Due Diligence Report
Options for Chai and Bamboo
Index

About Zoocheck 3

Fundamental Differences Between Zoos and Sanctuaries 4 - 6

Criteria Used in Review of Facilities for Elephants 7 – 8

Quick Reference Chart of AZA Zoo Elephant Exhibits 9

Elephant Facilities Accredited by the Global Federation of Animal Sanctuaries
   PAWS Sanctuary 10
   Tennessee Elephant Sanctuary 11

Elephant Exhibits at Zoos Accredited by the Association of Zoos and Aquariums

Albuquerque Zoo Elephant Exhibit 12
Audubon Zoo 13
Bronx Zoo 14
Buffalo Zoo 15
Busch Gardens Theme Park 16
Buttonwood Zoo 17
Chaffee Park Zoo 18
Cincinnati Zoo 19
Columbus Zoo 20
Denver Zoo 21
Dickerson Park Zoo 22
El Paso Zoo 23
Fort Worth Zoo 24
Honolulu Zoo 25
Houston Zoo 26
Little Rock Zoo 27
Los Angeles 28
Louisville Zoo 29
National Elephant Centre (not yet accredited) 30
Oklahoma Zoo 31
Elephant Exhibits at Zoos Accredited by the Association of Zoos and Aquariums

<table>
<thead>
<tr>
<th>Zoo</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Phoenix Zoo</td>
<td>33</td>
</tr>
<tr>
<td>Point Defiance Zoo</td>
<td>34</td>
</tr>
<tr>
<td>Rosamond Gifford Zoo</td>
<td>35</td>
</tr>
<tr>
<td>San Antonio Zoo</td>
<td>36</td>
</tr>
<tr>
<td>San Diego Zoo</td>
<td>37</td>
</tr>
<tr>
<td>Santa Barbara Zoo</td>
<td>38</td>
</tr>
<tr>
<td>Smithsonian National Zoo</td>
<td>39</td>
</tr>
<tr>
<td>St. Louis Zoo</td>
<td>40</td>
</tr>
<tr>
<td>Topeka Zoo</td>
<td>41</td>
</tr>
<tr>
<td>Tulsa Zoo</td>
<td>42</td>
</tr>
<tr>
<td>Zoo Miami</td>
<td>43</td>
</tr>
<tr>
<td>Climate Map for North America</td>
<td>44</td>
</tr>
</tbody>
</table>
About Zoocheck

Zoocheck is an international wildlife protection 501c3 organization established in 1984 to promote and protect the interests and well-being of wild animals. Zoocheck specializes in issues regarding the keeping of wildlife in captivity. The organization’s goals are accomplished through investigation and research, public education and awareness campaigns, capacity building initiatives, legislative actions and litigation.

During the past 30 years Zoocheck staff and representatives have inspected or attended more than 1,000 zoos, sanctuaries, rescue centers, conservation breeding facilities and other similar kinds of wildlife in captivity facilities around the world. Zoocheck is regularly consulted by individuals, organizations and agencies looking for assistance in the assessment of captive wild animal housing and husbandry conditions.

Zoocheck endeavors to work cooperatively with governmental agencies to develop stronger laws for wild and exotic animals and has worked with numerous zoos and sanctuaries to improve facilities and enhance animal welfare. Zoocheck has relocated or assisted in the relocation of numerous animals, including monkeys, wild cats and elephants, from facilities that were unable to provide conditions that satisfied the biological and behavioral requirements of those animals.

In 2012 and 2013, Zoocheck provided substantive assistance to Toronto City Council by providing information, expertise and resources relevant to their due diligence process in assessing the best facility for the three Toronto Zoo elephants. Zoocheck then facilitated the successful transfer of the elephants to the Performing Animal Welfare Society (PAWS) sanctuary in California.

Zoocheck endeavors to promote animal protection in specific situations and strives to bring about a new respect for all living things and the world in which they live.
Fundamental Differences between Zoos and Sanctuaries and Seattle Resident Values

In order to make an informed decision regarding the retirement of Chai and Bamboo, it is prudent to compare the missions and goals of the institutions being considered to ensure the decisions made reflect those of Seattle residents who have funded the zoo and remain invested in the best interests of the animals.

