to cover visitors, staff, volunteers/docents, and physical facilities.

Safety and security

- Year-round 24-hour security.
- Written safety procedures, manuals, and protocols.
- Contingency plans in the event of animal escape.
- Periodic emergency drills for each basic type of emergency (fire, weather or environment; injury to staff or a visitor; animal escape).
- Alarm systems for animals posing serious threat of catastrophic injury and/or death.
- Training and procedures required regarding zoonotic diseases.
- Antivenin available for emergency treatment of venomous snake bites.

Animal welfare

- Provides species-specific behavioral enrichment and husbandry that greatly exceed the minimum standards of federal law.
- 16-member Animal Health Committee ensures high quality and comprehensive animal health care.
- 31-member Animal Welfare Committee develops assessment tools and drives the creation of Animal Care Manuals.
- Veterinary coverage must be available to the animals 24 hours a day, 7 days a week.
- Keepers trained to recognize abnormal behavior and clinical symptoms of illness and dietary and husbandry requirements.

nationwide since 1990.** For example, all of the deaths, 90 percent of the injuries, and 82 percent of the escapes involving captive bears at USDA-licensed facilities were at non-AZA accredited facilities. Similarly, 78 percent of the deaths, 81 percent of the injuries, and 75 percent of escapes involving captive big cats at USDA-licensed facilities occurred at non-AZA facilities.

Comparing the USDA inspection reports from Maryland's AZA-accredited zoos versus Maryland's privately-run and non-accredited roadside zoos from 2006 to present illustrates the importance of limiting the possession of especially dangerous species to zoos that are accredited and capable of providing appropriate, safe, and humane long-term care.

AZA Standards, Policies, and Procedures

Controlled substances

Written, formal procedures must be available to the animal care staff for the use of veterinary drugs and appropriate security of the drugs must be provided.

Exotic Pets

Maintains a policy recognizing that wild animals do not make good pets.

Sample disposition policy (primates)

Primates may not be sold, traded, or given to individuals or to animal dealers known to place primates with individuals.

Illegal trade in tiger parts

Supports proposed federal regulations for an important monitoring tool to help prevent captive tigers in the U.S. from fueling the illegal black market for tiger parts.

USDA Inspections of Maryland Zoos 2006 - 2013	Non-AZA Accredited			AZA Accredited	
	Catoctin	Plumpton Park	Tri-State	Baltimore Zoo	Salisbury Zoo
Violations categorized as directly impacting animal welfare	✓	✓	✓		
Insufficient number of adequately trained employees	✓	✓	✓		
Inadequate public safety barriers around big cats, bears, and/or primates	✓	✓	✓		
Failure to provide minimum space	✓	✓	✓		
Filthy cages	✓	✓	✓		
Failure to provide environmental enrichment to promote the psychological well-being of primates	✓	✓	✓		
Animal escape or attack	✓	✓	✓		
License suspension, penalty, and/or open investigations	✓	✓	✓		
Number of regulated animals in recent inventory	322	90	69	344	45

Like AZA, GFAS standards, policies, and procedures significantly surpass the AWA's minimum standards. GFAS' rigorous accreditation process focuses not only on humane care, safety, and security, but also on responsible sustainability, to make certain that sanctuaries will thrive in order to provide for the animals in their care over the long term. For example, accredited sanctuaries must have a written three-year strategic plan, a long-term financial plan, financial reserves to cover at least three months of operating costs, and a succession plan for its continued operation should the director or other key management be unable to continue in their positions.

GFAS accreditation or verification also ensures that a facility meets the definition of a legitimate sanctuary or rescue center. For example, true sanctuaries prohibit commercial trade of animals, observe strict ethical practices in fundraising and the acquisition and disposition of animals, and do not breed animals unless breeding is part of a bona fide breeding-for-release program. GFAS has accredited or verified more than 130 sanctuaries or rescue facilities.

Zoo and sanctuary professionals also understand the risks of zoonotic diseases (infectious diseases that are transmitted from animals to humans) and wear protective gear including goggles, face mask, lab coat, and shoe covers while working around certain primate species, yet privately-run menageries and roadside zoos are unlikely to take any precautions. In addition to posing physical dangers, primates can spread deadly viral, bacterial, fungal, and parasitic infections that pose serious health risks to humans, such as tuberculosis, shigellosis, campylobacter, klebsiella, herpes B, Simian Immunodeficiency Virus, and poxviruses.^{32,33} In fact, more than a hundred zoonotic diseases have been identified in primates.³⁴ While contracting some infectious diseases from primates may be rare, the consequences can be death or permanent disability.



The macaque cage at Tri-State Zoo was located in an unmonitored petting zoo area.

For example, according to the Centers for Disease Control and Prevention, up to 90 percent of adult macaques are infected with the herpes B virus. The virus can be spread through bites, scratches, and contact with bodily fluids and has a greater than 70 percent fatality rate in untreated human patients.^{35,36} In 1997, a Yerkes primate researcher in Atlanta died of herpes B after she was splashed in the eye with bodily fluids from a rhesus macaque.³⁷ Only three of the 40 macaques exhibited in Maryland are at an AZA-accredited zoo.***

Problems at Maryland's Roadside Zoos

Maryland's roadside zoos illustrate the weaknesses of the AWA in addressing roadside zoos. Serious problems persist at these facilities despite long histories of violations. These facilities have repeatedly been cited for an insufficient number of adequately trained employees; inadequate public safety barriers around big cats, bears, and primates; animal attacks and escapes; failure to provide minimum space; filthy cages; and failure to provide environmental enrichment to promote the psychological well-being of primates. Yet despite ongoing federal citations, these facilities continue to operate in a manner that undermines public safety and animal welfare.

During site visits in September 2013, The HSUS experts found that these facilities failed to provide basic husbandry to many animals. They also had infrastructure in various stages of disrepair; inadequate cage sizes; safety risks to animals, keepers, and the public; filthy, foul-smelling, and unsanitary conditions; numerous veterinary concerns; inadequate shelter; muddy enclosures; inadequate staffing; little-to-no environmental enrichment; improper and unsanitary feeding; dirty drinking water; housing together incompatible animals; inadequate lighting; poor ventilation; and poor housekeeping.

Removing the USDA loophole for possession of bears, big cats, and primates in Maryland law would allow roadside zoos and other private menageries to invest their limited resources in improving conditions for species that may be easier and less expensive to care for while greatly reducing the safety risks posed by highly dangerous species kept in captivity.

