



Wild Horse Education

DRAFT

WHE Comprehensive Animal Welfare Program Team Assessment Report Conditions Found to be in Non-Compliance with the CAWP Standards for WH&B Gatherers

Dated: August 12, 2024

Gather Name: 2024 Blue Wing Complex Wild Horse and Burro Gather - Nevada

Wild Horse Education: CAWP Team on-site Colette Kaluza, Marie Milliman, off-site/on-site Laura Leigh

Wild Horse Education Assessment Dates: July 8 – July 31, 2024

Gather Operation: July 8 – July 31, 2024 [Daily Gather Reports](#)

Bureau of Land Management (BLM) District/Field Office: BLM Winnemucca District Office, by the Humboldt River Field Office. Titles: (IC) Incident Commander or (PI) Project Inspector; (COR) Contracting Officer's Representative

(Blue Wing Mountains HMA, Kamma Mountains HMA, Lava Beds HMA, Seven Troughs HMA, Shawave Mountains HMA, Antelope Range HA, Eugene Mtns HA, Selenite Range HA, Trinity Range HA and the Truckee Range HA.)

Gather Goal: Gather 1,373 wild horses & 365 burros, remove approximately 1,729 excess wild horses & burros. Once gather operations are completed, approximately 539 wild horses & 120 burros will remain in the Complex. The gather is expected to last approximately 30 days. Complex contains approximately 2,283,300 acres of unfenced public lands.

Intake Facility: All horses identified for removal and 77 burros will be transported to the Indian Lakes Off-Range Corrals, located in Fallon, Nev., the remaining burros will be transported to Axtell Off-Range Corrals in Axtell, Utah.

Approved Operation Dates: Monday, July 8 - August 18, 2024.

BLM Incident Commander IC/PI: Garrett Swisher

BLM Lead COR: Garrett Swisher

BLM COR (trap): Rotational – Ruth Thompson, Sadie Leyba, and those unknown.

BLM COR (temporary holding): Rotational – Tami Howell, Tyler Reese, and those unknown.

BLM Public Affairs: Rotational – Heather O'Hanlon, Lisa Reid, Heather Tiel-Nelson, Randy Martin.

Contractor: Warner Livestock

Gather Method: Helicopter Drive Trapping

BLM Gather Reason: DOI-BLM-NV-W010-2015-0034-EA Blue Wing Wild Horse and Burro Gather Plan-EA decision signed 10/23/2017.

BLM CAWP Team Assessment Dates: July 18-19

DRAFT General Notes and Comments from Wild Horse Education CAWP Team:

WHE CAWP Team is trained in humane handling of WH&Bs. Our team lead underwent CAWP training by BLM. We were not granted access to temporary holding corral for a tour to assess the condition of the animals freshly captured prior to being shipped to facilities closed off to public viewing.

We submit this preliminary draft report as a preview of BLM's non-compliance with its own CAWP standards and some additional assessment and recommendation notes. It will take time to assess and compile the full list, including dates, photos, and details contained in our full report once finalized. WHE reports are prepared by our experienced team of volunteers to accurately portray the inhumane conditions at this gather under the supervision of Laura Leigh.

Lack of transparency: We were informed that throughout the gather horses were trailered from trap site to temporary holding corral and standard protocol is to be loaded the next morning onto semi truck and transported (shipped) to off-range corral. At no time was public observation allowed to view freshly-captured animals at temporary holding corral, including the loading of horses onto semi trucks.

We were informed that periodically wild horses were loaded onto stock trailers from trap site (unsorted by sex), unloaded, re-loaded onto a semi truck (positioned down the road from trap site) where horses stood at a standstill (for not more than three hours) before being transported (but we cannot confirm as observation was not permitted), unloaded at temporary holding corral... "for expediency" as justification.

Throughout the operation access to observe trapping (and even wild horses and burros on trailers) was extremely limited.