**Zoo mission and goals** – According to their website, the Association of Zoos and Aquariums (AZA) is a nonprofit 501c(3) organization dedicated to the advancement of zoos and aquariums in the areas of conservation, education, science, and recreation. Animal welfare is not stated to be a primary goal. The health and welfare of captive animals is a public concern and therefore zoos must reflect this concern; however, it is a subsidiary interest to their primary goals of conservation, education, science and recreation.

In the case of elephants, North American zoos have historically housed elephants in very small enclosures in which they are unable to engage in a full range of species-typical movements and behaviors. The reasons for this are complex, but can include a lack of sufficient zoo space making it impossible to provide large enclosures and the belief that visitors should have an unfettered opportunity to view elephants. Lack of space and resources, attempts to satisfy the expectations of zoo visitors, along with other factors, such as the belief that elephants should be breeding, can conflict with the well-being of animals, resulting in lower levels of welfare. If animal welfare was a stated goal, we suggest that the conditions experienced by elephants in many zoos would be substantially different than they currently are.

**Sanctuary mission and goals** – The sole aim of sanctuaries is to support the health and welfare of the animals in their care. The Global Federation of Animal Sanctuaries (GFAS) certifies animal sanctuaries, rescue centers and rehabilitation centers around the world to ensure they are providing the best possible animal welfare conditions. Unlike in zoos, animal welfare is stated to be a primary interest of sanctuaries and is unfettered by concerns about visitor expectations and breeding.

Since a primary goal of sanctuaries is animal welfare, they aim to provide conditions that enable animals to engage in species-typical movements and behaviors and to experience enhanced welfare. In the case of elephants, this is accomplished through the provision of substantially larger elephant enclosures than zoos are able to provide, living vegetation (including pasture) so elephants can graze naturally, a range of other natural features and an ability for elephants to make choices about where and with whom they spend their time. Because animal well-being is a primary goal, sanctuaries do
not rely on, potentially intrusive, public viewing or small enclosures to facilitate educational programming. Instead, they utilize other innovative strategies and tools to accomplish their education goals.

**Elephant retirement is different than transfer to another zoo** – Chai and Bamboo are no longer considered good candidates for breeding, due to their age and the number of unsuccessful breeding attempts at the Woodland Park Zoo. Since both zoos and sanctuaries deliver public education programming, the decision about where best to retire Chai and Bamboo should be based on which potential recipient facility can best meet their biological and behavioral needs and support their good health and welfare.

**Moving elephants is highly politicized** – GFAS does not engage in political campaigns aimed at pressuring institutions or individuals to transfer animals to their member sanctuaries. However, the AZA and the Elephant Managers Association (EMA) have actively discouraged zoos and elected officials seeking to relocate elephants to sanctuaries, by suggesting that only AZA accreditation can assure an acceptable standard of elephant care.

**AZA opposition to moving elephants to sanctuaries** – Two prime examples of the AZA actively discouraging member zoos from sending elephants to sanctuaries involve the Detroit Zoo and the Toronto Zoo. In each case, the AZA threatened to remove accreditation status if elephants were moved to a sanctuary rather than to an AZA member facility.

In the case of Detroit, the zoo’s CEO stood by his decision that a sanctuary was the best place for their aging elephants. The zoo did not lose their accreditation but AZA imposed other penalties and restrictions. Reportedly, none of these impacted Detroit Zoo visitor attendance and residents supported the decision to retire the elephants to the sanctuary.

In the City of Toronto elephant transfer debate, the AZA threatened to remove accreditation from the Toronto Zoo, claiming that the move contravened one of their policies. Both the AZA and their Canadian counterpart, CAZA, expressed opposition to moving the Toronto Zoo elephants to a sanctuary. Toronto City Councilors conducted their own due diligence process and consulted with world renowned elephant experts and scientists. Two Councilors also personally visited the PAWS sanctuary to inspect the facility for themselves prior to making their decisions. When erroneous claims were made about disease control at the sanctuary, Toronto City Council relied on a report from independent infectious disease specialists who inspected the sanctuary to assess its quarantine protocols and disease mitigation practices, rather than relying on zoo industry speculation and hyperbole. Toronto City Council voted on the elephant transfer issue on two separate occasions and
each time overwhelmingly supported sending the three Toronto Zoo elephants – Irina, Toka and Thika – to PAWS ARK 2000 in California.