Bears are among the most challenging species to keep humanely in captivity. They are intelligent, possess great strength and dexterity, and are active for up to 18 hours a day, spending much of their time foraging and exploring. When kept without a mentally-challenging and physically-stimulating environment, captive bears are especially prone to neurotic behaviors such as pacing, walking in circles, rolling or bobbing their heads, or swaying from side to side, which are indicators of poor welfare and substandard conditions.^{38,39}

Captive big cats, unable to meet their instinctual needs, may exhibit neurotic behaviors such as pacing, tail-chewing, toe-sucking, or excessive grooming.^{40,41,42,43} In fact, scientists have found significantly higher stress levels in caged carnivores who, in the wild, would roam vast territories.⁴⁴



A bored, solitary gibbon at Catoctin Zoo lacks companionship.

Primates are extremely intelligent and lead busy, active, stimulating lives. Most are highly social and naturally live in pairs or family groups with whom they travel, groom, play, build nests, sleep, and raise their offspring. Many primates spend up to 70 percent of their waking hours in foraging-related activities. Primates have excellent climbing abilities and many are arboreal. All too often, captive primates in roadside zoos are denied mental stimulation, sufficient exercise, proper diets, and interaction with others of their kind.

Abnormal behaviors for primates kept in poor conditions include repetitive movements, such as pacing, circling, rocking, spinning, clapping themselves, biting themselves, over-grooming, and plucking their hair, resulting in bald patches.⁴⁵

The following information details the many problems found at Maryland's roadside zoos.

Catoctin Zoo

Owner: Richard Hahn
Location: Thurmont, Maryland
USDA License #: 51-C-0034

Catoctin Zoo is accredited by the deceptively-named "Zoological Association of America," a fringe group with weak standards that endorses poorly run roadside zoos and promotes the private ownership of dangerous exotic pets and the commercialization of wildlife. Despite threats to public safety and negative animal welfare impacts, ZAA standards allow public contact with dangerous wild animals. ZAA has no affiliation with the highly respected AZA, which has a long history of setting industry standards for zoological institutions.



Inventory

Three tigers, two lions, two leopards, one jaguar, five sun bears, two gibbons, one spider monkey, 12 capuchins, 11 lemurs, 8 vervets, 10 squirrel monkeys, 30 macaques, 11 patas monkeys, four tamarins, one marmoset, three addax, three porcupines, one hedgehog, six bison, four water buffalo, one wild ass,

43 sheep, three binturong, one wildebeest, seven blackbuck, two bobcats, five coatimundis, two capybaras, six chinchillas, four peccaries, two zebras, two dingoes, five camels, 42 bats, 13 fallow deer, two fossa, 24 goats, four wolves, one alpaca, one sloth, three llamas, one New Guinea singing dog, pigs, one raccoon, two wallabies, one oryx, 11 meerkats, one genet, three alpaca, two warthogs, two yaks, one armadillo (as of September 4, 2013 and September 30, 2013***)

USDA Inspection Summary

Since 2006, Catocin Zoo has been cited by the USDA for 25 violations of the AWA. Violations include:⁴⁶

- Failure to have adequately trained and appropriately supervised employees after a keeper who had been on the job for only two months was mauled by two jaguars.
- Failure to provide veterinary care to underweight animals.
- Failure to provide minimum space to three sun bears kept in an 8.5' x 8.5' x 8' cage in the off-exhibit area.
- Repeated failure to maintain the structural strength of facilities and other maintenance issues, including for an 11-year-old cougar who was euthanized after being attacked by a wolf in an adjacent cage and for a camel who escaped.
- Failure to provide an adequate environmental enrichment plan to promote the psychological well-being of primates.
- Repeated failure to provide animals with adequate shelter or any shelter at all.
- Repeated failure to provide adequate ventilation and lighting in the off-exhibit housing area for primates.
- Failure to prevent animals from being fed possibly noxious or toxic plants by the public.
- Repeated failure to properly clean and sanitize enclosures.
- Filthy food storage areas.
- Inadequate pest control.



A cougar at Catocin Zoo was euthanized after being attacked by a wolf in an adjacent cage.

The HSUS Inspection Summary

Catoctin Zoo had injured animals, inappropriate mixed-species exhibits, undersized and outdated cages, poorly designed, unhealthy, and potentially unsafe exhibits, filthy conditions, a lack of enrichment for many species, and enclosures in disrepair. Many cages lacked appropriate cage features, such as substrates that allowed digging and foraging, pools for certain species, adequate climbing structures, elevated platforms, shift cages for potentially dangerous species, and privacy areas or visual barriers to allow animals to remove themselves from public

viewing or cage mates, which are necessary to prevent excessive stress. Cages were too small and barren and many had concrete flooring, which tends to trap bacteria. In addition, the unforgiving nature of concrete is harmful, causing skin or coat problems, worn, cracked, or painful foot pads, pressure wounds, and premature arthritis and joint problems.



A bent, sagging fence next to a tiger cage at Catoctin Zoo could easily allow a child to penetrate the public safety barrier.



The shockingly inhumane and outdated sun bear cage at Catoctin Zoo pictured above is a far cry from the one-acre natural habitat enclosure that the AZA-accredited Oakland Zoo provides to its sun bears.

Bears

According to the experts, the sun bear enclosure at Catoctin Zoo was the worst exhibit among the three facilities visited and the conditions were clearly inhumane. The small, barren, concrete cage was completely devoid of enrichment items to encourage natural behaviors and alleviate boredom. There was no evidence that staff had taken any steps to address the extreme neurotic behavior exhibited by the bears, which included excessive pacing. Zoo professionals have long

recognized, and numerous studies confirm, that stereotypic behaviors are an indicator of poor welfare.⁴⁷

