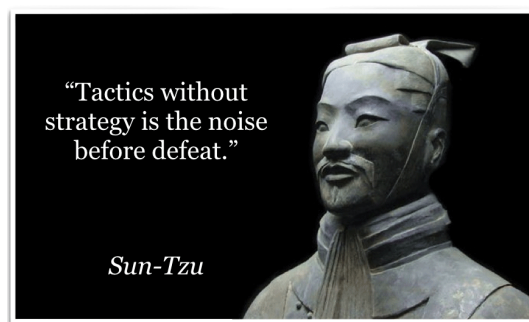


Review of the Zoo's Lion Incident Report April 4, 2025

Before I provide my detailed comments on the Zoo's Lion Incident Report, it is imperative that one recognizes that directing one's attention to a particular response that fails to address the root cause of the accident is misguided and borders on being a waste of time if one is serious about having a safe zoo.

To be more specific, the zoo suffers from three major transgressions. The first is a "loss of big picture." The authors failed to recognize that they have an "unsafe zoo"* and what they are unwittingly trying to do is make the case they can operate an "unsafe zoo" safely. What they should be doing is making the zoo safe such that they can't operate the zoo in a manner that will result in catastrophic results.

Case in point, the corrective actions for the Idaho Falls Zoo should have involved engineered safety measures not the cosmetic administrative controls that their report instituted. This behavior will not prevent another unfortunate accident with more devastating consequences. To quote someone far wiser than myself:



The zoo is blinded by this understanding when the Executive Director says things like the "zoo did nothing wrong!"

*I define “unsafe zoo” as any zoo where in certain cases only a miracle can prevent a catastrophic event. A classic example of this is when there are only administrative controls used to mitigate the consequences of single points of failure. This is why I entitled my previous report “Idaho Falls Zoo - None Done Call It Safe!” The report is on the website www.zoogonebad.com

The second transgression is failing to seriously and adequately care for the safety of the employees, volunteers and the public. Originally, I was given lip service saying how much they cared and that they would do everything possible to see that the lion incident would never happen again. This commitment was broken soon after. As an analogy, imagine you have a loved one, say a child or soulmate that is dying from an unknown cause. Would you try and diagnose it yourself. Of course not. Would you just go down to the Doc in the box on Utah Avenue and take the advice of the PA (physician assistant)? NO, you would not. You would in the case of the child seek answers from the Boston Children’s Hospital or other major reputable institutions specializing in child medicine. Similarly for an adult you might seek answers from the Mayo Clinic in Rochester or The John Hopkins Hospital in Baltimore.

In the case of the zoo, they decided that they were qualified to do the diagnosis themselves. I have written extensively and repeatedly why they were NOT qualified. Specifically see Part 1 “Management Failures leading to the near fatal lion incident” and Part 2 “Management failures after the near fatal lion incident” in the report “Idaho Falls Zoo - None Done Call It Safe!”

The people the zoo sought consultation from were two of the area nearby zoos and a fledgling consulting company specializing in

grief management. I will comment on these choices in my detailed comments on the zoo's final report.

If the zoo really cared, they would have sought the wisdom from major zoos like the San Diego Zoo, the Brookfield Zoo and the Smithsonian National Zoo. The Zoo could also have looked into the safety measures that maximum security prisons have and learned the whats and whys of their safety systems.

Additionally, if the zoo really cared about understanding the safety picture from housing apex predators in the middle of town, they missed/ignored a golden opportunity to get system safety advice from a national laboratory with extensive safety experience and an excellent reputation that is only two miles away! That institution is the Idaho National Laboratory (INL). The INL has contractual obligations to help the local community and has previously done so a couple of times at the Idaho Falls Zoo. I have made overtures on my own to establish this connection and am waiting for a response. I have little doubt that if the Mayor asked for help directly from the Lab Director they would welcome the opportunity.

The last transgression I will call for the lack of a better description: the God Complex. The Zoo has decided by themselves what is safe. They cannot say and they do not know how safe the zoo is. But that has not stopped them from continuing to operate and saying that the steps they have taken are sufficient to protect the workers/volunteers and the public. With the lack of any national standards establishing minimum levels of safety, the city government with input from the public should be the ones making decisions regarding acceptable safety levels, not the Zoo.