The day after the BLM CAWP Team left the gather to write its assessment report, at a new trap a horse broke its neck running into a panel at a sharp curve in the trap panels, use of an electric prod on a horse (would not get up off the floor of a stock trailer), a mare was found deceased on truck upon arrival at holding, mare died due to blunt force trauma caused by a horse kicking her in the head, while semi truck was used when temperature reached 97 degrees (before 11:00 am). BLM has a bad habit of misaligning the floor of semi truck with the loading chute creating risk of leg injury during loading. Yet this trap was most frequently utilized (seven days July 20 – 25, July 31) and never modified to reduce risks. This trap was unseen by BLM CAWP team as they only list two days of onsite attendance.

Public is not allowed at destination facilities Indian Lakes and Axtell except for rare BLM-conducted "tours" because they are private off-range corrals, so private they are not even listed on BLM's website.

Gather completion totals (as published by BLM)

Captured: 1,665

1,305 Wild Horses (536 Stallions, 544 Mares, and 225 Foals)

360 Wild Burros (186 Jacks, 152 Jennies, and 22 Foals)
Shipped: 1,620
1,268 Wild Horses (513 Stallions, 530 Mares, and 225 Foals)
352 Wild Burros (183 Jacks, 147 Jennies, and 22 Foals)
Escaped (released): 3
Deaths: 42

Gather concluded August 1, 17 days ahead of approved timeframe.

WHE Welfare and CAWP Team Assessment Report

Conditions observed to be found to be in non-compliance with the CAWP Standards for Wild Horse and Burro Gathers and broadly accepted veterinary practice:

Facility Design: Trap Site and Temporary Holding Facility:

Standard: I.A.2

The trap site should be moved close to WH&Bs locations whenever possible to minimize the distance the animals need to travel.

Non-Compliance: Some traps were repeatedly utilized, for example, seven days altogether, six days consecutively, instead of moving trap site causing animals to travel far with repeated pressure in the same areas during heat danger incidents and air quality warnings. Traps were used repeatedly to the point where the pilot had trouble even finding horses and burros.

Facility Design: Trap Site and Temporary Holding Facility:

Standard: I.A.8

Padding must be installed on the overhead bars of all gates and chutes used in single file alleys.

Non-Compliance: At every trap site horses go through 4'-wide gates to load onto trailers, and there is a single-file alley in between that should have padding installed on the overhead bars at gates. Padding at trap was nonexistent at one set of trap corrals and inadequate and in disrepair at the second set of trap corrals. 7-16-24 figure 12

Facility Design: Trap Site and Temporary Holding Facility:

Standard I.A.13.b:

All gates and panels in the animal holding and handling pens and alleys of the trap site must be covered with materials such as plywood, snow fence, tarps, burlap, etc. approximately 48" in height to provide a visual barrier for the animals. All materials must be secured in place. (major)

- b. For alleys and small internal handling pens, material covering panels and gates should extend from no more than 12 inches below the top of the panel or gate toward the ground to facilitate visibility of animals and the use of flags and paddles during sorting. (minor)

Non-Compliance: The tarps entirely covered the panels or gates. Tarps were 72" in height, not 48". (Standard I.A.4.: Fence panels in pens and alleys must be not less than 6 feet high for horses.) The tall tarp was opaque, usually not secured in place, caught in the wind and flapped. The tarp seemed to interfere with contractor's ability to work the animals. Ends of the flag handling aids were seen being used in a stabbing motion toward the horses' heads, paddles used to hit horses in the head, maybe out of frustration because of obstructed vision. In addition, traps were usually maximally loaded because pilot brought in big numbers of horses in each run further obstructing clear view from ground level.

Oversized, opaque, unsecured flapping tarps attached to panels on the sorting alley pathway where wranglers move horses to load onto stock trailers appeared to cause flightiness in horses and pose undue risks to horses, and interfere with the ability of wranglers to safely move horses due to a lack of direct visibility (without climbing on a panel). In one instance, windblown and unsecured tarps appeared to play a role in a broken neck. 7-16-24 figure 12

Facility Design: Trap Site and Temporary Holding Facility:

Standard I.A.13.c:

The initial capture pen may be left uncovered as necessary to encourage animals to enter the first pen of the trap.

AND Handling: Willful Acts of Abuse:

Standard: IV.A.3

There should be no deliberate driving of WH&Bs into other animals, closed gates, panels, or other equipment.