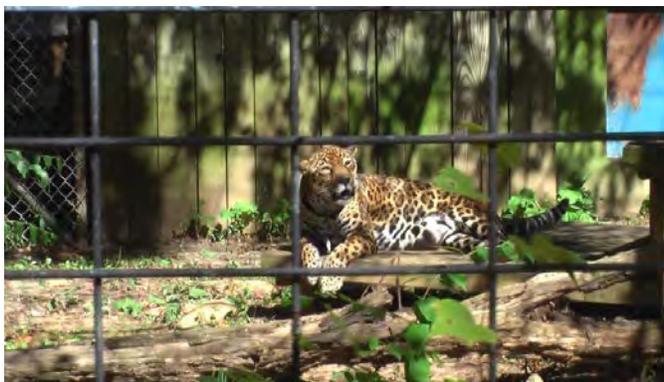
After reviewing photos of Catoctin's sun bear cage, Cathy Keyes, lead keeper at the AZA-accredited Oakland Zoo in California, stated, "The Catoctin Zoo sun bear exhibit appears to be outdated and not reflective of current best practices in regard to sun bear husbandry." In stark comparison, Keyes describes the enclosure for the three sun bears at Oakland Zoo as a large, natural one-acre enclosure that promotes a wide range of species-appropriate behaviors, such as climbing, digging, bathing, foraging, resting, sunning, exploring and manipulating objects, all of which are vitally important to the physical and psychological well-being of bears. The substrate is grass, dirt, low-lying vegetation, and bushes. Adding to the complexity of this natural space, the Oakland Zoo added two 20-foot high log structures, felled trees, fire hose hammocks, log piles, two 15-foot high concrete "trees" and a 30-foot long shallow pool with a waterfall. Food items are buried, requiring digging; placed up high, requiring climbing; and presented in various enrichment devices, requiring the manipulation of objects. The sun bears at Oakland Zoo prefer to be up high in their hammocks, resting on elevated log structures or the high branches of a 60-foot tall eucalyptus tree.

"The Catoctin Zoo sun bear exhibit appears to be outdated and not reflective of current best practices in regard to sun bear husbandry."

Cathy Keyes, lead keeper at
the AZA-accredited Oakland Zoo

Big Cats

In 2009, an animal care worker at Catoctin Zoo was critically injured by one, and possibly two, jaguars after she failed to secure the animals' inside area before working in it. Both jaguars entered the area and the woman was attacked by the nearly 200-pound male jaguar and possibly the female jaguar as well. Employees used a shovel, a 2-by-4 piece of lumber, and a fire extinguisher to fend off the jaguars. The keeper spent 10 days in the hospital for injuries to her face and upper body. The



The jaguar is likely able to reach his leg through the wide gaps in the fencing at Catoctin Zoo.

zookeeper had been an employee of the zoo for only two months and was not under the direct supervision of a more experienced and knowledgeable person during the time of the attack. In response to the incident, the USDA cited Catoctin for failure to have adequately trained and supervised employees

to maintain an acceptable level of husbandry practices.^{48,49,50} However, unsafe conditions persist at this facility.

It has been documented that tigers are able to jump at least 16-feet vertically, yet one of the white tigers at Catoctin Zoo was housed in an enclosure with an estimated 10-foot high fence with a two-foot kick-in (the top portion of the fence turned inward toward the exhibit at a roughly 45-degree angle) that may have been insufficient to safely contain the tiger.⁵¹

Additionally, the chain link fencing to the left of the public viewing area for the tiger cage was flimsy, bent, and sagging and there was a significant gap between this fence and the public safety barrier parallel to the tiger cage.



The fence for the tiger enclosure at Catoctin Zoo may not be high enough to safely contain a tiger.

Further observations by Farinato and Dr. Richardson include that the jaguar is likely able to reach a limb through the wide gaps in the cattle panel fencing, the ceiling in the jaguar cage was sagging, and there was no pool for the jaguar, even though jaguars are one of the large cat species that seeks out wet environments in the wild. The leopard was pacing in an undersized cage and a worn path indicated the pacing is chronic. There were inadequate elevated platforms to allow the leopard to recline or stretch and there was no pool. The shift area for the leopard was too small and had no roof to provide shelter from inclement weather. The chain link fencing in the African lion cage was sagging and bowed outwards and the netting used for the cage ceiling was constructed of flimsy plastic.

Primates

Catoctin houses more primates than all other zoos in Maryland combined, yet there was no evidence of a comprehensive enrichment strategy for any of the primates.***



This capuchin cage is not large enough for one capuchin, let alone the dozen capuchins listed in Catoctin Zoo's inventory.

Food for the crowded, undersized capuchin cage ended up on the ground beneath the wire flooring, raising concerns that some animals may not be receiving an adequate diet and that the food becomes contaminated with excrement. There were an insufficient number of perches and the cage space was inadequate for the number of animals.

The gibbon was singly-housed and the cage was not near any other primate species. Since all gibbon species naturally live as bonded pairs, isolation of a single animal can be stressful and depressing. No enrichment materials or activities were in evidence. There was no shift cage to allow keepers safe access to clean and maintain the enclosure.

The macaque cage was crowded and largely barren and there was evidence of rampant breeding. The concrete floor was in disrepair and the public safety barrier was constructed of cattle panels that were loose and not secured to upright posts.

There were several problems with the mixed lemur exhibit. A single brown lemur was observed in the cage that contained several ring-tailed and ruffed lemurs. Brown lemurs are a more timid and much



Without adequate enrichment, this young macaque at Catoctin Zoo tried to entertain himself by grabbing a handful of gravel.

smaller species. A brown lemur would not be able to compete with the larger lemurs and would not be

part of such social groups. The brown lemur was too thin, the tail had thinning fur, and he or she appeared depressed and inactive and segregated in a corner. Pigeons, doves, pheasants, and water fowl inside the exhibit could result in disease and parasite transmission and puts the birds at risk of attack by the lemurs. The lemur cage was filthy and had not been raked or spot cleaned and contained old dry browse and cobwebs. Bird feces and leaf litter can become a vehicle for disease transmission.

A cage housing tamarins, a sloth, and an armadillo had insufficient lighting, was poorly ventilated, and the windows were filthy. This was not an appropriate mixed species exhibit since the armadillo and sloth will be active at night and interfere with the tamarins' ability to get proper sleep.

Complaints from the Public

Today's sophisticated zoo visitors have higher expectations than the impoverished conditions found at Catoctin Zoo, as evidenced by a few of the comments posted on TripAdvisor.com by disappointed Catoctin Zoo visitors:^{52,53,54,55,56}

"Waste of \$30, left feeling depressed about how animals were treated.."

