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May 25, 2017

Elizabeth Goldentyer, D.V.M.
Director, Animal Welfare Operations
USDA/APHIS/AC Eastern Region
920 Main Campus Dr., Ste. 200
Raleigh, NC 27606

Via UPS and e-mail: [REDACTED] aceast@aphis.usda.gov

Re: Request for Investigation of Apparent Animal Welfare Act Violations at
Deer Haven Mini Zoo (License No. 51-C-0111)

Dear Dr. Goldentyer:

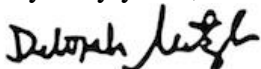
I am writing on behalf of PETA to request that the U.S. Department of Agriculture (USDA) promptly investigate Deer Haven Mini Zoo ("Deer Haven"; license no. 51-C-0111) for the following apparent Animal Welfare Act (AWA) violations, observed and documented by Dr. Heather Rally and me on May 17 and described in the attached appendix:

- A pig had overgrown hooves. (*See Video 1.*)
- An Arctic fox was seen biting him- or herself, indicating skin and/or hair irritation. (*See Video 2.*)
- Lemurs had red, irritated skin at the base of their tails. (*See Video 3.*)
- A coatimundi had patchy hair loss on his or her hind. (*See Video 4.*)
- A bobcat was observed and documented continuously pacing, a sign of psychological distress. (*See Video 5.*)
- There was no supervision of direct public contact and feeding of animals. (*See Video 6 and Video 7.*)

Please ensure that all the animals at Deer Haven are provided with adequate veterinary care, shelter, food, and water and are otherwise handled in accordance with the AWA. Please hold the facility fully accountable for any violations that your investigation reveals.

Thank you for your attention to this important matter. Please inform me of the complaint number that your agency assigns to this correspondence.

Very truly yours,



Deborah Metzler, M.S.
Wildlife Specialist, Captive Animal Law Enforcement
[REDACTED]

Appendix

a. Pig With Overgrown Hooves

Dr. Rally and I observed and documented that a pig had overgrown hooves. (See Video 1.) PETA previously reported that this pig had overgrown hooves on September 8, 2016. (See Complaint No. AC17-041.) In the USDA's inspection report of Deer Haven dated January 19, 2017, it was noted that the pig's overgrown hooves had been trimmed. However, it appears that this is a persistent and recurring issue.

Hooves require regular corrective trimming, and inadequate maintenance can lead to serious welfare problems such as lameness, joint problems, tripping, and painful infections. This pig was noticeably reluctant to walk, even when presented with food. This animal should be placed on an appropriate therapeutic plan to correct his or her overgrown hooves. Please inspect this pig and all the hooved animals at Deer Haven, as well as their veterinary records, and ensure that they are receiving adequate veterinary care and hoof maintenance pursuant to 9 C.F.R. § 2.40.

b. Animals With Skin Irritation and Hair Loss

Dr. Rally and I observed and documented that a white Arctic fox was continuously biting him- or herself in a manner that indicated skin irritation. (See Video 2.) PETA previously reported that this fox showed signs of thinning hair and likely uncomfortable skin irritation after he or she was observed continuously scratching on September 8, 2016. (See Complaint No. AC17-041.) On October 12, 2016, the USDA cited Deer Haven for failing to provide adequate veterinary care to an Arctic fox whose winter coat growth was slower than expected for normal development. Inspection reports from January 19, January 31, and March 6 state that the animal *still* had not been evaluated by a veterinarian in accordance with 9 C.F.R. § 2.40(b)(2). We suspect that this is the same animal, and this condition appears to remain uncorrected.

We also observed and documented that two lemurs had red, irritated skin at the base of their tails. (See Video 3. The redness can be appreciated at 0:14 for the lemur on the left and at 0:16 for the lemur on the right.) Both lemurs appeared to rest the affected areas on 2-foot-by-4-foot posts, indicating that the posts may be causing some kind of irritation. The enclosure should be evaluated to ensure that perches and structures do not cause discomfort or irritation for the animals.

A coatimundi was also observed to have patchy hair loss on his or her rump and hind legs. (See Video 4.)