Non-Compliance: WHE was allowed to inspect the trap never used before, but repetitively used during this gather (7 x), and it revealed a high-risk trap for horses. The initial capture pen was left uncovered, but anyone could see, layman or expert, the quick left turn and narrowness of the pen was dangerous for the horses being driving in by helicopter. The turn, combined the apparent use of "dust up" as a tool used by the pilot to drive horses into the trap, created the potential for preventable injury and death. Horses have bad depth perception and with the sudden turn, compounded by lack of dust control, the area presented a high collision risk. Reportedly, a horse jumped over the panel at trap at the turn and bent it the day before, and a horse died due to broken neck from running into a panel at trap a few days before. 7-23-24 figure 1



Figure 1

Facility Design: Loading and Unloading Areas:

Standard: I.B.6

Trailers must be properly aligned with loading and unloading chutes and panels such that no gaps exist between the chute/panel and floor or sides of the trailer creating a situation where a WH&B could injure itself.

Non-Compliance: Trailers were misaligned with loading chute creating a gap between semi truck and loading chute floor threshold. At trap used during this gather (7 x), semi truck was parked on road between trap site and temporary holding corral for unloading horses from trap and re-loading onto semi truck for transport to temporary holding corral. 7-25-24 figure 2



Figure 2.

Capture Technique: Helicopter Drive Trapping:

Standard II.B.1.

The helicopter must be operated using pressure and release methods to herd the animals in a desired direction and should not repeatedly evoke erratic behavior in the WH&Bs causing injury or exhaustion. Animals must not be pursued to a point of exhaustion; the on-site veterinarian must examine WH&Bs for signs of exhaustion.

Non-Compliance: During many runs there were multiple, aggressive, attempts to drive horses to the trap. These multiple attempts included bands with small foals.

Continued engagement in this activity shows the CAWP guidance inadequate. The Lead COR/COR/PI forsake this directive for animal safety for the sake of reaching gather number goal quicker, even though this is a major infraction.

This small band is chased relentlessly and brought into the trap as temperatures hit the mid 90s and the Heat Index teeters at the danger zone. 7-16-24 figure 3 <https://videopress.com/v/SqG41oRV>

Throughout this roundup BLM has been relentlessly pursuing wild horses/burros that not only live inside Herd Management Areas (HMAs), but also in areas just outside the boundary and in Herd Areas (lands designated for horse and burro use but BLM says they can't manage in those areas).

Video was split into two parts. Band relentlessly pursued, escaped trap, pursued again, and finally, let go. 7-17-24 figure 4 <https://videopress.com/v/pD89LjAQ> <https://videopress.com/v/doJDkhBj>



Figure 3



Figure 4

Capture Technique: Helicopter Drive Trapping:

Standard II.B.4.

When WH&Bs are herded through fence line en route to the trap, the Lead COR/COR/PI must be notified by contractor. The Lead COR/COR/PI must determine the appropriate width of the opening that the fence is let down to allow for safe passage through the opening. The Lead COR/COR/PI must decide if existing fence lines require marking to increase visibility to WH&Bs.

Non-Compliance: WHE was allowed to inspect the trap and noted that BLM has allowed barbed wire fencing be part of the wing of the trap, and this existing fence line was not marked.

Livestock infrastructure with barbed wire fencing was adjacent to trap site (wings with t-posts draped with jute). BLM did not set limitations on distance nor consider the barbed wire fences.

Leaving this to COR/IC/PI discretion creates repeated and unnecessary risks to WH&Bs. 7-16-24 figure 5 <https://videopress.com/v/VsVRznpv>



Figure 5

Capture Technique: Helicopter Drive Trapping:

Standard II.B.6.

WH&Bs may escape or evade the gather site while being moved by the helicopter. If there are mare/dependent foal pairs in a group being brought to a trap and half of an identified pair is thought to have evaded capture, multiple attempts by helicopter may be used to bring the missing half of the pair to the trap or to facilitate capture by roping. In these instances, animal condition and fatigue must be evaluated by the Lead COR/COR/PI or on-site veterinarian on a case-by-case basis to determine the number of attempts that can be made to capture an animal.

