

From: Joseph Stratton, BLM (FOIA p. 246)  
Subject: Pertinent to our CAWP discussion tomorrow  
Date: April 27, 2017 at 12:46 pm  
Importance: High

All, attached is a timeline document I asked Kahty (sic) Holcomb to put together last summer regarding moving forward with the CAWP program. Maybe it will facilitate some the discussion.

Attachments→

CAWP-ImplementationPlan-draft-2015-05-31→  
"Comprehensive Animal Welfare Program (CAWP) BLM Wild Horse and Burro Program, Proposed 4-Year Implementation Plan" (BLM REDACTED)  
"Comprehensive Animal Welfare Program (CAWP) Wild Horse and Burro Gathers-Standards, June 30, 2015"

←April 27, 2017:

BLM referenced the timeline document outlining next steps for the Comprehensive Animal Welfare Program (CAWP) related to the 2015 Wild Horse and Burro Gather Standards. However, the agency has not been transparent and redacted the "Proposed 4-Year Implementation Plan" from 2015.

From: Stratton, Joseph A.  
To: Bolstad, Dean D.; Waddell, Holly; Shepherd, Alan B.; Anna-Maria Fasley  
Subject: Pertinent to our CAWP discussion tomorrow  
Date: Thursday, April 27, 2017 12:46:36 PM  
Attachments: CAWP-ImplementationPlan-draft-2015-05-31.docx  
Importance: High

All, attached is a timeline document I asked Kahty Holcomb to put together last summer regarding moving forward with the CAWP program. Maybe it will facilitate some the discussion. joe

Comprehensive Animal Welfare Program (CAWP)  
BLM Wild Horse and Burro Program

Proposed 4-Year Implementation Plan  
Kathryn Holcomb, PhD  
Carolyn Stull, PhD  
University of California, Davis

YEAR 1	
Timeframe	Activity

**BLM says there are no reviews, emails, meeting notes, documents associated with CAWP until 2017.**

**In litigation, BLM has stated there are no "Assessment Tool" documents, data, emails referencing the tool or review from 2016 or 2017.**

b(5) DPP

ATTACHMENT 1: COMPREHENSIVE ANIMAL WELFARE  
PROGRAM FOR WILD HORSE AND BURRO GATHERS

STANDARDS

Developed by

The Bureau of Land Management  
Wild Horse and Burro Program

in collaboration with

Carolyn L. Stull, PhD  
Kathryn E. Holcomb, PhD  
University of California, Davis  
School of Veterinary Medicine

June 30, 2015

From: Holle' Waddell, Branch Chief, Wild Horse and Burro  
Program, BLM (FOIA p. 305)  
Subject: UPDATE:WHB IMs  
Date: January 29, 2018 at 3:24 pm

We have a large task ahead of us and by now you should have received the "Priority" IMs from Alan that are expected to be completed, meaning approved, by September 30, 2018. As discussed, drafts of IMs you are leading are to be completed and ready for circulation by April 1, 2018. I will send the IM template received October 2017 by Robert Williams, BLM directives staff, to all as well. Remember Anna-Maria will be the POC for the directives/IM process so feel free to reach out to her with any questions.

UPDATE: WHB IMs Hello all! As previously stated, the program is in the process of updating/revising/developing guidance. The attached list identifies the IMs, who has been assigned to lead the effort and due dates. We will be discussing the following:

- \* Status Updates re: IMs you are leading
- \* Tentative dates (Due Dates)
- \* Questions on what is needed
- \* Next steps

←January 29, 2018:

Regarding updates to the BLM Wild Horse and Burro Program, Holle Waddell, the BLM Branch Chief, appeared intent on expediting the drafting and circulation of new Instruction Memorandums (IMs) establishing policy, with little regard for fulfilling the purpose of the Comprehensive Animal Welfare Program (CAWP) – namely, the humane treatment and handling of wild horses and burros.

Delegating this critical responsibility to Anna-Maria Easley, reflecting a troubling pattern of prioritizing the appearance of protection over the actual protection of these animals.

