

City Council Work Session Agenda Item

Subject: Discussion of Bramble Park Zoo Operational Plan
Meeting: City Council Work Session - Dec 09 2024
From: Dusty Rodiek, Director of Parks, Recreations & Forestry

BACKGROUND INFORMATION:

In September, the Bramble Park Zoo was denied accreditation through the Association of Zoos and Aquariums. In response, a joint meeting was held with the Lake Area Zoological Society and the Parks and Recreation Board to understand where we are and to provide input on the following recommendations and action items. In the end, the Park Board voted to recommend moving forward with pursuing reaccreditation with AZA utilizing the AZA's Pathways Program.

FINANCIAL CONSIDERATIONS:

The plan is to regain AZA accreditation while staying within current city support levels and capital plans with the assistance of the Lake Area Zoological Society partner organization.

OVERSIGHT / PROJECT RESPONSIBILITY:

Stacy Plocher – Bramble Park Zoo Superintendent, Dusty Rodiek – Parks, Recreation & Forestry Director

STAFF RECOMMENDATION / SUGGESTED MOTION:

Endorse recommendations

ATTACHMENT(S):

[Bramble Park Outcome Ltr \(Denied\)](#)

[Bramble Park Zoo - Recommendations- Action Items](#)

[Report on Progress towards AZA Standard compliance - 11-21-24](#)

September 27, 2024

CONFIDENTIAL

Stacy Plocher, Zoo Manager
Bramble Park Zoo
800 10th St Nw
Watertown, SD 57201-8806

Dear Ms. Plocher:

As you know, at its meeting in Calgary, Alberta, Canada, on September 15, 2024, the AZA Accreditation Commission voted to deny the accreditation of the Bramble Park Zoo. In making its decision the Commission concluded that, at present, the institution does not meet accreditation standards in a number of key areas. Additionally, the Commission believes that the number and nature of the concerns are such that they cannot be resolved in one year or less. Among the serious concerns are:

- Lack of significant progress advancing modern zoological practices and philosophies over the past several accreditation cycles;
- A number of exhibits and holding facilities lack size and complexity to provide opportunities for animals to express natural behaviors and ensure their wellbeing. This is especially notable for primate and carnivore enclosures and for animals locked in holding for a significant number of hours each day or seasonally;
- A pattern of inconsistent funding and financial support;
- Insufficient staffing to meet the needs of the facility.

Although accreditation was denied, the Commission would like to express its support for the recent change in zoo leadership and the current direction of the facility under your leadership. Following years of stagnation under the previous administration, it is obvious that progress is being made, and the Commission recognizes that cultural shifts take time. It is critical that the City and Lake Area Zoological Society continue to support the zoo as it moves forward, for the wellbeing of both the animals and the staff. A collective commitment will help Bramble Park Zoo fulfill its conservation, education, and community service mission.

Appeals Process: If you wish to appeal the decision of the Accreditation Commission, a request for appeal may be filed with the AZA Executive Committee in writing within thirty (30) days of the date of this letter. If an appeal is filed, the Executive Committee must decide within forty-five (45) days of its receipt whether to grant the appeal. If an appeal is granted, it will be heard by the AZA Board of Directors at its next regularly scheduled meeting. The request for

appeal should be sent to the Executive Committee in care of Craig Hoover, Executive Vice President, Association of Zoos & Aquariums, by email to choover@aza.org.

SSPs and Animals On Loan: If you choose not to submit a request for appeal, you should begin notifying every SSP in which you are a participant of your change in membership status, as well as those AZA-accredited institutions from which you now have animals on loan. If you do intend to submit a request for appeal these notifications can be withheld until a decision on the appeal has been made.

To Reapply: Please note that following denial of accreditation, an institution may not reapply for accreditation for at least one year, and after all problems cited on the List of Concerns have been redressed. The earliest date you may submit an application is September 1, 2025.

Pathway Toward Membership: If you wish to be provided a coach to help you work toward regaining AZA accreditation, that service can be obtained by joining the AZA program for non-member facilities called Pathway Toward Membership (PTM). In addition to other benefits of the program, your assigned coach could visit periodically, review plans and practices, provide feedback in all areas, and be available by phone and email as needed. When ready to apply for accreditation, PTM participants pay the same filing fee as currently accredited institutions. There is no requirement to join PTM, but facilities that are not enrolled in PTM must pay a higher accreditation filing fee when they submit their accreditation application.