AZA did revoke the Toronto Zoo’s accreditation status after the elephants were moved. Despite fear-mongering by zoo management about how loss of accreditation would detrimentally affect their operation, the Toronto Zoo has continued to trade animals for breeding and even acquired highly desired, endangered Giant Pandas after accreditation was removed.

The Toronto Zoo did damage its own reputation through their aggressive attempts to prevent the three elephants being sent to the sanctuary and, more than a year later, the media continues to report on the public’s loss of confidence in the zoo because of their actions during the elephant transfer debate.

**Zoo vs sanctuary standards** – The GFAS standards tend to be more detailed, objective and focused on animal biology and behavior, than some zoo standards are. They seek to make the accommodation and care fit the animal, rather than the animal fit the accommodation and care. Zoo standards can be less detailed and more aspirational in nature. Some of them focus on incremental improvements to existing conditions and the management of captivity-associated issues and disease. They may focus on the minutiae of management and attempt to address problems after they have surfaced. They do not generally seem to be rooted in the biology, behavior and lifestyles of animals in their wild state. In contrast, sanctuary standards focus on providing a healthy environment in which animals (including elephants) can express natural movements and behaviors and therefore maintain good physical and mental health.

**Progressive Seattle resident values** – Seattle is known as an extremely progressive City with residents who are well educated, environmentally aware and compassionate regarding animal welfare issues. Therefore, it is not surprising that professional polling regarding the fate of Chai and Bamboo shows that the vast majority of Seattle residents want them to go to a sanctuary that can provide a larger, more natural environment and which allows the elephants an opportunity to graze and make choices about how they wish to spend their time.

We encourage the City of Seattle to rely on the advice and direction of independent elephant experts and credible animal welfare agencies in deliberations regarding the fate of Chai and Bamboo. Doing so will help ensure that the politicized nature of elephant issues does not affect the best decision being made on their behalf. We expect Seattle residents would agree that the primary concern in this discussion is that Chai and Bamboo be retired to a facility that best meets their needs.
Criteria Used in Review of Accredited Facilities Housing Elephants

The following review of elephant keeping facilities, accredited by either GFAS or the AZA, considers space available to the animals, climate and management practices. While there are many other facets to captive elephant management, these three stand out as key factors that must be addressed in order for elephants to experience enhanced levels of welfare and quality of life. It should be noted that lack of space and inappropriate climates have been cited as factors in suffering and premature elephant mortality, while certain management practices have been cited as a cause of elephant abuse and human injury or death.

Elephants are highly active, wide-ranging animals that have evolved to live in warm climates. In the wild, elephants often walk long distances on a daily basis and engage in a vast array of other movements and behaviors. Elephants possess a variety of physical adaptations for walking, foraging and other activities but in captivity their ability to use many of these adaptations is restricted or eliminated.

The small elephant enclosures, common in many zoos, often preclude roaming, exploration activities and other movements and behaviors. Elephants are often housed on hard-packed, unyielding substrates, including hardpan earth and concrete, which can result in discomfort, foot infections and arthritis, leading to pain, restricted mobility, suffering and death. In fact, these conditions, which are rarely observed in wild elephants, have become the leading causes of early elephant mortality in captive facilities.

Inappropriate climates are an issue in many areas. Cold climates may force elephants to be confined indoors for days, weeks or months each year. This places additional burdens on elephants as their ability to move about is severely restricted and many normal behaviors are impossible to express. As well, since elephants are made for walking, health problems may develop from standing around for extended periods, or existing health issues may be made worse.

The kind of management captive elephants are subjected to can also impact their welfare and quality of life. Two management systems predominate today – negative reinforcement and reward-based.

