AN INTERNATIONAL ORGANIZATION DEDICATED TO PROTECTING THE RIGHTS OF ALL ANIMALS

PETA FOUNDATION

PEOPLE FOR THE ETHICAL TREATMENT OF ANIMALS FOUNDATION

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July 15, 2025

USDA/APHIS/Animal Care

Via e-mail: ac.complaints@usda.gov

Re: Request to Investigate Apparent Animal Welfare Act Violations at Exotic Animal Encounter, dba Debbie Dolittle's Petting Zoo (License No. 91-C-0160)

Dear USDA Animal Care:

I am writing on behalf of PETA to request that the U.S. Department of Agriculture promptly investigate Exotic Animal Encounter, dba Debbie Dolittle's Petting Zoo (license number 91-C-0160) for the following apparent Animal Welfare Act (AWA) violations—detailed in the attached appendix—which I documented first-hand on July 7, 2025.

- A capybara had dry skin and lacked an adequate swimming pool. (*See* Photo 1, Video 1 and Video 2.)
- A donkey and a capybara exhibited abnormal repetitive behaviors, indicative of psychological distress. (*See* Video 3, Video 4 and Video 5.)
- Enclosures showed signs of chewing and disrepair (*See* Photos 2-4.)
- Unsafe Binturong feeding, posing a risk of dangerous public contact. (*See* Video 6.)
- Exposed electrical outlets in a kangaroo and wallaby enclosure. (*See* Photo 5.)

Please ensure that these animals and all others at Debbie Dolittle's Petting Zoo are provided with adequate veterinary care, space, shelter, food, and water, and are otherwise handled in accordance with the AWA. Please hold the licensee and any other responsible parties fully accountable for all violations that you discover during your inspection.

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,

Debbie Metzler

Debbie Metzler, M.S.
Senior Director of Captive Wildlife
[redacted]

## Appendix

### a. A Capybara Had Dry Skin and All Capybaras Lacked an Adequate Swimming Pool

I observed and documented a female capybara who had dry skin and lacked an adequate swimming pool for submerging. (*See* Photo 1 and Video 1.) Wildlife Veterinarian Dr. Mason Payne opined that the skin appeared flaky and dry, which is likely from a dry environment and a lack of adequate swimming areas. Capybaras regularly fully submerge in water and are usually found near water, so a lack of the ability to do so in captivity can lead to dry, itchy skin and even result in wounds if not resolved. Debbie Dolittle's Petting Zoo does not appear to be providing this animal with sufficient space to engage in species-typical behaviors, in apparent violation of 9 C.F.R. § 3.128, which states that "[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 malnutrition, poor condition, debility, stress, or abnormal behavior patterns." Moreover, the USDA has noted that "Capybaras are a semi-aquatic species and having access to a pool provides the ability for normal and postural adjustments with adequate freedom of movement, including the ability to swim. This aspect of their enclosure needs to be addressed for the overall health of the animals."[1]

In addition to the lack of any pool for the capybaras confined to the indoor area, I also witnessed that outside the facility, an isolated capybara was confined to an enclosure that although contained a small tank of water apparently intended for swimming—appeared to be inaccessible to the capybara. A piece of discarded pallet wood was leaning against the tank at an angle that was too steep for the capybara to easily climb and enter the pool. (*See* Video 2.) Indeed, after informing a worker that she had dumped her entire bucket of drinking water over herself, I was told that she does that "all the time" as the worker expressed annoyance that the animal never even goes into the pool that is inside the enclosure. It was clear to me that this was because the animal was *unable* to enter the pool, not unwilling. According to USDA Guidelines, semi aquatic animals like capybaras "need access to pools that are large enough and deep enough for each animal to fully submerge. Another good feature is a gradual or sloped, non-slip entry to the pool. This gives animals an easy and comfortable way to enter and exit the pool."[2]

Note that the USDA *twice* cited Debbie Dolittle's Petting Zoo for failing to provide penguins with a pool of adequate surface area and depth to allow the animals to "make normal postural and social adjustments, such as immersion, bathing, swimming, and foraging with adequate freedom of movement."[3] Given the facility's history of noncompliance with this issue, it should be well aware of its obligation to provide semi-aquatic animals with adequate enclosures. Please also inspect these animals and their veterinary records to ensure that they are receiving adequate veterinary care pursuant to 9 C.F.R. § 2.40.

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[1] *See* USDA Inspection Report, Taylor's Wild Enterprises, license number 21-C-0499, December 5, 2023.
[2] *See* USDA Guidelines, Animal Care Aid, Semi-Aquatic Animals, February 2024.
[3] USDA Inspection Reports, Exotic Animal Encounter DBA Debbie Dolittle's Petting Zoo, license number 91-C-0160, Apr. 19, 2024; USDA Inspection Reports, Exotic Animal Encounter DBA Debbie Dolittle's Petting Zoo, license number 91-C-0160, Feb. 14, 2024

**b. A Donkey And A Capybara Were Exhibiting Abnormal Repetitive Behaviors, Indicative of Stress.**

I observed and documented a donkey who was pacing. (*See* Video 3.) I also observed the donkey and a capybara chewing on their exhibit walls. (*See* Video 4 and Video 5.) The areas where the animals were chewing showed signs of wear and damage, indicating that the chewing has been happening for some time. This abnormal behavior pattern may indicate behavioral frustration and psychological distress and is likely caused by a number of environmental factors, including insufficient space and environmental complexity and a lack of species appropriate sensory stimulation that contributes to the lack of opportunities to engage in species-specific behaviors, suggesting that these animals have poor welfare and are suffering.[4]

The abnormal behaviors exhibited by these animals is a sign that Debbie Dolittle's Petting Zoo is failing to exhibit them "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). Moreover, the licensee does not appear to be providing these animals with sufficient space to engage in species-typical behaviors as indicated by their abnormal behaviors, in apparent violation of 9 C.F.R. § 3.128.