Please don't hesitate to contact me, AZA Executive Vice President Craig Hoover, or AZA Vice President of Accreditation Programs Jenn DiNenna if you have questions, or need assistance of any kind. The AZA Board of Directors and the Accreditation Commission stand ready to work with you in assuring that the Bramble Park Zoo is well positioned when it next makes application, and we look forward to the time when AZA accreditation is achieved once again.

Sincerely,



Craig Piper

Chair, Accreditation Commission [October 1, 2021 – September 30, 2025]

cc: Reid Holien

Craig Hoover, Executive Vice President

Jenn DiNenna, Vice President, Accreditation Programs

Accreditation Commission

Bramble Park Zoo - Recommendations/Action Items

11/22/24

Objective: Within 4 years, regain AZA accreditation while staying within current city support levels and capital plans with the assistance of the Lake Area Zoological Society partner organization.

Background: In September, the Bramble Park Zoo was denied accreditation through the Association of Zoos and Aquariums. While this decision was disappointing, it's not catastrophic and ultimately will act as a catalyst for change. Each year the AZA standards continue to evolve but the margin of our zoo not being accredited this cycle was extremely thin. In fact, the visiting inspection committee recommended our approval at the national conference. However, the greater committee cited in the attached Outcome Letter *"a lack of significant progress advancing modern zoological practices and philosophies over the past several accreditation cycles"*. The same letter also expresses support for the current direction of the facility. We are doing a lot of things right.

In response, a joint meeting was held with the Lake Area Zoological Society and the Parks and Recreation Board to understand where we are and to provide input on the following action items. In the end, the Park Board voted to recommend moving forward with pursuing reaccreditation with AZA utilizing the AZA's Pathways Program.

Strategic Action Items

1. Facility Improvements
 - a. Prioritized and phased approach based on AZA concerns and animal welfare needs while fitting within current capital plans.
 - i. 2025: Wolf Exhibit (2024 carryover), Bears/Cats exhibit updates, HVAC in Discovery Center
 - ii. 2026: Bears/Cats indoor holding area updates, primate indoor holding area updates
 - iii. 2027: Alligator exhibit and indoor holding updates, Discovery Center updates
 - iv. 2028: Update kangaroo fencing, crane fencing
2. Balance operations to available resources to support organizational sustainability
 - a. Adjustments to animal collection
 - i. Downsize the collection where appropriate.
 - ii. Transition toward more winter viewing or cold hardy species that are more viewable year round.
 - b. Modify the migratory bird rehabilitation program to lower costs or increase support levels.
3. Evaluate Zoo Staffing levels - No net increase requested.
 - a. As the collection is downsized, the zoo keeping staffing levels will naturally balance
 - b. Adapt current positions to address AZA concerns while gaining operational efficiencies.
 - i. Modify the current open Zookeeper position to an Animal Care Supervisor role. This position would operate as a working supervisor for the zoo keeping staff while performing some Curator duties specifically related to animal care.
 - ii. Revise the former Office Specialist position to act as a Visitor Services/Education Assistant to provide support those areas.
 - c. Work in cooperation with LAZS to transition away from city staff providing full administrative and event support. This change will also help to balance the workload for the affected positions.
 - d. Evaluate hours of operation

- e. Examine the use of automated systems where appropriate.
- 4. Reshape partnership roles and focus with Lake Area Zoological Society (LAZS)
 - a. LAZS has started the process of reworking the Memo of Understanding to better define their role in supporting the zoo with a focus on project and endowment fundraising.
 - b. LAZS has begun updating their by-laws.
 - c. LAZS will take a more active role in their event staffing and internal record keeping.
- 5. Explore the use of automated systems to modernize operations and improve the visitor experience.
 - a. Self-service Kiosks for general admissions ticketing, donation site.
 - b. Interactive/educational displays – GPS triggered self-guided tours, AR or VR experiences.
 - c. Animal care – health monitoring, feeding/watering systems
- 6. Commission an updated economic impact study for the zoo.
- 7. Realign Master and Strategic Plan content to reflect current operations and goals.

Reasons to regain AZA accreditation:

- 1. AZA accreditation demonstrates we are a top tier zoo in all areas.
- 2. Participation in over 500 Animal programs to aid in collection planning and breeding so people can come to the zoo and see baby animals/family groups.
- 3. Ability to obtain new animals as donations instead of paying for them, which aids in helping keep the collection fresh.
- 4. Access to Scientific Advisory Groups to guide us in ensuring best practices to provide the best care for our animals .
- 5. Free professional development through AZA Learn and Connect publication.
- 6. Easily participate in reciprocity with other AZA facilities.
- 7. Access to AZA grant funding programs.
- 8. Requires fewer permits to operate and transfer animals if accredited.
- 9. Free job postings on the AZA job board.
- 10. Licensing discounts.