●●●●● Reviewed March 11, 2012

My boyfriend and I decided to go out and do something outdoorsy today since it was gorgeous..so we got our 5 month old daughter together and to say the least we were both pretty excited. We drove over 40 minutes to get to the zoo...the drive there was nicer than the zoo itself. Apparently we got a 2 dollar discount since right now it's not summer. Anyway we got there and it was horrible..weeds everywhere, leaves, rock paths which were NOT stroller friendly. The animals look extremely depressed you can tell that these people do NOT take care of their animals, they look tired, underfed, and worn out. Cages were WAY too small..animals seemed lethargic. The only neat part of the zoo in our opinion was the Meerkat babies, Koi pond, and the reptiles. Unfortunately most of the animals and exhibits were closed down. I was extremely disappointed. The entire park looked unkept and dirty. NO hand sanitizer in ANY of the dispensers through out the park which was so lovely after petting the goats..and there wasn't even in soap in the bathrooms. We wanted to ask for a refund but there was no point..in our eyes at least that 30 dollars we paid will hopefully go toward animal food. I have an extremely difficult time understanding why admission is so high for something so low class. When I was a child this was such an awesome trip to go with my family..what happened? Not giving this place another try.

Don't say you weren't warned. You're better off saving your money and spending it to get to a National Zoo.

"VERY DISAPPOINTED!"

●●●●● Reviewed August 31, 2013

This zoo is very unkept. Several of the water bowls were filthy and covered with rotting leaves. Most of the animals shown on their website were no where to be found. The zoo grounds shown on their website is definitely not the zoo we saw. The animals that are in their buildings are very hard to see due to dim lighting. None of the concession stands were open and their drink machine was broken so we couldn't even get a drink. Very disappointing and sad to see. We left feeling sorry for the animals that have to live there!

"Depressing zoo"

●●●●● Reviewed August 16, 2013

This zoo is way too small for the type of animals that they have residing there. They have exotic animals in there and they supply cups of food to purchase so that people can feed the animals. That is a recipe for disaster. You have hundreds of people going through this small, dirty, run-down zoo every day and maybe 70% of those people buying food to give to the animals. They are eating way too much food. Aside from that the animals appear distressed and depressed; most of them restlessly pacing their small living space. When I visited last year, there was a black bear who was just laying in his tiny cage on his back and side with a distressed look on his face. He cage was covered in feces and wet; it also smelled terrible (and it's in the open air). I really think they should rethink the animals they have there. It's a real shame to see some of these beautiful creature suffering like this.

“poor management”

●●○○○ Reviewed October 13, 2013

large animals in small cages with no companion, sad. most of the zoo was very stinky, not kept clean. large amount of cages were missing identification signs, layout bad, couldn't see some animals due to trees or buildings. took kids and grandkids hoping for a nice day. Grandkids(3&5) had pretty nice time, but for adults...couldn't take photos of animals due to cage wire, no good photo ops for the grandkids. couldn't take safari ride because they want a large amount of the bus filled. push button recordings at cages either didn't work or were not on. Overall a very dissappointing experience and I think some animal protection/rights groups ought to look into this place.

“very sad place for animals”

●○○○○ Reviewed July 24, 2012

I had visited this dismal place a few years ago and I only went back to see if things had improved somewhat. Unfortunately I was very disappointed. This park is more like a prison for animals. Very small enclosures with nothing to provide stimulation for the animals. Overgrown shrubs and grasses around the cages. Animals look depressed and bored. This place should not even exist. If you care about animals-do not go and if you have been there and were disturbed by what you saw, make sure you complain to Animal Control or write a letter to your local paper.

Plumpton Park Zoo

Owners: Nick and Cheryl Lacovera
Location: Rising Sun, Maryland
USDA License #: 51-C-0021

Inventory

Two tigers, one cougar, four bears, two siamangs, one capuchin, one porcupine, 12 alpacas, two bison, three foxes, two jackals, one bobcat, three zebras, one cow, two camels, seven rabbits, 11 fallow deer, one giraffe, three goats, four wolves, five prairie dogs, 10 muntjac, three llamas, two Patagonian cavies, three pigs, one serval, two sheep, one white-tailed deer (as of October 23, 2013^{***})



USDA Inspection Summary

Since 2006, Plumpton Park Zoo has been cited by the USDA for 109 violations of the Animal Welfare Act, including 53 violations since September 2010 when the new owners took over.⁵⁷ Violations include:

- 27 citations that were categorized as repeat violations
- 25 violations that were categorized as directly impacting animal welfare
- 6 veterinary care violations, including:
 - a 2008 incident in which two black bears escaped from their enclosure when a zookeeper failed to secure their cage and one of the bears was killed because she became aggressive and the zoo did not have adequate safety equipment, trained personnel, and tranquilization equipment to safely recapture her
 - the death of an anemic, flea-infested juvenile tiger suffering from metabolic bone disease
 - a siamang who was being treated for a recurring gastro-intestinal infection and had not

- received proper follow-up care to prevent re-infection
- an adult sheep who had a heavy wool coat in July and was panting when he/she stood and walked
- 10 violations for inadequate public safety barriers around numerous animals, including two bear cubs and a baboon.
- 5 violations for failure to have a sufficient number of adequately trained employees.
- 41 violations for enclosures and perimeter fencing in disrepair, including for a squirrel monkey who escaped and was killed by an owl, a baboon who was digging a hole under a chain link enclosure, and a large dirt pile against the fence of a wolf enclosure that would have required a jump of only 76 inches for the wolves to escape.
- Failure to separate a muntjac from another muntjac who had injured him/her in a fight and the injured muntjac was subsequently found dead with fresh cuts on his body.
- Failure to provide sufficient space to a porcupine housed in a filthy 30-inch by 48-inch wire cage.
- Repeated failure to provide adequate shelter.
- Repeated failure to have an adequate environmental enrichment plan to promote the psychological well-being of primates.
- Repeated failure to provide adequate pest control.
- Repeated failure to provide animals with food that was wholesome.
- Failure to remove a poisonous plant (pokeweed) in enclosures containing bison, llamas, and deer.



Plumpton Park's old-fashioned animal display cages are woefully behind current industry standards.

An August 2010 inspection notes that USDA animal care inspectors were accompanied by a senior investigator from the USDA's Investigative and Enforcement Services, which is an indication that the agency has opened an investigation into AWA violations at Plumpton Park Zoo.

A June 2013 inspection report that contains violations for unsafe handling of bear cubs, enclosures in disrepair, inadequate shade, and poor drainage included a note that stated, "Licensee refused to sign the inspection report," suggesting that the current owners have little interest in cooperating with federal officials.