AND Capture Technique: Roping:

Standard II.C.1.

The roping of any WH&B must be approved prior to the procedure by the Lead COR/COR/PI.

AND Capture Technique: Roping:

Standard II.C.2.

The roping of any WH&B must be documented by the Lead COR/COR/PI along with the circumstances. WH&Bs may be roped under circumstances which include but are not limited to the following: reunite a mare or jenny and her dependent foal; capture nuisance, injured or sick WH&Bs or those that require euthanasia; environmental reasons such as deep snow or traps that cannot be set up due to location or environmentally sensitive designation; and public and animal safety or legal mandates for removal.

AND Handling: Willful Acts of Abuse:

Standard: IV.A.1

Hitting, kicking, striking, or beating any WH&B in an abusive manner is prohibited.

Non-Compliance: There were numerous instances of horses/burros being subjected to all of the prohibited abusive actions.

Ropings of adult horses/burros were routine and brutal events throughout this gather. The roping of any WH&B must be approved prior to the procedure **The roping of any WH&B must be approved prior to the procedure. I.C./P.I. in charge simply cited ropings are within his discretion. The ropings were to achieve AML (Appropriate Management Level), which is not within the standards.**

Wranglers were obviously given liberal liberty to do routine and large-scale ropings. In one instance four wranglers on horseback, along with the helicopter pursued a single horse. On another day at least three ropings were occurring simultaneously in a chaotic and unorganized fashion.

Last run of the day a burro makes an escape attempt. They could have let him go, this is not supposed to be a "zero out." Instead, as temperatures soared in record-breaking heat, a ruthless pursuit is undertaken. The quality of the video (due to distance) is poor. But you can see just how rough staff is on this burro. There were three ropings that day, we could only see one. BLM in charge emphatically stated they "approved" the conduct because getting this burro in this blazing heat was one more removed to achieve AML... with no mention of the welfare of the burro. A burro died in the trailer this day be-

tween trap site and temporary holding corral. 7-9-24 <https://videopress.com/v/4MTMq3fb> (It appeared that a burro was being beaten after being roped.)

Use of ropes by wranglers were repeatedly mishandled to choke out horses to collapse, and it appears at least one of these animals eventually succumbed to a broken neck and collapsed on a stock trailer (this horse was repeatedly choked, collapsed, laid on the ground unmoving, kicked in the body and head, dragged to its feet by the wrangler on horseback using the rope.) <https://wildhorseeducation.org/2024/07/31/blue-wing-7-30-update-nearing-the-end-social-media-chaos/>

A video that shows a horse being roped appears to be choked, collapsing and being terribly roughed up before being dragged by the neck with a rope to standing, and kicked in the body and head. 7-26-24 figure 6 <https://videopress.com/v/NGavM5zQ>

A video of a horse banging its head on a trailer and breaking its neck. We have reason to believe the horse in the video is the same horse in the video being roped and yanked. There was likely a fracture during the yanking with the rope that led to the collapse on the trailer. 7-26-24 figure 7 <https://videopress.com/v/S00Xf4EK>



Figure 6



Figure 7

Capture Technique: Helicopter Drive Trapping:

Standard II.B.7.

Horse captures must not be conducted when ambient temperature at the trap site is below 10 F or above 95 F without approval of the Lead COR/COR/PI. Burro captures must not be conducted when ambient temperature is below 10 F or above 100 F without approval of the Lead COR/COR/PI. The Lead COR/COR/PI will not approve captures when the ambient temperature exceeds 105 F.

Non-Compliance:

The parameters set are guidelines, that must be used to evaluate all variables. The BLM COR onsite seemed to believe that he only had to stop at the extreme of the guideline without any understanding that additional variables needed to be taken into account. The “discretion” to protect welfare was absent and the limit pushed only to rush to meet a quota. (Demonstrated by the early end date of the operation and admission that this was the reason the COR was allowing operations to push reasonable limits on health and safety to allowable extremes.)