The Pathways toward Membership Program Advantages:

- 1. Provides 1-5 years to regain accreditation.
- 2. An assigned Coach to provide advice and first hand feedback.
- 3. Detailed reports after Coach visits and mock Inspections.
- 4. Option to request an in person visit by AZA Leadership or Board Member to ensure we are ready for reaccreditation.
- 5. Recognition by the AZA community that we are working toward AZA accreditation that promotes cooperation with other facilities.
- 6. Access to the Pathway Toward Membership Network Group.
- 7. Continued access to the species sustainability database.
- 8. Collection Sustainability Consultation by AZA staff.
- 9. Continued access to current AZA peer networks, job posting sites.
- 10. Discounted accreditation filing fees.
- 11. Zoo Superintendent can participate in the AZA Director's meetings.

Report on Progress towards AZA Standard compliance

The following is a list of Standards not fully met during our accreditation cycle and the actions we have taken to address them:

1. Are animals presented in a manner that reflects modern zoological practices in exhibit design throughout the institution? [1.5.1]
2. Are all animals housed in habitats/environments which meet their physical, psychological, and social needs? [1.5.2]
3. Are all animals provided the opportunity to choose among a variety of conditions within their environment? [1.5.2.2]
 - a. AC-6, AC-48: The zoo's black bear exhibit is on the smaller size and completely constructed with concrete. There is a very small area where natural substrate (often hay) can be added for foraging. This design restricts exhibit complexity for the bears and offers a less-than-modern exhibit experience for guests.

We have solicited quotes to improve the bear exhibit and plan to move forward with improvements in 2025 as per the CIP. The plan is to expand the habitat to eliminate wasted space in the area. This will improve the bears' wellbeing so they will not be on concrete all the time, they will have the choice of substrates, they will be able to dig, and the flow of the zoo for the public will be improved. In order to improve the bears' habitat safely we will need to relocate our tiger to another facility. We have been in communication with the Tiger program and there are several zoos that have shown interest.

4. 1.3.2 does the institution have an appropriate method for assessing the willingness and ability of the non-AZA facility to provide adequate care?
 - a. No. AC-19: The previous administration was selling SSP species to non-accredited zoos

We no longer sell SSP species. We work with the animal programs to ensure the animals have proper care here and anywhere they go. We have a robust screening for non-AZA zoos and we follow up yearly regarding animals on loan.

5. Are enclosure substrates, design features, and "furniture" sufficient, and adequate to meet the needs of the animals, including those in multi-species exhibits? [1.5.1, 1.5.2] Q
6. Are all holding areas sufficient in size and structure to comfortably contain the animals for extended periods due to inclement weather? [1.5.7]
 - a. No. AC-51: Many of the zoo's species, particularly primates and carnivores, are locked in holding areas nightly and during extended periods in the winter. Many of these holding areas are lacking in size and complexity, and with the zoo only being open to the public for six hours daily, some animals are spending upwards of 18 hours a day in these holding areas, even during warmer seasons. Security concerns were cited for not allowing animal access to exhibits at night, but no risk assessments for these practices have been performed. There are a number of night houses, particularly for the primates, where lighting is minimal. This affects the animals and the keepers performing maintenance of the holding areas.

We performed risk assessments and when weather is appropriate, we began leaving the primates and carnivores with access to their outdoor habitat overnight. This allows the animals to have more choice

and control of their environment and greatly increases the amount of room the animals have. During the winter and bad weather, the animals are still locked inside, so in 2026 we plan to improve the caging inside the holdings. The new caging will add space for the animals and allow us to create more complex indoor habitats. We have already purchased new lights for the primate area including full spectrum lighting, which will improve their overall wellbeing during the winter months.

7. Are there sufficient resources and paid or unpaid staff available to implement the animal enrichment program? [1.6.2, 1.6.3]
- a. This was questionable. AC-56: Although additional staffing in the animal care areas has been added in the last few years, increased regulatory requirements combined with challenges resulting from employees taking leave and employee vacancies is still resulting in less-than-ideal animal care staffing levels.

We have added more part time staff to cover any leaves. Also with the new position, they will oversee the welfare programs including the enrichment program. They will take the extra duties keepers currently have to give keepers more time for enrichment, training, and wellbeing updates.