The HSUS Inspection Summary

Numerous enclosures at Plumpton Park Zoo were filthy and foul-smelling. Cage areas and surrounding structures contained clutter, debris, and old bedding. There was a lack of attention to general facility maintenance and numerous areas were in various stages of disrepair. Electrical extension cords were haphazardly strung about fencing, cages, and trees posing a risk of fire, electrical shock, and loss of power. The cage sizes were inadequate for wide-roaming carnivores, fencing was bowed and sagging in several areas, and cages for numerous animals lacked adequate privacy areas or features such as trees, shrubs, rocks, tree limbs, or artificial objects.



Crossbeams supporting the chain link roof for the adult bears at Plumpton Park Zoo appeared to be structurally unsound, which could create an opportunity for a bear to escape.

Bears

In 2008, two black bears escaped from their enclosure at the Plumpton Park Zoo when a zookeeper failed to secure the cage. One of the bears was killed because she became aggressive and the zoo did not have adequate safety equipment, trained personnel, and tranquilization equipment to safely recapture her.⁵⁸



In June 2013, Plumpton Park Zoo was cited by the USDA for allowing unsafe public contact with bear cubs.

In September 2013, the zoo had two adult bears and two cubs. The cage size for the adult bears was inadequate and lacked sufficient water for swimming and submerging. Crossbeams supporting the chain link roof appeared to be structurally unsound, which could create an opportunity for a bear to escape or be injured if the roof were to loosen or collapse.

Two bear cubs born at the zoo in January 2013 were prematurely pulled from their

mother when they were only a month old because the zoo owners mistakenly believe that hand-reared bears are somehow "tame."⁵⁹ According to bear expert Else Poulsen, who has more than 25 years of experience working in AZA-accredited zoos, "Plumpton Park Zoo's premature separation of two 1-month-

old bear cubs from their mother has severe, long-term behavioral impacts for the cubs, and bear experts agree that hand-rearing cubs should only be done as a last resort. Research has demonstrated that when bears are deprived of maternal influence during their formative years, they are more prone to stress, anxiety, and entrenched stereotypes. It is a myth that human-raised cubs will grow into 'tame' adult bears who are easier to handle. All bears, regardless of their rearing and environment, are dangerous wild animals and keepers that fail to recognize the immense dangers associated with such powerful animals are putting themselves and the public at risk." In June 2013, the USDA cited Plumpton Park for allowing unsafe public contact with the bear cubs.

"It is a myth that human-raised cubs will grow into 'tame' adult bears who are easier to handle."

Else Poulsen, bear expert

Big Cats

Despite having inadequate caging for big cats and insufficient staff, the Plumpton Park Zoo acquired a pair of 1-year-old tigers in September 2012 from a defunct roadside zoo in Wisconsin.^{60,61}



In 2012, Plumpton Park Zoo acquired a pair of tigers from a defunct roadside zoo in Wisconsin.

The zoo has also announced its intention to acquire a lion.⁶² The cage size and pool were inadequate for the tigers and the perimeter fence adjacent to the cage appeared to have deficiencies.

In 2010, shortly before Ed Plumstead sold the zoo to New Jersey residents Nick and Cheryl Lacovera, a juvenile tiger who was hand-reared and living in a keeper's home died after ingesting plastic materials and cloth. A necropsy revealed extreme neglect. The tiger was anemic, had a heavy flea infestation, and suffered from metabolic bone disease, which is often associated with an improper diet.⁶³

Primates

Even though enrichment and social considerations were not adequately addressed for the three existing primates at Plumpton Park Zoo, the zoo's owners told a reporter during a 2010 interview that they intended to add orangutans (a highly intelligent and endangered species) to their collection.⁶⁴

Dr. Richardson and Farinato observed that the capuchin lived in isolation and had several balding patches, indicating possible over-grooming due to stress and boredom and there was an extreme lack of sufficient lighting in the capuchin's indoor cage. The siamangs' small cage was cluttered with so many tree branches that it prevented the siamangs from effectively moving about the cage, let alone brachiating.

The experienced and trained professionals at the AZA-accredited Oakland Zoo house their two middle-aged siamang brothers on an island measuring 75-feet long and 45-feet across at the widest point. The Oakland Zoo makes extensive use of vertical space to provide natural behavioral opportunities for the animals. There are four 20-foot high palm trees, three 15-foot high Acacia trees, and four 30-foot high poles with resting platforms. There are also nearly a dozen 10-foot high metal sway poles placed at a variety of angles and interconnected with



Unlike the small siamang cage pictured above at Plumpton Park Zoo, the AZA-accredited Oakland Zoo provides its two siamangs with a 75-foot long island that includes multiple climbing structures up to 30-feet tall.

rope. Siamang apes in the wild rarely, if ever, spend time on the ground and will forage, rest, and move through the rainforest canopy by brachiating. The network of ropes on Oakland Zoo's Siamang island allows the animals to brachiate in all directions and elevated resting platforms allow them to rest up high as they might in the wild. As leaf eaters, the siamangs also take advantage of the exhibit's tree leaves and grasses as a natural part of their diet.

Complaints from the Public

Plumpton Park Zoo visitors, disheartened with conditions they found, posted comments on Google.com and TripAdvisor.com: ^{65,66,67,68,69,70}

“Absolutely Horrible”

●○○○○ Reviewed November 17, 2013

[...] We found that the enclosures were often too small, dirty, and did not even try to emulate the animals' natural habitats. The animals looked sad and as if they weren't well cared for. [...].

“Plumpton Park Zoo”

●○○○○ Reviewed June 26, 2012

Went on a first grade field trip with my kids. Run down, animals dirty, seems to have gone down hill over the years.

Rob C

★ ★ ★ ★ ★ 3 months ago

I'm a bit skeptical of some of the reviews that I'm seeing here, and think most of them are from staff. This Zoo is not very well kept and animals enclosures are pretty small. The Brown Bear, Bengal Tiger, Bobcat, and Mtn Lion enclosures to be specific. Animals there are pretty much caged in a cramped chain link mud pit. The Bison, Camel, Giraffe, and Bull get a couple of acres to roam so its not like there isn't room there for better habitats. It is a really saddening sight to see. The reptile house was really lacking. Seen better displays in many pet stores, and better kept at that too.

The park itself is a bit on the dumpy side, paths are muddy and really don't seem to be too adequate for the handicapped. Picnic area was just one giant mud pit which at one time was just covered in wood chips... now rotted. Tables were all filthy. The snack area was much the same. Only option for food was hot dogs and still had to wait 15 minutes to cook four of them.