Thinning hair and skin conditions can be indicative of systemic pathology, parasites, or infection and may be itchy and painful. Additionally, the conditions could be a result of chronic irritation because of inadequate enclosure conditions or self-inflicted because of excess rubbing on unnatural surfaces. These animals, and their veterinary records, should be evaluated by a veterinarian for diagnostic workup and appropriate treatment of their conditions. Please ensure that these animals are receiving adequate veterinary care pursuant to 9 C.F.R. § 2.40.

c. Bobcat Exhibiting Signs of Psychological Distress

Dr. Rally and I observed and documented that a bobcat continuously paced in the rafters of his or her enclosure. (See Video 5.) The USDA cited Deer Haven on October 12, 2016, for failing to provide this animal with adequate veterinary care, stating that "[a]bnormal behavior patterns can be indicative of physical or psychological issues that may require medical treatment or

habitat/husbandry modification and must be evaluated promptly by the attending veterinarian in order to receive appropriate treatment and management." Inspection reports from January 19, January 31, and March 6 indicate that this animal *still* had not been evaluated by a veterinarian in accordance with 9 C.F.R. § 2.40(b)(2). The bobcat continues to exhibit abnormal behavior and is still suffering from apparent psychological distress.

In addition to a persistent failure to provide this animal with adequate veterinary care, the enclosure in which he or she is confined apparently fails to provide him or her with adequate space or adequate enclosure complexity with opportunities for normal postural behavior. Pursuant to 9 C.F.R. § 3.128, "[e]nclosures 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. Inadequate space may be indicated by evidence of ... stress, or abnormal behavior patterns." In the wild, bobcats are naturally predatory animals who travel vast distances to find prey, and their stereotypic pacing—an "abnormal behavior pattern"—is a sign of stress. The repetitive stereotypical pacing of this bobcat indicates that Deer Haven is not exhibiting this animal "in a manner that does not cause ... behavioral stress ... or unnecessary discomfort" or "under conditions consistent with their good health and well-being," in apparent violation of 9 C.F.R. § 2.131(b)(1) and (d)(1).

Please inspect the bobcat, as well as his or her veterinary records, and ensure that he or she is receiving adequate veterinary care pursuant to 9 C.F.R. § 2.40.

d. Unsupervised Public Contact and Feeding

When Dr. Rally and I first entered Deer Haven, we didn't see any workers or attendants present. We placed our admission in a box below a sign that read, "Please pay here." Directly under the payment box was another sign that read, "If unattended please use box at counter," implying that this is a frequent occurrence. (*See Photo below.*) After several minutes, a worker greeted us and told us that we could look around but that she was working in other areas of the facility. We did not see her again the rest of the time that we were at the facility. We were able to have unsupervised contact with many of the animals, including a pig, alpacas, rabbits, guinea pigs, goats, sheep, and a squirrel (*see Video 6*), as well as several species of birds, including emus, who are known to be dangerous. A bucket of feed was located in the admission office, and I was able to feed a handful of this to the pig, though I could've easily fed it directly to any of the animals listed above. (*See Video 7.*)

Allowing unsupervised direct public contact and feeding is in apparent violation of 9 C.F.R. § 2.131(c)(1) and (d)(2), requiring that, respectively, "[d]uring public exhibition, any animal must be handled so there is minimal risk of harm to the animal and to the public, with sufficient distance and/or barriers between the animal and the general viewing public so as to assure the safety of animals and the public," and "[a] responsible, knowledgeable, and readily identifiable employee or attendant must be present *at all times* during periods of public contact" [*emphasis added*].

The limited oversight also suggests that Deer Haven may not be operating with an adequate number of employees, in apparent violation of 9 C.F.R. § 3.132, requiring that "[a] sufficient number of adequately trained employees shall be utilized to maintain the professionally acceptable level of husbandry practices." The USDA has repeatedly cited Deer Haven for failing to maintain an adequate number of employees, including on the last five publicly available inspection reports for routine inspections: August 29, 2016; October 12, 2016; January 19, 2017; January 31, 2017; and March 6, 2017. This violation appears to remain uncorrected.



Photo: Signs above and below the admission box indicate that Deer Haven is often unattended.