I have written why relying on accreditation by the AZA and permitting by the USDA/APHIS is inadequate when it comes to

workplace and public safety. See Part 6 Failure of Management Oversight in the report “Idaho Falls Zoo - None Done Call It Safe!”

With the above caveats I give you my review of the Zoo’s Lion Incident Report:

Idaho Falls Zoo Incident Investigation Report Review

This is a review of the Idaho Falls Zoo Incident Investigation Report dated January 29, 2025. The report consists of 4 parts: *Lion Incident Executive Summary* (LIES); *Incident Investigation Report*; *Zoo Boise Visit to Idaho Falls Zoo*; and *GRAZE, LLC Making a Safe Zoo Safer Consultation Report Idaho Falls Zoo*. This review will be limited to the two parts that the Idaho Falls Zoo prepared and which the Parks & Recreation Director said were the final word on the Lion incident.

Here are a few general observations. One of the first things I noticed was that the main report *Incident Investigation Report* was almost identical to the 30-day report the Zoo submitted to the Association of Zoos and Aquariums (AZA). There were only a couple of sentences in the entire document that changed. These had to do with changing from a 2 key 2 Lock (2K2L) procedure in the original document to a Lockout Tagout (LOTO) system. The report still says a final report will be submitted and that they are arranging a review by GRAZE! The GRAZE report is an attachment. Also, of note the report does not mention the other two reviews by Idaho Zoos.

The second observation was the Zoo prepared a separate document entitled “*Lion Incident Executive Summary*.” The summary includes items that are NOT in the main report like the reviews by the Boise Zoo and Zoo Idaho as well as all the other

actions they have taken. These should be part of the main report where they could have been discussed in detail.

My first impression is that Zoo management dilly dallied around trying to run out the clock before releasing their final report. The main report is almost identical to the 30-day report they sent to the AZA a full six months earlier. There are some systemic issues that I laid out in detail in my report "Idaho Falls Zoo - None Dare Call It Safe" but these were not addressed. To briefly summarize, Instead of an independent investigation trying to find the root cause it was a partisan self-serving investigation trying to find a scapegoat and once they did, they just started shopping in the "Administrative Control Store" picking out a few things they could easily implement and then declaring victory saying that they made the zoo safer! #BADWRONG.

The report should have specified the qualifications of the authors:

What system safety analysis expertise, what worker safety expertise, what accident investigation expertise, what root cause analysis expertise, what incident response expertise, etc. The report should discuss why they decided that they could do a better job than an independent review by outside experts. The report should describe their accident investigation process and why they stopped at just identifying the immediate direct cause/s. The report should have described how and why they decided on reviews by Zoo Boise, Zoo Idaho and GRAZE. Zoo Idaho is not an accredited zoo. Zoo Boise had their own near fatal tiger attack. Both of them only spent minimal time and Zoo Idaho did not even provide a report. GRAZE's motto is "Bringing mental health support to the zoo and aquarium industry" and the founder was a veterinarian technician. Hardly a safety background. GRAZE advertises over 30 years of experience. Not much considering I had 30 years' experience 25 years ago. The report should have described in detail the accident reporting.

Transmittal letters to the AZA and the USDA/APHIS should have been provided. It might explain why the USDA/APHIS didn't follow up until 5 months later and to my knowledge the AZA has yet to make a site visit. Why they decided to not inform the public initially and only informed the media months later should be explained. If a near death experience with a very real possibility of a lion escape does not warrant public notice what would? A dead body! The executive summary report lists quite a few changes. But there is no discussion of why they were chosen. What other changes were considered but not implemented. Why were no engineered safety measures considered? Why were more robust and resilient administrative controls not discussed or implemented? Items like alarms, flashing lights, and checklists for example. Most of the changes the zoo have made do not address the direct causes of the accident which were inattentiveness (distraction) and failure to follow procedures. And to paraphrase the previous quote: tactics without strategy end in failure. -Sun Bob :)

