



BOBBY JINDAL  
GOVERNOR

*State of Louisiana*  
DEPARTMENT OF WILDLIFE AND FISHERIES  
OFFICE OF SECRETARY

ROBERT J. BARHAM  
SECRETARY

October 1, 2014

Honorable Gordon Dove, Chairman  
House Committee on Natural Resources &  
Environment  
Post Office Box 44486  
State Capitol  
Baton Rouge, LA 70804

Honorable Gerald Long, Chairman  
Senate Committee on Natural Resources  
Post Office Box 94183  
State Capitol  
Baton Rouge, LA 70804

RE: The Possession of Potentially Dangerous Wild Quadrupeds, Big Exotic Cats and non-human Primates Permit Program Rules and Regulations

Dear Sirs:

This letter summarizes public comment related to the above-referenced Notice of Intent, Louisiana Register Vol. 40, No. 7, July 20, 2014, as required by the Administrative Procedure Act (R.S. 49:968D(1)(b)). The Louisiana Wildlife and Fisheries Commission approved the Notice of Intent during their regular meeting of July 3, 2014 and there were no public comments received during the Commission meeting.

A public comment period was offered from July 3 through August 30, 2014.

- The Department received an overwhelming 37,974 written comments in support of the rule while only 3 opposed.
- Additional opposition was received in the form of two petitions totaling 902 signatures.
- A public hearing was held with 29 persons present
  - 04 Did not Comment
  - 18 In support
  - 07 In opposition
    - The Department failed to give adequate notice of the proposed amendments. The concern was that the Department's proposed amendment was published on July 20, 2014 yet potential applicants were expected to submit applications by July 1, 2014. LAC 76:V.115(F.1.a) provides:
      - any entity that has submitted to the department on or before July 1, 2014 an application as "an other zoo" or educational institution under this subsection shall not be required to be publicly or municipally owned
        - All existing entities were either under the application process (applications were received prior to July 1, 2014 and recognized as such) or permitted

- The definition of “zoo” relative to non-AZA entities as being publically or municipally owned was unfair and would restrict business potential. Zoos, by their nature, must be funded long term beyond the tenure of one owner or board; therefore, zoos must be able to withstand the loss of any one individual so as not to become a liability to the governing authority under which they exist.
  - One organization, which submitted comments in support of the amended regulations, was concerned that the definition of zoo was vague and suggested the following edits (struck, bold and underlined text are organization’s proposed edits):
    - A zoo, for purposes of this subsection, is defined as a **publicly or municipally-owned** permanent institution that: owns and maintains multiple species of wildlife is under the direction of at least one full-time professional staff member who possesses appropriate knowledge and experience in zoological park management; employs **full-time paid staff members who are trained in the care of the species that the facility keeps;** provides its animals with **species-appropriate care, enrichment, veterinary services, and husbandry;** exhibits the animals to the public on a regular basis; and has as its primary mission the exhibition, conservation, and preservation of animals in an educational and scientific manner.

The Department does not feel this change is warranted at this time. No changes to this rule have been proposed

Should you have questions or comments, please contact Melissa Collins at 225.763.8584 or by email at [mcollins@wlf.la.gov](mailto:mcollins@wlf.la.gov).

Sincerely,



Robert J. Barham  
Secretary

RJB|mc|wb

cc Jimmy Anthony, LDWF  
Fred Whitrock, LDWF  
Melissa Collins, LDWF