8. Is a paid staff member designated as being responsible for the institution's animal recordkeeping system? [1.4.7]
- a. This was questionable. AC-14: More familiarity with ZIMS is needed

We had previously planned to send the registrar back to record keeping school, but with the new position, they will help make sure records are up to date also.

9. If the institution is currently AZA-accredited, has it shown increased involvement in field conservation over the last five years since the previous inspection?
- a. No but adequate

We don't have field research but we have started a partnership with the local colleges and if we continue with the rehab program we can look at ways to efficiently participate in studies.

10. Is the institution participating in every SAFE program that pertains to an animal belonging to the institution? [3.3.0]
- a. No but adequate

We don't have to participate in every SAFE program. We have expanded our participation to an adequate level. They are changing the SAFE programs also, so this will be adjusted next round.

11. Does the institution have a commitment to scientific study proportionate to the size and scope of its facilities? [5.0]
- a. No. SA-1, SA-7: The zoo's involvement in scientific research is minimal

In the last 5 years we had only worked with one project. We are now working with SDSU labs on a research project and hope to grow that program. We also are working with the new Natural Resource teacher at LATC.

12. Are the animals identified and interpreted for the public? [4.3.3]
- a. Questionable. EI-10: The Visiting Committee did see a number of new animal identification signs on certain exhibits; however, some exhibits lacked animal identification signs, and others only identified some of the animals in a mixed species exhibit.

We have several signs ordered and replaced. As we evaluate the collection, we will add signs as needed.

13. Does the governing authority leave the day-to-day management of the institution to the CEO/Director? [6.3, 6.4]
- a. GA-9, GA-12: The former long term zoo director is still working for the zoo and this has the potential to create conflicts with the new zoo manager.

The former director is done working for the zoo at the end of the year, so the conflict will be eliminated.

14. Is there a sufficient number of paid and unpaid staff to properly care for the animals and to conduct the institution's programs? [7.3]
- a. S-1: Although additional staffing in the animal care areas has been added in the last few years, increased regulatory requirements combined with challenges resulting from employees taking leave and employee vacancies is still resulting in less-than-ideal animal care staffing levels. Additionally, staffing levels in the zoo's education and maintenance areas, combined with the elimination of the historic curator position, appear insufficient to meet the programmatic and operational needs of the zoo.
15. Do the salaries of the paid staff appear to be within acceptable limits? [7.4]
- a. SI-2: The heavy reliance on part-time staffing at low wages results in vacancies and hiring challenges.

We increased part-time salary wages to stay competitive. We were able to hire the part time maintenance position due to the increase. With the reorganizing of the positions, we will be sufficiently staffed.

16. Does the organization of paid staff authority lines appear to cause any problems? [7.6]
- a. S-8: The former long term zoo director still working for the zoo has the potential to create conflicts with the new zoo manager.

The former director will no longer be working so there will be no issue.

17. Does the institution have and follow a diversity, equity, access, and inclusion program for paid and unpaid staff, guests/audience, and suppliers? [7.9] If "yes", is the program proactive and transparent, with measurable goals for assessing progress
- a. S-16: The zoo does not appear to have a true DEI program with measurable goals. They do conduct programs for at-risk youth in the community which is commendable.

However, the program should be more comprehensive and proactive, and include a method of tracking progress.

We have talked to other organizations to gain advice on creating measurable goals and tracking progress. We are comprehensive and accepting of every person, but we need to track it and prove it.

18. Is the level of paid and unpaid staff involvement in AZA committees and activities and other professional organizations in line with that of similar-sized institutions?
19. Is the institution encouraging an appropriate number of paid staff to assume leadership roles in AZA animal programs (i.e., SSP coordinators, TAG Chairs, etc.)?
 - a. S-20,S-21: The zoos involvement in AZA conservation leadership positions is minimal. Staff are not actively encouraged to participate

Staff is learning about AZA roles they may participate in. Historically they were unaware it was an option. It has been discussed, but until positions are filled and duties reallocated staff don't feel they have the time to participate currently.

20. Are the bylaws of the support organization adequate?
21. Do the stated purposes of the support organization meet the needs of the institution?
22. Are the purposes being furthered?
23. Does the formal agreement between the institution and the support organization clearly delineate the current roles and responsibilities of the support organization? [8.3]
24. Is the formal agreement between the institution and the support organization adhered to in practice? [8.3]
25. Are activities sponsored by the support organization appropriate and meeting the goals of both it and the institution?
 - a. SO-5, SO-6, SO-7, SO-9, SO-10, SO-15: The support organization provides some annual financial support (derived mainly from events and revenue from certain high level memberships) to the zoo for operations. However, there appears to be a lack of structure, focus, and engagement within the organization which, in turn, diminishes their ability to effectively fundraise for the future capital needs of the zoo. Lack of engagement of many of its members also results in an additional burden on zoo staff related to support organization fundraising events and activities.