The first management system is based on negative reinforcement. This system requires establishing dominance over elephants and often involves the use of chains and a sharp tool called a bullhook (or ankus) that is used for control purposes. The point or hook of the bullhook is applied to a sensitive
part of the elephant’s body (e.g., around the feet, behind the ears, under the chin, inside the mouth and other sensitive areas around the face) to cause discomfort or pain. The elephants don’t like it, so they move away from the pain in the direction the handler or trainer wants. There are many instances of the bullhook being used to strike or hurt elephants and some jurisdictions have banned its use entirely. It is important to note that if an elephant has been abused with a bullhook, they may continue to associate it with pain, so its mere presence may cause fear or stress. Some zoos continue to use bullhooks and other negative reinforcement through enclosure barriers, a practice that is safer for keepers, but it is still reliant on elephants having fear of the implement.

The other predominant form of elephant management is reward-based in which handlers and keepers only interact with elephants through safe, specially designed barriers by rewarding the animals when they perform the desired behavior. Training is done through positive reinforcement that does not involve the bullhook or inflicting pain or suffering of any kind.

Whenever the disposition of elephants is debated, consideration should always be given to space, climate and the management system of potential recipient facilities. Ignoring these fundamental requirements may result in decreased welfare and quality of life for the elephant and could lead to their suffering, injury, disease and/or premature mortality.
PAWS ARK2000 Sanctuary – GFAS accredited

These photos were taken in the area where Chai and Bamboo’s enclosure will be built. Total 15-20 acres

- Located in San Andreas, CA
- 15-20 acres available for Bamboo & Chai
- 4 Asian elephants (2 male, 2 female) & 6 female African elephants
- Never use bullhooks or other negative reinforcement on elephants

Notes: Provides more space than any US zoo. Situated in a warm climate. Varied terrain offers good exercise opportunities and natural pasture and browse. State of the art elephant barns and quarantine facilities.
The Elephant Sanctuary – GFAS accredited

- Located in Hohenwald, TN
- 2,100 acres available for non-quarantined female Asian elephants
- 10 female Asian elephants & 2 female African elephants
- Never use bullhooks or other negative reinforcement on elephants

Notes: Located in a moderate climate appropriate for elephants. Provides more space than any US facility housing elephants. Varied terrain offers good exercise for elephants and natural pasture and browse. State of the art barns and quarantine facilities.
Albuquerque Zoo Elephant Exhibit

- Located in Albuquerque, NM
- 2.5 acres
- 7 Asian elephants (2 males, 5 females)
- 0.36 acre per elephant
- Manage elephants from outside enclosure. Unclear if bullhooks or other negative reinforcement practices are still in use.

Notes: Lacks sufficient space for additional elephants.
Audubon Zoo Elephant Exhibit

- Located in New Orleans, LA
- 1 acre (including barn)
- 2 female Asian elephants
- Bullhooks used

Notes: Extremely small space. Negative reinforcement management practiced. Circus-style shows presented.
Bronx Zoo Elephant Exhibit

- Located in Bronx, NY
- Cold climate
- 1 acre
- 3 female Asian elephants
- Do not use bullhooks

Notes: Lacks sufficient space. Subject to cold winter weather resulting in elephants being locked in for long periods. Elephant exhibit to be phased out.
Buffalo Zoo Elephant Exhibit

- Located in Buffalo, NY
- Cold climate
- 0.4 acre
- 2 female Asian elephants
- Hard substrate
- Bullhooks used

Notes: Lacks sufficient space. Cold winter weather resulting in elephants being locked in for long periods. Negative reinforcement management practiced.
Busch Gardens Theme Park Elephant Exhibit

- Located in Tampa, FL
- 1 acre
- 6 Asian elephants (1 male & 5 females)
- Do not use bullhooks

Notes: No space to accommodate more elephants. Exhibit located near two noisy roller coasters.
Buttonwood Zoo Elephant Exhibit

- Located in New Bedford, MA
- 0.25 acre
- 2 female Asian elephants
- Bullhooks used

Notes: Lacks sufficient space. Situated in a cold climate. Negative reinforcement management practiced. Elephant exhibit to be phased out.
Chaffee Park Zoo Elephant Exhibit

- Located in Fresno, CA
- 0.5 acre, no natural browse
- 2 female Asian elephants
- Do not use bullhooks