Onsite IC/COR repeatedly stated that his limit was 105 degrees and numerous days pushed well over 95 degrees by the time operations ended.

Capture Technique: Helicopter Drive Trapping:

Standard II.B.2.

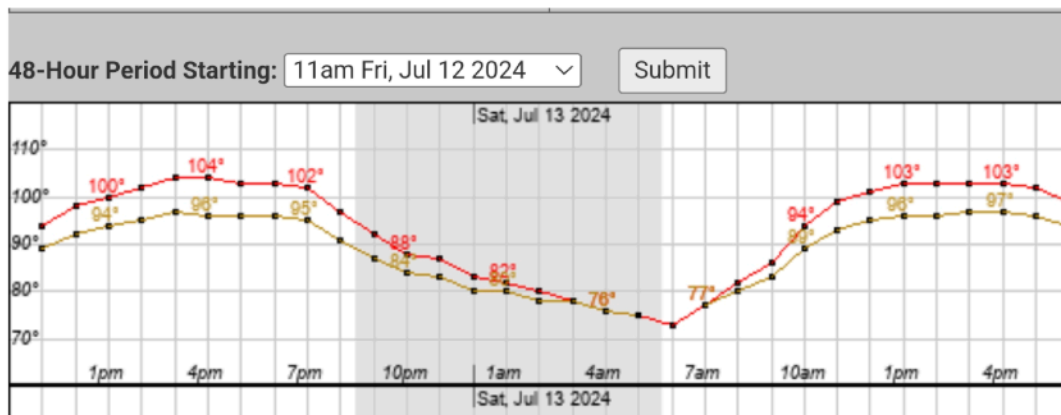
The rate of movement and distance the animals travel must not exceed limitations set by the Lead COR/COR/PI who will consider terrain, physical barriers, access limitations, weather, condition of the animals, urgency of the operation (animals facing drought, starvation, fire, etc.) and other factors.

AND Capture Technique: Helicopter Drive Trapping:

Standard II.B.2.b.

The appropriate herding distance and rate of movement must be determined on a case-by-case basis considering the weakest or smallest animal in the group (foals, pregnant mares, or horses that are weakened by body condition, age, or poor health) and the range and environmental conditions present.

Non-Compliance: BLM did not take into account air quality, temperature, distance of travel, or case-by-case basis considerations. *Figure 8*



Example (red line temperature, yellow heat index): On July 12 and 13 the heat index was over 70 (when young and old horses need extra cooling time) and rose well above 90 (when even performance grade horses struggle to regulate heat during even mild exertion). This event lasted 8 days where nighttime heat index did not even provide relief. None of these factors were considered as maximum temperatures in the “guideline” were pushed to reach “AML” without measuring discretion to provide any effort toward “humane capture.” During just the timeframe illustrated above there were 2 acute heat related deaths: 5-year-old, Gray jenny died due to Colic. 2-year-old, Pinto jenny found deceased on truck upon arrival at Indian Lakes Off-Range Corrals.

Mare trying to protect her young one that does not want to go into trap is relentlessly pursued as any other horses. 7-17-24 figure 9 <https://videopress.com/v/eVN00yfQ>

Mare trying to escape with her tiny foal is pushed away from her baby. She collapses 3 times in the relentless pursuit. We saw wranglers also go after her foal. We do not know if either of them are still alive. 7-17-24 figure 10 <https://videopress.com/v/pQtM6RYh>

From the beginning of this gather to the conclusion, every day wild horses/burros and babies were seen exhausted, lagging behind, and many times roped. On numerous instances babies would fall off, bands were being driven fast, and I never saw the babies again. Also, wranglers were roping adults and bringing them in, not so much babies.



Figure 9



Figure 10

Capture Technique: Helicopter Drive Trapping: Standard II.B.2.a.

WH&Bs that are weak or debilitated must be identified by BLM staff or the contractors. Appropriate gather and handling methods should be used according to the direction of the Lead COR/COR/PI.

Non-Compliance: Instances where injured wild horses were brought into trap demonstrated no deviation from capture techniques employed for non-injured.

Capture Technique: Helicopter Drive Trapping:

Standard II.B.2.c.