Overall I would say it is one Zoo I would never return to, and never recommend. It was a very depressing ride home from the visit after seeing how poorly the animals were taken care of and the overall state of the zoo. I didn't want to give them one star but it wouldn't let me post the review with no stars.

Christiana Cook

★ ★ ★ ★ ★ 2 months ago

I'm not quite sure why this place is getting such good reviews. My husband and I went to Plumpton today for the first time and we're very disappointed. They have a variety of animals which is nice, but the enclosures for these animals aren't the best. The enclosures come no where near replicating their homes in wildlife. Some animals actually looked depressed. It left us feeling so sad that these animals were locked up in cages on display. I will not be returning or recommending to any one I know.

Dianna Kruk

★ ★ ★ ★ ★ 2 months ago

This zoo was awesome when the new owners first took over. but now im not so sure. Seems they take in way too many animals but cannot care for them all properly.

When i last went, there were rabbits all over! They clearly did not have the space for them so why get them? The were kept in tiny metal cages and stashed all over the zoo, including several thrown in the emu yard.

One of the keepers took me in to see Jimmys inside part and they told me there were sugar gliders and birds (which you could hear) inside the dark and dusty house with Jimmy. Terrible place for any animals, especially birds!!

And they keep accumulating random animals in the Reptile House. I think they need to take care of and properly house what they currently have before getting any more animals! A lot of the yards were filthy. The poor tigers and wolves are in a giant mud pit! I love this zoo and hope they can turn it back around. At this rate its going to get closed down again.

“This place is a dump”

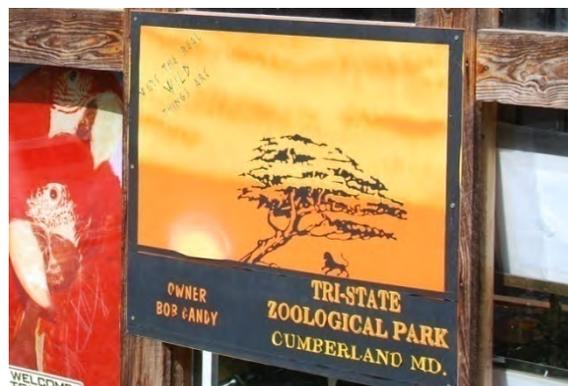
● ● ● ● ● Reviewed August 16, 2013

This place is depressing. Animal cages were dirty and unkempt. The cages also seemed way too small for the size of some of the animals. Most of the animals looked miserable. I felt bad for them. It was hard for my daughter to see a lot of the animals because of how the fences were set up. The "playground" area was hardly a playground and in a mud pit. So disappointed in our trip there as I had been looking forward to taking her there. She was bored after 20 minutes. Don't waste time/money on this place.

Tri-State Zoo

Owners: Robert Candy
Location: Cumberland, Maryland
USDA License #: 51-C-0064

On March 29, 2006, as many as 100 animals—including turtles, parrots, iguanas, monkeys and a python—died in a fire at the Tri-State Zoo. The fire broke out in a two-story building that served as winter quarters for many of the animals. It took dozens of fire companies more than four hours to contain the blaze.⁷¹



As of January 11, 2011, the Maryland Department of Assessments and Taxation reported that the Tri-State Zoo was not in good standing.⁷²

Inventory

Six tigers, two lions, one cougar, two Himalayan black bears, one squirrel monkey, two macaques, two lemurs, one capuchin, one New Guinea singing dog, one wolf, two foxes, one agouti, two alpaca, one coatimundi, one binturong, two bobcats, four kinkajous, one leopard cat, two porcupines, three skunks, one serval, eight cats, one dog, six goats, two llamas, 10 pigs, and three sheep (as of August 21, 2013***)

USDA Inspection Summary

Since 2006, Tri-State Zoo has been cited by the USDA for 130 violations of the AWA, including:^{73,74}

- 52 citations that were categorized as repeat violations
- 13 violations that were categorized as directly impacting animal welfare
- Five violations for failure to properly handle dangerous animals including:
 - Allowing the public to come dangerously close to three 14-month-old tigers and a lion in the off-exhibit area
 - Insufficient public safety barriers for a cougar, squirrel monkey, porcupine, and binturong
- 21 violations for failure to maintain enclosures in good repair to protect animals from injury and safely contain the animals, including:
 - A lion enclosure that, for more than two years, the inspector wrote “may not be constructed in a manner that will adequately contain the animal.” Candy ignored the USDA inspector’s repeated citations because he felt the lion cage was adequate.
 - A dividing fence between two tiger enclosures that, for almost two years, was not sufficiently high to prevent the tiger on either side from jumping into the next enclosure.
 - Two tiger enclosures with outside walls that, for almost two years, were not sufficiently high to contain the tigers.



There was an accumulation of feces in several cages at Tri-State Zoo, including the coatimundi cage.

- A lion enclosure that, for more than three years, had areas that were not adequately secure.
- A tree in a tiger enclosure that “could be used by a tiger to escape through the top of the enclosure.”
- An insecure tiger enclosure that prompted the inspector to write, “The [tigers] could easily enter the visitor area at this time.”
- A macaque was found dead and the owner and vet theorized that the animal had been electrocuted as evidenced by a partially chewed and unplugged heat lamp cord.
- An Arctic fox enclosure located outside of the perimeter fence, resulting in the escape of the foxes from the facility.
- 10 veterinary care violations, such as failure to provide veterinary care to two rabbits with protruding spines and hipbones who may have gone without adequate food and water; a matted Angora rabbit; a rabbit whose overgrown nails were curling around the pen wire; a goat with overgrown hooves; two goats who were limping; and failure to have a program of veterinary care.
- Eight violations related to feeding and watering, such as unsanitary feeding practices; failure to provide animals with sufficient food; failure to provide a veterinary-approved diet to big cats whose current diet may have been nutritionally deficient; and dirty drinking water.
- 27 violations for failure to properly clean and sanitize enclosures, many of which had an excessive accumulation of feces, and improper waste disposal. Candy would rather be charged with repeated violations of unsanitary conditions than modify the cleaning routine at his facility.
- Failure to provide minimum space to two large macaques who were in cages that did not allow them to comfortably turn and make other normal adjustments and to a juvenile lemur who was in a cage that provided only 2.6 square feet of space.
- 10 violations for failure to keep the premises free of clutter, filth, and debris.
- Six violations for failure to have a sufficient number of adequately trained employees.
- Six violations for failure to provide adequate shelter from sunlight and inclement weather.
- Seven violations for failure to maintain the perimeter fence, which serves to restrict animals and unauthorized persons from accessing animals and functions as a secondary containment system in



An overweight white tiger with a skin condition at Tri-State Zoo.

the event of an escape.

