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DECLARATION OF DAVID HANCOCKS

David Hancocks declares:

1. I reside in Melbourne, Australia. I am an architect by education and have specialized in Zoo design and planning. I have served as the design coordinator and then Director of the Woodland Park Zoo in Seattle, Washington, from 1974 to 1984, Director of the Arizona-Sonora Desert Museum in Tucson, from 1989 to 1997, and Director of the Werribee Open Range Zoo in Australia, from 1998 to 2003. I am the author of the book, "A Different Nature: The Paradoxical World of Zoos and Their Uncertain Future", published in 2001. A copy of my curriculum vitae is attached hereto as Exhibit L.

2. The facts set forth in this declaration are known to me of my own personal knowledge. If called as a witness, I could and would competently testify to each fact set forth herein.

3. I have worked in and designed traditional Zoo environments. I have also endeavored to analyze the deficiencies in these approaches and improve upon those models. At the Woodland Park Zoo, I worked with a team designing the world's first Zoo plan that put animals in spaces that looked and felt like natural habitats. Our goal was to give maximum opportunity for animals to engage in natural behaviors in large and complex natural landscapes.

4. The Arizona-Sonora Desert Museum has 300 animal species and 1,200 kinds of plants on 21 acres of desert. Unlike conventional Zoos, the museum only keeps species that are native to the area. Its mission is not to give visitors a snapshot of wildlife everywhere but to give the full story of a single ecology. At the Werribee Open Range

1 Zoo, which is over 550 acres, the animals are kept 'open range'. Its African Savanna  
2 paddock is 95 acres.

3  
4 5. Largely for financial reasons, many Zoos acquire and maintain elephants,  
5 despite the fact that they are either unwilling or incapable of providing proper care for  
6 them. As a result, the history of elephants in Zoos, like the Los Angeles Zoo, reveals a sad  
7 record of significant mental and physical pain.

8  
9 6. Wild elephants are astonishingly intelligent, perceptive and complex beings.  
10 They live in caring and secure extended families that stay intact for life. But Zoo  
11 elephants have traditionally been forced to endure difficult and lonely lives. They are  
12 commonly shipped around the world to new facilities. In small cramped and sterile  
13 quarters, they are invariably chained for long periods and sometimes beaten into  
14 compliance with the will of the trainers and directors of the facilities where they are sent.

15  
16 7. These animals need companionship and stimulation. When separated from  
17 friends and family, and restricted to living in a cramped space, elephants suffer  
18 emotionally. Many exhibit severe emotional distress by repetitively bobbing their heads or  
19 swaying back and forth for hours on end. Based upon the testimony of plaintiff Robert  
20 Culp, it appears that is exactly the kind of behavior exhibited by the sole elephant currently  
21 kept by the L.A. Zoo.

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23 8. Based upon the testimony of the Person Most Knowledgeable about the care  
24 of the elephants at the L.A. Zoo, Mr. Briscoe, and the declaration of Dr. Gary Kuehn, I was  
25 saddened to learn that the Los Angeles Zoo has used severe and abusive tactics to "train"  
26 and "discipline" its elephants, including use of Bull Hooks and severe electrocution  
27 techniques. Such brutality is not necessary, but it is also not uncommon, given the small  
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1 size of the area in which these massive creatures are expected to live under the direction  
2 and control of mankind.

3  
4 9. Los Angeles continues to confine its elephants to a space much too small for  
5 their physical, emotional or social well being. The current Los Angeles Zoo director has  
6 testified that he intends to use the City Council approval for expansion of the elephant  
7 exhibit to acquire more elephants and begin a breeding program. Given the nature of the  
8 design plans, this will translate to an insignificant increase in available space (for purposes  
9 of housing elephants) and will unquestionably lead to further physical and emotional  
10 elephant suffering on several levels. The size increase, given the relative size and needs of  
11 elephants, is like enlarging the size of a closet and expecting people to be satisfied to live  
12 there.

13  
14 10. It is well established that space means a great deal to elephants. Compared  
15 with most animals, including primates, ungulates, carnivores, reptiles and birds, elephants  
16 spend the vast majority of their time – 20 hours of every 24 – in movement. As confirmed  
17 by Dr. Kuehn and the work of world renowned expert, Dr. Joyce Poole, the size, intellect  
18 and physical needs of elephants means they must have the opportunity for sustained  
19 physical movement and, thus need very large and very complex spaces.

20  
21 11. Despite the deposition testimony of Mr. Lewis, it is a fact known to all Zoo  
22 directors that breeding elephants will not "save" them. In truth, Zoos breed elephants  
23 principally because baby elephants guarantee huge attendance increases. If Zoos truly  
24 wanted to save elephants they would be dedicating their resources to protecting wild  
25 elephant habitats. While I agree with Mr. Lewis that in order to properly care for  
26 elephants, a Zoo must attend to their physical, emotional and social needs, neither the  
27 existing, nor the proposed expanded L.A. elephant habitat can adequately meet the needs  
28 of elephants in any of these critical areas.