Wood chewing may also indicate underlying nutritional deficiencies or lack of an adequate quantity of feed, and providing grazing animals such as these with regular and plentiful feeding opportunities seems to help eliminate wood chewing behavior. Please also ensure that they are receiving an adequate diet pursuant to 9 C.F.R. § 3.129(a), which states in part "[t]he food shall be wholesome, palatable, and free from contamination and of sufficient quantity and nutritive value to maintain all animals in good health."

Abnormal behaviors may also indicate underlying medical conditions, and require veterinary evaluation to receive appropriate treatment and management as previously noted by the USDA.[5] Please inspect these animals and their veterinary records, and ensure that they are receiving adequate veterinary care pursuant to 9 C.F.R. § 2.40.

**c. Chewed Wooden Surfaces Pose Health and Safety Risks to Animals**

I observed multiple enclosures that had chewed on wooden surfaces, posing an injury risk. The donkey and a capybara chewed on their exhibit walls and other areas accessible to animals showed evidence of chewing or damage. (*See* Photos 2-4.) 9 C.F.R. § 3.125(a) requires housing facilities to be kept in good repair as "failure to maintain housing facilities in good repair can affect the structural integrity of the enclosures which may lead to the injury or escape of the animals contained in them. Broken and torn enclosure [*sic*] may also have rough or sharp edges which can also lead to injury of the animal."[6] If wood particles are ingested, they could potentially cause an obstruction or other injury to the gastrointestinal tract.

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[4] G.J. Mason, "Stereotypies and Suffering," *Behavioural Processes* 25 (1991): 103–104; R.R. Swaisgood and D.J. Shepherdson, "Scientific Approaches to Enrichment and Stereotypies in Zoo Animals: What's Been Done and Where Should We Go Next?" *Zoo Biology* 24 (2005): 499–518.

[5] *See* USDA Inspection Reports, Kathleen M. Futrell, dba Waccatee, license number 56-C-0230, May 9, 2017; and Denver Zoological Foundation, license number 84-C-0002, March 27, 2017.

[6] *See* USDA Inspection Reports, Kay Rosaire and Clayton Rosaire Mowrey, license number 58-C-1030, July 9, 2024.

The USDA previously cited Debbie Dolittle's Petting Zoo for keeping enclosures in disrepair.[7] Please inspect Debbie Dolittle's Petting Zoo to ensure that facilities are properly maintained and that enclosures are adequately repaired.

**c. Unsafe Binturong Feeding, Posing a Risk of Dangerous Public Contact**

I observed and documented unsafe binturong feeding by an employee, which posed a risk of the animal escaping from the primary enclosure. (*See* Video 6.) The employee entered the primary binturong area, leaving the gate open, allowing the binturong to easily access the secondary public barrier area, which posed a safety risk for the binturong and the public. A child ran up to the fencing and grabbed the cage that was for all intents and purposes the primary enclosure since the separation gate had been left open. If the binturong had entered the secondary containment area, that child could have had dangerous direct contact with the binturong. It appeared that this dangerous procedure is a routine practice at the facility.

It appears Debbie Dolittle's Petting Zoo is exhibiting this binturong in a manner that violates 9 C.F.R. § 2.131(c)(1), which requires that "during 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."

Additionally, please ensure that the licensee has trained employees according to 9 C.F.R. § 3.132, which states that "a sufficient number of adequately trained employees shall be utilized to maintain the professionally acceptable level of husbandry practices set forth in this subpart. Such practices shall be under a supervisor who has a background in animal care."

Please also inspect this animal and her veterinary records to ensure that she is receiving adequate veterinary care pursuant to 9 C.F.R. § 2.40.

**d. Exposed Electrical Outlets In A Kangaroo and Wallaby Enclosure.**

I observed and documented exposed electrical outlets in a kangaroo and wallaby enclosure, which poses a safety risk. (*See* Photo 5.) Electrical outlets may cause harm to the animals if they are chewed on, licked or pulled on. The USDA has previously cited Chestatee Wildlife Preserve for this same issue.[8]

Please ensure that Debbie Dolittle's Petting Zoo is protecting these animals from injury in accordance to 9 C.F.R. § 3.125(a), which states "the indoor and outdoor housing facilities shall be structurally sound and shall be maintained in good repair to protect the animals from injury and to contain the animals."

[7] USDA Inspection Reports, Exotic Animal Encounter DBA Debbie Dolittle's Petting Zoo, license number 91-C-0160, Nov. 18, 2024.
[8] *See* USDA Inspection Report, Chestatee Wildlife Preserve Inc., license number 57-C-0325, January 24, 2023 and December 5, 2023.