- Seven violations for infestations of rodents, roaches, and flies.
- Repeated failure to provide an adequate environmental enrichment plan to promote the psychological well-being of primates.
- Repeated failure to provide proper drainage, prompting the inspector to write on more than one occasion, "This facility is one giant puddle."

The HSUS Inspection Summary

During a visit by The HSUS experts, Tri-State Zoo was extremely cluttered, disorganized, and had poor sanitation practices. Areas were crumbling, overgrown with weeds, and it appeared that many structures were shoddily constructed from nothing more than scraps of various materials. There was no evidence of a clean water source for most animals. There was days and weeks' worth of feces in almost all enclosures. The environments were impoverished and lacked correct or clean substrates, secure climbing structures, and resting platforms. The owner initially claimed that all the animals at the zoo were rescued, but later described acquiring newborn animals from breeders, animals who were born at the zoo, and intentions for further breeding of animals. This facility lacks resources to properly care for the animals currently on the premises and should not be breeding or otherwise acquiring additional animals.

Fiscally irresponsible facilities that cannot afford to hire qualified, professionally-trained staff and acquires numerous dangerous species, such as Tri-State Zoo, not only sacrifice animal welfare and potentially endanger communities, they can become a burden to taxpayers. There have been numerous cases of privately-run menageries that have run out of funds and closed after collecting many exotic animals, leaving local, state, and/or federal officials—as well as the sanctuary community—to clean up the mess.



A Himalayan black bear at Tri-State Zoo lacks a stimulating environment.

Bears

The cage was too small for the two Himalayan black bears at Tri-State Zoo and there were no climbing structures, no evidence of enrichment, and there appeared to be inadequate shelter, raising similar animal welfare concerns as the bear enclosures at the other two Maryland roadside zoos.

Big Cats

Instead of professional caretakers, Tri-State Zoo is maintained exclusively by owner Robert Candy and volunteers who have received little to no formal training, yet this facility has more big cats than any other accredited or unaccredited zoo in Maryland and the owner stated intentions to breed more.⁷⁵

Ronald Tilson, Ph.D., senior conservation advisor at the Minnesota Zoo Foundation expressed alarm after reviewing photos of the tiger cages at Maryland's roadside zoos. Tilson has been a longtime member of the AZA's Felid

Taxon Advisory Group, served as the director of conservation for the Minnesota Zoo for 21 years, coordinated the AZA Tiger Species Survival Plan, and has published over 300 scientific articles and testified in animal trafficking trials as a tiger expert. Having conducted inspections of privately-run big cat facilities at the request of state law enforcement, Tilson is all too familiar with the inadequate conditions prevalent at roadside zoos and warned, "Tigers are



Most of the containment structures for the tigers at Tri-State Zoo appeared insufficient in both strength and design.

large, dangerous animals that can easily cause injury or death to other animals or humans. In the United States, the probability that fatal attacks or injuries will occur is highest in situations where tigers are kept in private possession, whether as household pets or in private 'roadside zoos.' In addition to the risk of harm to owners and others coming in contact with them, as well as the surrounding community, the tigers themselves often do not receive adequate health care, nutrition, or freedom to exercise, and may be exposed to unnecessary surgical procedures, such as declawing."

One Tri-State Zoo volunteer who allowed small children and other members of the public to come dangerously close to three 14-month old tigers and a lion during a behind-the-scenes tour testified before a USDA Administrative Law Judge that he was instructed that if an animal escapes, he should do "whatever you can to keep the animal from getting away."⁷⁶

In contrast, Tilson wrote, "AZA standards dictate that all staff working with tigers should receive thorough training. All emergency safety procedures must be clearly written, provided to appropriate staff and volunteers, and readily available for reference in the event of an actual emergency. Emergency drills are conducted at least once annually for each basic type of emergency. Personnel authorized to utilize firearms for emergency containment of tigers are expected to have professional training and regular practice. All capture equipment must be in good working order and available to authorized and trained animal care staff at all times."

"Plumpton Park Zoo, Catoclin Zoo, and Tri-State Zoo ... are grossly substandard and raise serious concerns about public safety."

Ronald Tilson, Ph.D., senior conservation advisor at the Minnesota Zoo Foundation

Most of the containment structures for the tigers at Tri-State Zoo appeared insufficient in both strength and design when Farinato and Dr. Richardson visited. The tigers were kept in a pit in that was once a



Keeping large, powerful predators is best left to professionals to prevent private menageries from keeping tigers in a deteriorating empty pool, such as this tiger at Tri-State Zoo.

swimming pool. Rope netting was draped along and from the visitor observation platform. This netting had several broken areas. If a tiger were able to leap high enough to reach the netting or if the netting were to droop or partially fall, it could entangle a tiger or provide a climbing structure for the tiger to escape from the cage. The walls along the exterior rim of the pool and in the divider between tigers were cobbled together with wood, cattle panels, and other wire types.

The tigers had inadequate elevated resting platforms, no obvious source of drinking water, the water in the small pools appeared to be filthy, there was inadequate shelter, and the enclosure flooring was in disrepair. The white tiger was overweight and had skin lesions consistent with allergic contact dermatitis, as well as areas of alopecia with blackened skin.

Tilson stated, “Plumpton Park Zoo, Catoctin Zoo, and Tri-State Zoo ... are grossly substandard and raise serious concerns about public safety. It is highly unlikely that staff is properly trained to prevent dangerous incidents or handle emergencies. The cages lack the size and complexity sufficient to provide for the animal's physical, social, and psychological well-being.”

According to Tilson, to promote animal welfare and public safety, all tiger exhibits should include relatively large, complex outdoor space with large water pools at least three-feet deep, moats, and/or running streams. Exhibit design, enclosure features, and enrichment should provide opportunities for tigers to express natural behaviors such as scratching, running, jumping, climbing, stalking, chasing, pouncing, scent marking, swimming, and resting. Tigers benefit from enclosures with live vegetation and natural soil substrates and each exhibit should have elevated platforms that are large enough to accommodate all animals simultaneously. Providing logs or timbers promotes natural behaviors such as territory marking and scratching, which helps with claw wear and maintenance. The same careful consideration regarding exhibit size and complexity must be given to the design and size of all enclosures, including those used in holding areas.