Rate of movement and distance travelled must not result in exhaustion at the trap site, with the exception of animals requiring capture that have an existing severely compromised condition prior to gather. Where compromised animals cannot be left on the range or where doing so would only serve to prolong their suffering, euthanasia will be performed in accordance with BLM policy.

Non-Compliance: Pursuit to exhaustion was noted numerous times during this operation including numerous horses collapsing during roping after pursuit by helicopter.

Wild Horse and Burro Care: Dust Abatement:

Standard: III.B.2.a.

Dust abatement by spraying the ground with water must be employed when necessary at the trap site and temporary holding facility.

Non-Compliance: Dust abatement was rarely done, and appeared to be used as a tool to push horses toward the trap site (makeshift corral) causing a complete dust out at trap making it difficult and dangerous conditions for animal and people. Wild horses are run into the trap and the entire gather area disappears in dust. There was no dust control. On this run a band blew through the trap wings in the dust out. 7-31-24 figure 11



Figure 11

Handling: Willful Acts of Abuse:

Standard: IV.A.4

There should be no deliberate slamming of gates and doors on WH&Bs.

Non-Compliance: Gates were deliberately slammed on WH&Bs.

Handling: Willful Acts of Abuse:

Standard: IV.A.5

There should be no excessive noise (e.g., constant yelling) or sudden activity causing WH&Bs to become unnecessarily flighty, disturbed or agitated.

Non-Compliance: Ice chests, chairs, etc., for crew were placed next to corral at trap site holding freshly-captured horses likely caused undue disturbance to horses. (Contractors park their vehicles in another area. We would hate to insinuate that the they should not be drinking, they need to hydrate, but they should keep their coolers where they park their vehicles.) 7-16-24 figure 12.



Figure 12

Handling: Handling Aids:

Standard: IV.C.1

Handling aids such as flags and shaker paddles must be the primary tools for driving and moving WH&Bs during handling and transport procedures. Contact of the flag or paddle end of primary handling aids with a WH&B is allowed. Ropes looped around the hindquarters may be used from horseback or on foot to assist in moving an animal forward or during loading.

Non-Compliance: You can see some of the loading at trap. (In addition to excessive hot shot use) we observed baggie whips coming in contact with horses repeatedly, a whip turned around backwards to prod the horse with the handle, and the paddle was used to strike horses in the heads, necks and the face. The horse in the video reacts by repeatedly rearing up. It appears there were a few instances where “baggy whips” were turned around to poke horses, paddles striking heads and necks. 7-16-24 figure 13 <https://videopress.com/v/7JkPRzC4>



Figure 13

You can see the wings of the trap use old barbed wire livestock fencing and corrals as part of the infrastructure. 7-16-24 figure 14 <https://videopress.com/v/VsVRznpv>



Figure 14

Handling: Handling Aids:

Standard: IV.C.2

Electric prods must not be used routinely as a driving aid or handling tool. Electric prods may be used in limited circumstances only if the following guidelines are followed:

- c. Must only be used after 3 attempts using other handling aids (flag, shaker paddle, voice or body position) have been tried unsuccessfully to move the WH&Bs.
- h. Any electric prod use that may be necessary must be documented daily by the Lead COR/ COR/PI including time of day, circumstances, handler, location (trap site or temporary holding facility), and any injuries (to WH&B or human).

Non-Compliance: 7-16-24 It has been confirmed a hot shot was used today because “a horse would not go in.” From our video it appears the hot shot was used repeatedly on numerous horses on every attempt to load.

Transportation: General:

Standard: V.A.6

WH&Bs should not wait in stock trailers and/or semi-trailers at a standstill for more than a combined period of three hours during the entire journey.

Non-Compliance: BLM in charge was concerned about expediency when using the semi truck along with the added risk of unloading, reloading horses onto a semi truck, and stockpiling horses on semi truck in smoke and heat conditions and added a layer of risk to animals for BLM convenience.

Facility Design: Loading and Unloading Area: Standard: I.B.7

Stock trailers should be positioned for loading or unloading such that there is no more than 12” clearance between the ground and floor of the trailer for burros and 18” for horses.