The report says nothing about the fact there were no shotgun team members available to respond to the event. The event could have had two people at risk. I have little doubt that if the keeper with the bloody finger had been in the exhibit that the lion would have smelled blood and attacked him! The Zoo should have described the steps they are taking to see that this lack of response personnel does not happen again. They should also have determined if the response time is even quick enough with the shotguns located in different buildings. The admin building to the sloth bear exhibit is about as far away as you can get at the zoo. The hospital to the Tiger exhibit is close but it would be a few minutes longer than if the gun was in the tiger building. They should have a shotgun available at each apex predator building. Time is critical. Maybe one bite away : (

The Report says abruptly that the “incident was the result of human error.” This kind of vague overarching cause is not actionable. It is kind of like going to the doctor and hearing the doctor say you are sick: way too vague to be of much use. Furthermore, the only way to prevent human error would be to get rid of the people!

The report says nothing about who reviewed the final report nor who approved it.

Arguably one of the biggest oversights is the failure to include engineered safety measures as an integral part of the corrective action. The corrective action team should have consisted of STEM peoples: Physics, Technology, Engineering and Math. These peoples could devise and implement changes that would either make it physically, mechanically, electrically or electronically impossible to have personnel and apex predators in the same space at the same time. There are so many old and new technologies available: wireless sensors, limit switches, interlocks, cameras, tracking devices etc. that could be installed to increase the safety by orders of magnitude.

What the Zoo has proposed could have been done by liberal arts majors: English for procedures, Art for signs and Theatre for lighting!

I will go out on a limb and state: Paint never stopped an apex predator attack!

That is probably all I should need to say but I will point out a couple of other things. The report says the keeper took the water container from the exhibit to the building to fill it. That was not true then, nor was it true the many years I was there. The water container is a heavy stainless-steel container with no handles, just

a couple of hooks to hook onto the cage wall. It was typically filled by a 5-gallon plastic bucket that resided in the big cat building. There have been times in the past when a hose was run from the building faucet to the exhibit water container, but the container was never carried down to the building and back.

The report says I knocked on the cat building door after the incidence. That is not true. I collapsed on the hillside on the outside of the exhibit and the keeper showed up a few minutes later. There is a mystery of the keeper's actions during the lion encounter. It only takes a minute or two to fill a five gallon bucket of water.

The report has a figure 7 "Outdoor Lion Yard. A yellow dotted circle indicates where interaction between lion and volunteer occurred". The circle is on the wrong side of the figure. The encounter happened on the left (south) side not the north side. The lions are south and east side poopers.

The LIES says that "Zoo Staff and volunteers were informed" which did not appear in the main report. Further the volunteers were not initially informed. As a matter of fact, only those who attended the July 3rd volunteer meeting were told anything.

The executive summary also mentions consideration of a bean bag gun with no discussion. While a less lethal weapon might sound attractive from the apex predator point of view, if someone is being attacked, just driving the predator away is not helpful. There is no way to remove the victim with the predator present and time is of the essence. I am sure the police would disagree with the hesitancy to use lethal force when under attack.

The Executive Summary also dismisses bear spray as a viable requirement: saying offhand that it is not always effective. While

that is probably true, it would apply to any mitigative action. There is a polar bear study which shows an extremely high success rate of 95%. Polar bears are much larger, and I would suspect are equally fierce! So, until there is a better proven mitigation it would seem unwise not to require bear spray. Here are a couple of references

<https://wildlife.onlinelibrary.wiley.com/doi/10.1002/wsb.1403>

Efficacy of bear spray as a deterrent against polar bears.

And

<https://wildlife.onlinelibrary.wiley.com/doi/full/10.1002/jwmg.21958>

An Investigation of Factors Influencing Bear Spray Performance

“Our results provide no compelling reason to not carry bear spray in all areas where bears occur, even if it is windy or cold.”

The summary has the following nonsensical sentence:

“About every 6 weeks, in the daily morning meetings, safety, incident reports, and the critical importance of reporting is emphasized in the day morning meetings.”

Ultimately the zoo still has only administrative controls to prevent a lethal event from happening. They have installed no engineered safety features. As such, human nature being what it is, it is only a matter of time until another incident happens. This is also compounded somewhat by the turnover rate for Area 4 keepers, especially relief keepers. The people that work there and the public that visits deserve better.