1           12. The Los Angeles Zoo records themselves make it plain that the physical  
2 environment of that facility is harmful to the elephants that live there. The declaration of  
3 Dr. Kuehn confirms the reason why. It is a common problem in Zoos. The concrete and  
4 hard ground in the elephant pen create serious medical problems for the legs and feet of  
5 these massive animals. Foot problems are a common source of great physical pain and  
6 even death in Zoo elephants. It is highly likely that the small size of their enclosure in the  
7 Los Angeles Zoo will make it unavoidable that they will traverse the same ground over  
8 and over, compacting it to the point that they cannot safely stand anywhere without long  
9 term consequences.

10  
11           13. Plus, the small area available for these animals increases the "need" to move  
12 them about, chain them, restrict them and control them for a variety of legitimate and  
13 sometimes illegitimate reasons. The physical abuses inherent in this close connection  
14 between the Zoo officials and the elephants are never a factor in the wild. They can also be  
15 avoided in captivity, as evidenced in the two Elephant Sanctuaries in the US, where a  
16 different philosophy is evident, where they do not set out to rigidly control the elephants  
17 but instead give the animals as much free choice as possible, where the elephants have the  
18 quantity of space available to allow them to simply avoid people or other elephants when  
19 they choose to do so, and where the rich and complex quality of the environment allows  
20 them to engage in their natural behaviors as and when they wish. None of this is possible  
21 in the existing or proposed Los Angeles Zoo facility. It is simply too small.

22  
23           14. In addition, the Los Angeles Zoo seeks to start a breeding program, which  
24 will make it even more difficult to meet the social and emotional needs of these animals. It  
25 is an unavoidable fact that breeding elephants in Zoos is a low percentage proposition.  
26 Few baby elephants survive in Zoos. Only 17 babies survived from the last 37 Zoo births.  
27 Plus, a baby entering the world in the Los Angeles Zoo will be forced to live a life that is  
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1 inherently inadequate and with an almost guaranteed existence of critical deprivations and  
2 a reduced lifespan.

3  
4 15. If they survive, they will likely be forced into submission, as described by  
5 Dr. Kuehn. It is a certainty that they will have to live in the restricted space inherent in the  
6 L.A. Zoo environment. This means they will almost inevitably suffer foot and leg pain and  
7 disease, loneliness and boredom. These conditions mean long term suffering, followed  
8 often by premature death. The existing history at this Zoo facility confirms this to be true  
9 for the decades this facility has been in existence.

10  
11 16. Plus, as explained by Mr. Lewis, the current Zoo director, they do not plan to  
12 change their policies in any significant way. He also confirmed that if an elephant  
13 becomes part of their proposed breeding program, that animal will definitely be separated  
14 from family and friends, to be shipped from Zoo to Zoo as it serves their breeding  
15 purposes. This is also extremely harmful to the elephants. They thrive on the close bonds  
16 they form with their family members. This kind of indiscriminate separation of these  
17 sensitive animals is very much like tearing apart a human family and forcing each member  
18 to either live alone, or with strangers ... in a closet.

19  
20 17. Los Angeles does not need to imprison its elephants in isolation, in a  
21 cramped environment. I am advised that there is ample land available within the City  
22 borders that the Zoo could acquire and develop much like the highly successful sanctuaries  
23 now in existence. This approach would allow the Zoo to exhibit elephants in an  
24 environment which would not endanger them physically, encourage abuse, deprive them of  
25 intellectual stimulation or the rich social interactions with their family and friends ... and it  
26 would actually cost less than the proposed \$40 million dollar expansion.

1 18. Creative new approaches are also available which can satisfy the desire of  
2 zoo directors to show large animals like elephants. High-tech multi-media presentations  
3 can be extremely effective, and show natural behaviors never witnessed in captivity. I  
4 know that excellent film footage, supplemented with hands-on artifacts, well-trained and  
5 knowledgeable docents, and live video links to wild habitats can be more effective  
6 educationally than typical zoo exhibits of bored and unhappy animals.

7  
8 19. As an architect and zoo director, it is my opinion that the existing and  
9 proposed elephant exhibit at the Los Angeles Zoo fails to provide adequate care for the  
10 physical, emotional and social needs of their elephants. This inevitably leads to physical  
11 and emotional suffering and premature death of the elephants. Thus, it results in  
12 harm/damage to the elephants and wastes considerable amounts of money. Elephants are  
13 costly to acquire, transport, feed and care for. When these animals suffer and then die  
14 prematurely, everybody involved loses.

15  
16 I declare under penalty of perjury under the laws of the State of California that the  
17 foregoing is true and correct.

18  
19 Dated: January 1, 2008

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22 \_\_\_\_\_  
23 DAVID HANCOCKS