Notes: Lacks sufficient space for more elephants. Has plans for expansion, but not yet underway.
Cincinnati Zoo Elephant Exhibit

- Located in Cincinnati, OH
- 0.8 acre
- 3 Asian elephants (1 male, 2 females)
- Bullhooks used

Notes: Lacks sufficient space. Situated in a cold climate. No pasture for grazing. Use negative reinforcement management.
Columbus Zoo Elephant Exhibit

- Located in Columbus, OH
- 1.8 acre
- No grass or foliage inside the enclosure
- 4 Asian elephants (2 males, 2 females)
- Bullhooks used

Notes: Lacks sufficient space for additional elephants. Situated in a cold climate. Practice negative reinforcement management. Hard substrate without pasture for grazing.
Denver Zoo Elephant Exhibit

- Located in Denver, CO
- 2.3 acres
- 4 Asian elephants (3 males, 1 female)
- Require confirmation that they have eliminated bullhooks

Notes: Lacks sufficient space for additional animals. Situated in a cold climate. Elephants perform “circus style” tricks.
Dickerson Park Zoo Elephant Exhibit

- Located in Springfield, MO
- 1.5 acres
- 5 Asian elephants (2 males, 3 female)
- Manage elephants from outside enclosure. However, keeper killed while using bullhook.

Notes: Lacks sufficient space for additional. Situated in a cold climate. Practice negative reinforcement management.
El Paso Zoo Elephant Exhibit

- Located in El Paso, TX
- 0.6 acres
- 2 female Asian elephants
- Do not use bullhooks

Notes: Very small. The USDA charged the City of El Paso with multiple violations of the Animal Welfare Act and fined the City $20,000 for beating an elephant named Sissy.
Fort Worth Zoo Elephant Exhibit

- Located in Fort Worth, TX
- 0.7 acres
- 7 Asian elephants (3 males, 4 females)
- Bullhooks used

Notes: Lacks sufficient space for additional elephants. Practices negative reinforcement management.
Honolulu Zoo Elephant Exhibit

- Located in Honolulu, HI
- 1.1 acres
- 2 female Asian elephants
- Requires confirmation as to whether they still use bullhooks.

Notes: Lack of natural browse in the enclosure. Transport would have to be done by air.
Houston Zoo Elephant Exhibit

- Located in Houston, TX
- 1.5 acres
- 8 Asian elephants (4 males, 4 females)
- Bullhooks used

Notes: Overcrowded. No space to accommodate additional elephants. Practice negative reinforcement management. Elephants perform “circus style” tricks.
Little Rock Zoo Elephant Exhibit

- Located in Little Rock, AR
- 0.5 acres
- 3 female Asian elephants
- Bullhooks used

Notes: Extremely small enclosure. Practice negative reinforcement management.
Los Angeles Zoo Elephant Exhibit

- Located in Los Angeles, CA
- 2.9 acres divided into 4 paddocks virtually no pasture for grazing
- 3 Asian elephants (1 male, 2 females) Male separated from females
- Requires confirmation as to whether they still use bullhooks

Notes: The LA Zoo elephant program remains highly controversial. Due to an ongoing legal action, the future of the elephant exhibit at the zoo is still in question. In the last legal action, the presiding judge concluded that the elephants' existence is "empty, purposeless, boring and occasionally painful" and that “the quality of life that Bull [Billy], Tina, and Jewel endure in their captivity is particularly poor."
Louisville Zoo Elephant Exhibit

- Located in Louisville, KY
- 0.25 acres
- 1 female African elephant and 1 female Asian elephant
- Bullhooks used

Notes: Extremely small enclosure. Practice negative reinforcement management.
Located in Fellsmere, FL
Future plans indicate 3 - 5 acre enclosures
Work with elephants from outside of the bars, but bullhooks still used.

