



United States Department of the Interior



FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

October 22, 2018

Mr. Joe Couceiro
Lowry Park Zoological Society of Tampa
1101 West Sligh Avenue
Tampa, Florida 33604

Dear Mr. Couceiro:

This letter responds to your request to renew your authorization under the Marine Mammal Protection Act (MMPA) [16 U.S.C. sections 1379(h), 1382 (c) and under the U.S. Endangered Species Act (ESA) section 10(a)(1)(A) to rescue, rehabilitate, release, and post-release monitor the West Indian manatees (*Trichechus manatus*), including the subspecies, *T.m. latirostris*, and *T.m. manatus*. The goal of the Rehabilitation Program is to rescue and rehabilitate injured and distressed manatees and release them back into the wild when medically feasible.

We have received information concerning the alleged activities of your lead veterinarian, Dr. Ray Ball, involving the treatment of manatees under his care. According to information received by the U.S. Fish and Wildlife Service (Service), Dr. Ball purportedly released an underweight manatee with open wounds and performed field amputations resulting in the bone of the animal protruding. If these allegations are true, these activities are not consistent with the "Guidelines for Release of Rehabilitated West Indian Manatees." According to your Letter of Authorization (LOA), Part III, Section D(3) under "Special Conditions for Critical Care and Rehabilitation/Holding Facilities," facilities are to "Treat injured and distressed manatees in a manner consistent with best medical treatment and practice methods and based on advice from a qualified manatee veterinarian." Therefore In accordance with Part III, Section D(9) of the LOA, Dr. Ball must cease all activities with manatees; please inform us who will be your acting lead veterinarian until this issued is resolved. In view of the credible reports raising significant questions as to whether the activities of Dr. Ball comply with the terms and conditions of the permit, the Service is seeking additional information from the facility as to whether the reported activities are consistent with the authorization in order to determine whether it should be renewed.

1. **Pneumothorax** – After chest taps were performed by Dr. Ball, on more than one occasion (manatees #102929 and #103118), the animals died, and the necropsy reports showed perforations in the lungs from the chest taps.

Question – Why did Dr. Ball continue performing chest taps when the necropsy report on one animal determined that the cause of death could have been related to perforations in the lungs as a result of the chest tap? Did Dr. Ball discuss this procedure with other specialists, such as those

from the North Florida Ecological Services Office, the USDA, and/or other specialists participating in the Manatee Rehabilitation Partnership meetings? If yes, with whom did Dr. Ball consult, what was the approximate date of the discussion(s), and what was the content and outcome of the discussion(s)?

2. **Field Amputation** – On more than one occasion, Dr. Ball performed in-field amputations of manatees' flipper, at times without treatment for infection and pain and at times releasing the manatees with exposed bones (manatees' #RNW1719 and #RNW1505).

Question – Why did Dr. Ball believe these animals were releasable under Part B of the "Guidelines for Release of Rehabilitated West Indian Manatees," entitled "Overview of Release Categories for Manatees?"

3. **Drugs** – On more than one occasion, experimental drugs and/or experimental-methods of administering drugs were used. Heparin therapy was administered to manatee #103357 beginning October 2016 and Dr. Ball allegedly administered "drug combinations" on manatee(s) that were considered physically compromised and for which he did not have or did not use equipment needed for the procedure; (manatee #HS8601).

Question – Pursuant to Part III (14) of the LOA's "Special Conditions for Critical Care and Rehabilitation/Holding Facilities," was the Service consulted prior to the above activities?

4. **Hay** – The use of feeding hay to young/growing manatees or animals that are physically compromised.

Questions – Please explain if and why you fed hay to such manatees in the categories as noted above.

Please provide the requested information by December 7, 2018, to avoid your request for renewal of your authorization from being abandoned and administratively closed. Once a file is closed you will need to submit a new application for the Service to consider your proposed activity.

Sincerely,



Anna Barry, Senior Biologist
Branch of Permits
Division of Management Authority