Non-Compliance: Stock trailers were sometimes too high from the ground for horses, particularly foals, to safely load at many of the trap sites. At one trap accessed, it was observed that no trench had been dug to lower the back of trailer even when loading was occurring on an incline increasing height of trailer floor instead of decreasing.

ACCESS AND TRANSPARENCY: This report should be read considering our access and ability to observe all aspects of the gather were extremely limited. Distance to trap from observation was over 2 miles at more than one location, even though there were numerous safe observation locations. BLM access restrictions did not meet the “narrowly tailored” parameters of First Amendment Rights. There was no access to the temporary corrals.

This report indicates that severe issues were present at both trap and holding (where the majority of compliance standards would apply).

CONCLUSION:

BLM Nevada CAWP Team gave a final CAWP Assessment Rating of Excellent and that 99% of applicable CAWP standards were met.

The BLM CAWP team was onsite July 18-19.

On these two days a horse had a heart attack during transport. BLM record keeping included a euthanasia for a broken leg not listed as acute. 8 horses in total died while the BLM CAWP team was present, most from non-fatal conditions where the horse could be transported to holding and adopted. BLM noted a horse with a body score "1" that they euthanized (a body score "1" is literally a weak walking skeleton). Although documenting such a horse is required in CAWP rules, to date BLM has not documented the condition of such horses and the BLM CAWP assessment never addresses deficits in record keeping.

We sent a letter prior to the start of this operation asking that the BLM CAWP team recommend BLM postpone the roundup due to the heat event that would hit on July 1 and last until approximately the 15th. The CAWP team came after the heat event ended.

The only issue the BLM CAWP team found was that loading had begun in the dark one morning.

This is the entire summary of BLM's official oversight team, CAWP:

General Notes and Comments from the CAWP Team: Coordination with Nevada and the Winnemucca District was excellent. The gather team was available to the CAWP Team to answer any questions and to provide access to the gather. Communication between the gather team (BLM, APHIS, and the contractor) was excellent. All gather team members knew what their job was and completed it efficiently. The handling of wild horses at the trap, temporary holding corral, and during transportation was outstanding and done in a quiet, calm, and relaxed manner creating an atmosphere that was supportive in providing excellent care, handling, and treatment of the wild horses. All wild horses always had food and water at the temporary holding corral. Multiple gather team members were observed checking ambient temperatures multiple times at the trap site, discussing weather conditions, and relaying information about ambient temperatures to other gather team members. Gather operations were stopped before exceeding 95°Fahrenheit. The care, handling, and treatment of the wild horses was a priority for all involved in this gather.

It has been our experience that the BLM CAWP team only goes out to create a document to whitewash the concerns of the public. The CAWP team usually arrives only when BLM knows there is active litigation (like at Blue Wing) and/or media attention falls on the operation due to public outrage.

Every single time, the CAWP report is not a document to rectify issues; it is a document condoning and praising. Figure _____

From: Bertola, Jerrie A
To: Waddell, Holle; Lutterman, Jason W; Tiel-Nelson, Heather J; Strauss, Toni L; Lemmond-Martinez, Kelly J; Camacho, Serena T; Crabb, Michelle L; McConnell, Daryl (Lee); Rushing, Preston T; Ruhs, Amy G; Lierman, Krystle A; Kueck, Meredith A; albert.j.kane@usda.gov; McGuire, Paul M; Griffin, Paul C; Fluor, Scott L; Neill, John J; Bastian, Dona A; Morrow, Karen E
Subject: Re: Reno ABC: Wild horse advocates battle federal government over increased roundups
Date: Tuesday, February 1, 2022 2:42:38 PM
Attachments: image001.png

I think this also shows how and why it is important to have a support group. This program takes a beating all the time and I think its important that we all can be there for one another. During conversations over the past week my [REDACTED] said "Those people are just jealous that they haven't rescued as many horses that he has." I hadn't really thought about us as rescuing animals but in many cases we are doing just that as well as the other resources.