Tilson concludes, “In the interest of safety and animal welfare, the tiger enclosures at Maryland's roadside zoos should be closed down or phased out. In addition, legislation limiting the care and handling of tigers to the skilled professionals at AZA-accredited institutions would go a long way in reducing the serious safety risks posed by captive tigers in the private sector and ensure their humane treatment.”

Primates

Of particular concern, there was no staff present when The HSUS experts arrived at Tri-State Zoo and they were able to access the petting zoo area where the lemur and macaque cages were located. A lack of appropriate enrichment and a buildup of feces on resting surfaces were evident in these cages. The capuchin was singly-housed and lacked appropriate enrichment and cage features. The indoor area of the squirrel monkey cage contained filthy glass and walls.



The capuchin monkey at Tri-State Zoo was housed alone and the cage lacked appropriate enrichment and furnishings.

Complaints from the Public

Tri-State Zoo does not attract many visitors (the owner estimates approximately 3,000 visitors annually), so there are very few online reviews, but one Yelp reviewer had this to say:^{77,78}

★ ★ ★ ★ ★ 8/9/2011

The conditions that these animals are subjected to are simply deplorable. Feces and rotting carcasses litter the cages. I understand they had a large fire not too long ago, but the zoo ought to be shut down. Only 2 staff members on the property and it took less than 30 minutes to exhaust all entertainment from this wretched site. Seriously thinking about contacting animal rescue on this one.

Also, there is a box labeled "Meat Donations Only" in the parking lot...

Other Animals Could Benefit from a Stronger State Law

Illustrated in this section are a few of the many other problems observed by The HSUS experts during site visits to Catoctin Zoo, Plumpton Park Zoo, and Tri-State Zoo. Limiting the possession of big cats, bears, and primates to AZA-accredited institutions would allow these roadside zoos to focus on improving conditions for the other species in their care, such as the following issues observed in September 2013.



The two semi-aquatic capybaras with red, irritated skin at Catoctin are in need of a pool.



Reptile cages at Catoctin are in need of clean water.



The bent, rusty portion of the fencing for Catocin's dingo cage needs to be replaced.



Meerkats are known for their sunbathing, but the meerkat cage at Catocin was inside a dark building with no natural light.



The raccoon at Catocin had no outdoor area and the housing structure was dark, poorly ventilated, dirty, and dusty.



Catocin staff needs to clean the filthy Amazon parrot cage, which probably had not been cleaned in at least six months.



The wolves at Catocin, including this one with a large raw wound, need a much larger enclosure and more privacy areas for a wolf to retreat to in the event of conflict.



Catocin staff needs to clean the many cobwebs and other unsanitary conditions found at the zoo.



The two arctic foxes at Plumpton Park need a bigger cage with privacy areas and a properly constructed door to ensure the animals are safely contained.



The foul-smelling jackal cage at Plumpton Park needs cleaning, enlargement, and privacy areas and the buckled, exposed chain link flooring needs to be replaced to prevent a jackal from getting a paw or leg stuck.



Plumpton Park staff need to clean the filthy cage for the blue and gold macaw, which has not been cleaned in weeks.



The alligator tub at Plumpton Park was was much too small, had dirty water, and was not deep enough. The alligator could potentially access the two heat lamps above the tub.



The foul-smelling concrete serval cage at Plumpton Park needs to be replaced with a larger enclosure that offers privacy areas and a softer, natural substrate.



The cage size was inadequate for the Burmese python at Plumpton Park. In addition, the cage design was extremely dangerous, with no way to safely remove the snake and the cage had not been cleaned for several weeks or months.



Plumpton Park needs to ensure the giraffe receives careful and routine nail trimming, including for the nail growing inwards on the left front foot, to prevent lameness or injury.



Plumpton Park needs an electrician to replace the extension cords haphazardly strung about fencing, cages, and trees with permanent wiring.



Tri-State staff need to clean the filthy coatimundi cage which had an excessive accumulation of feces.



Tri-State needs to repair the broken base of the skunk enclosure that had pieces of missing and broken wood.



Tri-State needs to construct aviaries to eliminate the extreme overcrowding of the caged birds.



Tri-State staff needs to clean the dozens of extremely filthy bird cages.



Tri-State staff needs to clean the filthy reptile cages and provide the animals with clean water.



Tri-State needs to ensure safe containment of the boa constrictor kept in a cage with one side constructed of wire gauge fencing, which could allow the snake to escape.



The cage for the New Guinea singing dog at Tri-State was smaller than the backyards most people provide for their domestic dogs and the cage lacked enrichment.



Tri-State needs to clean up the cluttered premises and repair crumbling areas.

Conclusion

The experts HSUS commissioned to visit these Maryland roadside zoos found sad, bored animals living in unacceptable and potentially dangerous conditions. Many of these animals are long-lived species that require expensive, specialized care by competent staff, yet roadside zoos without adequate resources are breeding and acquiring more animals, including dangerous species.

Exempting “an exhibitor licensed under the federal Animal Welfare Act” from Maryland’s law that prohibits

the possession of certain dangerous species is overly broad. If Maryland law limited the USDA exhibitor exemption to AZA-accredited zoos and aquariums and GFAS-accredited sanctuaries, it would make certain that only qualified, professionally-run facilities with the knowledge, experience, and resources are allowed to possess bears, big cats, and primates—species that can cause death, inflict serious and catastrophic injury, and spread deadly diseases.

As clearly demonstrated in this report, the blanket USDA exemption in Maryland law defeats the purpose of an otherwise strong law. Removing the USDA loophole for bears, big cats, and primates is a necessary, common-sense approach to ensure the welfare of animals and the safety of humans, and spares taxpayers and nonprofit organizations the burden of paying costs related to escapes, attacks, and neglect cases involving these species.

If existing animals were grandfathered in to the law, unaccredited and substandard exhibitors that currently have these animals could keep them for the remainder of their lives, but breeding and new acquisitions of bears, big cats, and primates would be prohibited.

Footnotes and References

*The term roadside zoo generally applies to a privately-owned tourist attraction that keeps animals in substandard conditions and often allows visitors direct or close contact with animals, including dangerous species.

**Statistics from an analysis of The HSUS' database of dangerous incidents compiled from news articles, police reports, inspections reports, and similar sources, data pulled November 13, 2013. Dangerous incidents occurring at non-AZA facilities are less likely to be reported, so actual percentages of injuries and escapes at non-AZA facilities are likely higher than the numbers in this report.

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