



August 12, 2013

Public Comments Processing
Attn: FWS-R9-ES-2010-0086
Division of Policy and Directives Management
U.S. Fish and Wildlife Service
4401 N. Fairfax Drive, MS 2042-PDM
Arlington, VA 22203

Via rulemaking portal

Re: NAPSA Comment on proposed rule and 12-month petition finding to list all chimpanzees as endangered (Document ID FWS-R9-ES-2010-0086-12977)

To Whom It May Concern:

The North American Primate Sanctuary Alliance (NAPSA) was founded by the leaders of the chimpanzee sanctuary community in 2010. NAPSA is a working group of established sanctuaries that provide exceptional lifetime care to chimpanzees and other animals. NAPSA was formed to share information, resources, policies and procedures, and experience in an effort to increase the success of each member sanctuary. NAPSA also serves as a central point of contact and expertise for issues relating to captive chimpanzees and other primates while working with interested parties to implement retirement of research, pet and entertainment primates. Each member sanctuary is licensed and inspected by the United States Department of Agriculture (or its Canadian equivalent), licensed by relevant state and county authorities, and fully accredited by the Global Federation of Animal Sanctuaries.

Member sanctuaries include:

- Center for Great Apes, Wauchula, FL
- Chimpanzee Sanctuary Northwest, Cle Elum, WA
- Chimp Haven, Keithville, LA
- Chimps, Inc., Bend, OR
- Cleveland Amory Black Beauty Ranch, Murchison, TX
- Fauna Foundation, Carignan, Quebec, Canada
- Primate Rescue Center, Nicholasville, KY
- Save the Chimps, Fort Pierce, FL

NAPSA supports the proposed rule to list all chimpanzees as endangered under the Endangered Species Act. This change is necessary to promote the conservation of the species and to protect them from further and ongoing exploitation. As the

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primary caregivers of a population of over 600 chimpanzees, we see and deal with the effects of current exploitation every day. Chimpanzees are harmed and exploited in various industries including the pet trade, the entertainment industry, and the invasive research industry, and this is to the detriment of the species. This proposed rule change would help reduce this exploitation and allow the public to have the legally required notice and opportunity to comment on any permits being requested. As members of the public and experts in the field, NAPSA sanctuary staff will submit comments on any proposed permits that would allow a take of a chimpanzee under the Endangered Species Act and this new proposed rule.

Regarding the potential effect that this rule change may have on the existing population of chimpanzees in the United States, NAPSA has stated before and states again here that with appropriate financial commitment for lifetime care, logistical arrangements and construction/renovation of housing, NAPSA has the expertise to maintain the entire community of privately- and government-owned chimpanzees currently in U.S. facilities.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sarah Baeckler Davis', written in a cursive style.

Sarah Baeckler Davis, JD

Executive Director

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