*Thank you,
Jerrie*

~~~~~  
Jerrie Bertola  
WHB Specialist  
CAWP Coordinator  
HQ-260  
jbertola@blm.gov  
( [REDACTED] )  
~~~~~

<https://www.blm.gov/programs/wild-horse-and-burro/comprehensive-animal-welfare-program>

From: Waddell, Holle <hwaddell@blm.gov>
Sent: Tuesday, February 1, 2022 1:08 PM
To: Lutterman, Jason W <jlutterman@blm.gov>; Tiel-Nelson, Heather J <hnelson@blm.gov>; Strauss, Toni L <tstrauss@blm.gov>; Lemmond-Martinez, Kelly J <klemmondmartinez@blm.gov>; Bertola, Jerrie A <jbertola@blm.gov>; Camacho, Serena T <scamacho@blm.gov>; Crabb, Michelle L <mcrabb@blm.gov>; McConnell, Daryl (Lee) <d2mconn@blm.gov>; Rushing, Preston T <prushing@blm.gov>; Ruhs, Amy G <aruhs@blm.gov>; Lierman, Krystle A <klierman@blm.gov>; Kueck, Meredith A <mkueck@blm.gov>; albert.j.kane@usda.gov <albert.j.kane@usda.gov>; McGuire, Paul M <PMcGuire@blm.gov>; Griffin, Paul C <pgriffin@blm.gov>; Fluor, Scott L <sfluor@blm.gov>; Neill, John J <jneill@blm.gov>; Bastian, Dona A <dbastian@blm.gov>; Morrow, Karen E <kmorrow@blm.gov>
Subject: RE: Reno ABC: Wild horse advocates battle federal government over increased roundups

Thanks Jason! Great example of how our increased efforts are NOT enough to some.

Thank you,

Holle' Waddell
Department of the Interior
Bureau of Land Management
Division Chief (Acting)
Division of Wild Horses and Burros, HQ-260
[REDACTED]

hwaddell@blm.gov

"When you can identify injustice, when you can identify inequality and unfairness, and you confront that, then in my mind you are doing justice." - Bryan Stevenson, Founder and Executive Director for the Equal Justice Initiative



The BLM CAWP team members keep themselves separated and confined near trap, never come up to designated observation spots to see what the public sees, never sit with the public, and even seem to hide the fact they are even present from the public. The BLM CAWP team were only present at this at operation for two days of the entire operation.

How the pilot is flying never seems to be assessed by BLM CAWP. Helicopter tail rotor comes dangerously close to horses and appears to touch the ground. Conduct like this that threatens human and animal safety has been found unsafe by the courts and by the NTSB. If it is allowed to continue, as seen at Blue Wing and not cited or reprimanded, it is unconscionable. 7-31-24 figure 15 <https://videopress.com/v/iW8kSOcl>

This represents the type of flying we often see during roundups that resulted in a [helicopter crash at Triple B Complex gather where the tail rotor hits the ground](#) in the same state (NV). "The National Transportation Safety Board determines the probable cause(s) of this incident to be: The pilot's failure to maintain clearance from terrain while maneuvering at a low altitude."



Figure 15

Recommendation:

The CAWP team assessments have not changed the way removals or holding facilities operate. Assessments through CAWP began after the draft standards were adopted in 2015. In 2021, after BLM failed to release any findings of those supposed assessments (gained through the published “self-assessment tool” when the standards were adopted in 2015), failed to release the findings and draft for public comment and adopted standards as “policy” in 2021 without the enforceability of formal rulemaking, the CAWP team has not succeeded in changing national death and injury rates during gathers or in holding facilities. The data has not shifted one decimal point.

In the nine years since CAWP standards were adopted, the program is an abysmal failure. In the 4 years of since a CAWP team lead was finally hired and BLM simply called the standards “Final Policy,” the taxpayer funding used for the CAWP team has not resulted in any change to national death, disease or injury statistics by even a decimal point.

Therefore, it is our conclusion:

The current CAWP team structure (where BLM employees evaluate their colleagues) must be dismantled and a new team of individuals from independent oversight organizations and members be chosen who have no connection to the internal social structure of BLM.

Date: 08/12/2024