Notes: Currently have no Asian elephants. Not yet AZA accredited. News reports indicate that they need to raise funds to improve the barns before they can open Asian elephant area. The facility is lacking in sufficient distance between elephant enclosures to properly quarantine. Two of the four African elephants that arrived healthy at the facility died within the first year, one related to the breeding program and the other from an infectious bacterium that the animal reportedly contracted onsite.
Oklahoma City Zoo Elephant Exhibit

- Located in Oklahoma City, OK
- 3.2 acres divided into 3 yards
- 5 Asian elephants (1 male, 4 females)
- Do not use bullhooks

Notes: Zoo says the facility is designed to hold 4 females and 2 males, adding 2 more females would overcrowd the enclosure. Steep moat that could pose a danger to the elephants. Still have animals perform circus style tricks.

Situated in cold climate.
Oregon Zoo Elephant Exhibit

- Located in Portland, OR
- 0.8 acres
- 8 Asian elephants (4 males, 4 females)
- Bullhooks used

Notes: Small, overcrowded exhibit. Practice negative reinforcement management. Lacks any pasture for grazing.
Phoenix Zoo Elephant Exhibit

- Located in Phoenix, AZ
- 1 acre
- 3 female Asian elephants
- Do not use bullhooks

Notes: Small exhibit. Elephants reportedly have social behavior problems and are often housed separately as a result.
Point Defiance Zoo Elephant Exhibit

- Located in Tacoma, WA
- 0.7 acres
- 2 female Asian elephants
- Do not use bullhooks

Notes: Small exhibit. Elephant exhibit to be phased out.
Rosamond Gifford Zoo Elephant Exhibit

- Located in Syracuse, NY
- 2.4 acres
- 6 Asian elephants (1 male, 5 females)
- Bullhooks used

Notes: Overcrowded enclosure. Situated in a cold climate. Practice negative reinforcement management.
San Antonio Zoo Elephant Exhibit

- Located in San Antonio, TX
- 0.25 acres
- 1 female Asian elephant (the other elephant in photo died in 2013)
- Do not use bullhooks

Notes: Extremely small enclosure, lacking any vegetation.
San Diego Zoo Elephant Exhibit

- Located in San Diego, CA
- 2 acres
- 7 elephants - Asians (1 male, 3 female) & 3 female African elephants
- Do not use bullhooks

Notes: Enclosure already overcrowded, with no pasture for grazing.
Santa Barbara Zoo Elephant Exhibit

- Located in Santa Barbara, CA
- 0.25 acres
- 2 female Asian elephants
- Requires confirmation as to whether they still use bullhooks.

Notes: Very small enclosure, lacking any vegetation. Elephant exhibit to be phased out.
Smithsonian National Zoo Elephant Exhibit

- Located in Washington, DC
- 1.9 acres
- 7 Asian elephants (1 male, 6 females)
- Do not use bullhooks, but still use stick to discipline elephants

Notes: Lack of space for additional elephants. Situated in a cold climate.
St. Louis Zoo Elephant Enclosure

- Located in St. Louis, MO
- 2.1 acres
- 10 Asian elephants (1 male, 9 females)
- Do not use bullhooks

Notes: Enclosure already overcrowded. Situated in a cold climate. Sri from WPZ was sent to this zoo previously. Zoo has indicated they have an elephant with TB that they have no idea how it was contracted and the zoo does not have sufficient space to quarantine them.
Topeka Zoo Elephant Exhibit

- Located in Topeka, KS
- 0.4 acres
- 1 female Asian elephant & 1 female African elephant
- Do not use bullhooks

Notes: Very small enclosure. Situated in a cold climate.
Tulsa Zoo Elephant Exhibit

- Located in Tulsa, OK
- 1 acre
- 3 Asian elephants (1 male, 2 females)
- Do not use bullhooks

Notes: Small enclosure, lacking grazing pasture.
Zoo Miami Elephant Exhibit

- Located in Miami, FL
- 1 acre
- 2 Asian elephants (1 male, 1 female) & 3 African elephants (1 male, 2 females)
- Manage from outside enclosure. Not determined if bullhooks or other negative reinforcement is still in use.

Notes: Space not large enough to accommodate more elephants.
Climate map - Average Annual Minimum Temperature
Zoocheck Inc.

788 ½ O’Connor Drive
Toronto, Ontario
M4B 2S6, Canada

(416) 285-1744

zoocheck@zoocheck.com

www.zoocheck.com