LAZS is updating their bylaws and formal agreement.

26. Is the total financial support adequate to meet the needs of the institution? [9.1]
27. Are sufficient amounts allocated for capital improvements and major repairs/ replacements? [9.4, 10.1.2]
 - a. F-5, F-11: There is questionable funding related to major capital improvements and staffing.

We understand the City funds are limited and we are part of a team, so we have prioritized capital improvements, made realistic plans to move forward with allocated funds, and have recommended ways to efficiently balance staffing. Some of those steps are reducing the collection size or changing the collection to less demanding species, having one person overseeing animal care programs, creating flexible positions to help in multiple areas, utilizing the City's replacement schedule to stay on top of repairs and issues so they stay small and planned for.

28. Are all animal enclosures of sufficient size and complexity to provide for the animals' physical, social, and psychological well-being throughout the year? [1.2.2, 1.5.2]
- PF-3: The zoo's black bear exhibit is on the smaller size and completely constructed with concrete. There is a very small area where natural substrate (often hay) can be added for foraging. This design restricts exhibit complexity for the bears and offers a less-than-modern exhibit experience for guests. Many of the zoo's species, particularly primates and carnivores, are locked in holding areas nightly and during extended periods in the winter. Many of these holding areas are lacking in size and complexity, and with the zoo only being open to the public for six hours daily, some animals are spending upwards of 18 hours a day in these holding areas, even during warmer seasons. Security concerns were cited for not allowing animal access to exhibits at night, but no risk assessments for these practices have been performed.

These issues have been addressed in the CIP plan.

29. Do aquatic exhibits provide sufficient space or sufficient volume of water for the physical, social, and psychological well-being of the inhabitants? [1.2.2, 1.5.2]
- PF-4: The tank for the pacu is small.

Several of our aquariums are outdated, costly to repair, and timely to maintain. This is part of the collection evaluation and we will be removing the tanks and creating a play area for kids, so it will take less staff time, less financial support, and better serve the community due to its ability to be enjoyed year round by people of all ages.

30. Are all enclosures (tanks) used to exhibit or maintain fish and/or aquatic invertebrates equipped with a warning mechanism to alert staff about critical life support failures in a timely manner? [10.2.1.1]
- NO. Unacceptable.

When we update the tanks we are keeping in 2027 we can look into alarms. Currently if our life support systems fail the tanks have enough oxygen to last until the next day when staff arrive. It is not a responsible use of funds to purchase an alarm system for exhibits we are phasing out.

31. Are all animal exhibits, gates, doors, chutes, shift boxes, holding areas, etc. sufficiently secured to prevent unintentional animal egress? [11.3.1]
- SS-24: Although locking pins are in place to secure the shift doors in the leopard, tiger, and bear holding areas, these pins cannot currently be locked to prevent accidental removal of the pins

We have added locks to the pins and we are adding secondary locks to the doors as well to increase safety.

32. Are the four basic types of live-action emergency drills (fire; weather, or other environmental emergency appropriate to the region; injury to paid or unpaid staff or a guest; animal escape) being conducted, recorded, and evaluated annually? [11.2.5] < A + >
- Table top drills don't count so we missed one.

Stacy was not aware table top drills didn't count, so we will do live action drills for the five types.

33. Does the institution participate in active shooter training for paid and unpaid staff? [11.2.8]
a. We were not doing active shooter training or drills

We have worked with the police department on active shooter training.

34. Is guest transportation on institution grounds available and adequate? [12.1]
a. No but acceptable

If a guest has a medical emergency, we can aid them in transportation but otherwise we utilize wheelchairs. We are designed so emergency services can easily access the zoo.

35. Are all the exhibits aesthetically pleasing and reflective of modern zoological philosophies and design? [1.5.1, 1.5.2, 10.1.0, 12.4]
a. GS-21: The zoo's black bear exhibit is on the smaller size and completely constructed with concrete. There is a very small area where natural substrate (often hay) can be added for foraging. This design restricts exhibit complexity for the bears and offers a less-than-modern exhibit experience for guests

As we improve exhibits, we will address this concern.

36. Does the institution have a written master plan? [13.1 If "yes" to SP-1, is the institution reasonably following that plan?
a. SP-1: Master plan needs updating

When we finalize our new goals and plans we will update both our strategic plan and our master plan.