**From:** Google Calendar [mailto:[calendar-notification@google.com](mailto:calendar-notification@google.com)] On Behalf Of [hwaddell@blm.gov](mailto:hwaddell@blm.gov)  
**Sent:** Monday, January 29, 2018 3:24 PM  
**To:** [gwarr@blm.gov](mailto:gwarr@blm.gov); [jneill@blm.gov](mailto:jneill@blm.gov); [sfluer@blm.gov](mailto:sfluer@blm.gov); [jstratto@blm.gov](mailto:jstratto@blm.gov); [ashepherd@blm.gov](mailto:ashepherd@blm.gov); [ameasley@blm.gov](mailto:ameasley@blm.gov); [mkuerek@blm.gov](mailto:mkuerek@blm.gov); Kane, Albert J - APHIS <[Albert.J.Kane@aphis.usda.gov](mailto:Albert.J.Kane@aphis.usda.gov)>; [jutterman@blm.gov](mailto:jutterman@blm.gov); [hwade@blm.gov](mailto:hwade@blm.gov); [dacollin@blm.gov](mailto:dacollin@blm.gov); [pgriffin@blm.gov](mailto:pgriffin@blm.gov)  
**Subject:** UPDATE: WHB IMs

Hello all and thanks to everyone that participated during today's IM update/discussion. We have a large task ahead of us and by now you should have received the "Priority" IMs from Alan that are expected to be completed, meaning approved, by September 30, 2018.

As discussed, drafts of IMs you are leading are to be completed and ready for circulation by April 1, 2018. I will send the IM template received October 2017 by Robert Williams, BLM

directives staff, to all as well. Remember Anna-Maria will be the POC for the directives/IM process so feel free to reach out to her with any questions.

#### UPDATE: WHB IMs

Hello all! As previously stated, the program is in the process of updating/revising/developing guidance. The attached list identifies the IMs, who has been assigned to lead the effort and due dates. We will be discussing the following:

- \* Status Updates re: IMs you are leading
- \* Tentative dates (Due Dates)
- \* Questions on what is needed
- \* Next steps

**The 2015 IM and Standards had simply been extended**



**From:** Alan Shepherd, Acting Division Chief, BLM National Wild Horse and Burro Program (FOIA p. 304)  
**Subject:** Re: UPDATE: WHB IMs  
**Date:** January 29, 2018 at 4:54 pm  
**Importance:** High

CAWP Policy IM for Gather has been extended a couple times and currently expires in Sept 2018.

←January 29, 2018:

Alan Shepherd, Acting Division Chief of the BLM's National Wild Horse and Burro Program, stated that the Instruction Memorandum (IM) establishing policy for the Comprehensive Animal Welfare Program (CAWP) for Wild Horse and Burro gathers—previously extended several times—was set to expire in September 2018.

**From:** [Shepherd, Alan B](#)  
**To:** [Kane, Albert J - APHIS](#)  
**Cc:** [Haddell, Ivette](#); [Warr, Victor \(Dart\)](#); [Neill, John J](#); [Fluer, Scott L](#); [Stratton, Joseph A](#); [Easley, Anna Maria](#)  
**Subject:** Re: UPDATE: WHB IMs  
**Date:** Monday, January 29, 2018 4:54:12 PM  
**Importance:** High

CAWP Policy IM for Gather has been extended a couple times and currently expires in Sept 2018

Thanks,  
Alan

Alan Shepherd  
Acting Division Chief (W0260)  
National WH&B Program  
20 M St SE  
Washington, DC 20003

From: Anna-Maria Easley, Sr. Wild Horse and Burro Specialist, BLM (FOIA p. 5)  
Subject: Re: CAWP-Gathers IM  
Date: March 1, 2018 at 3:03 pm

Good afternoon! I'd like to get some of your suggestions on this IM before it goes out to the group for review. I've made some initial edits and added some questions in the margin, but I don't know the history. I'll be gone the next 2 weeks, but if you could review during that time, I'll set up a conference call when get back for further discussions. We have a month before it's scheduled to go to the group. Thanks for your help!

←March 1, 2018:

Anna-Maria Easley, BLM Senior Wild Horse and Burro Specialist, prioritized the rapid rollout of the proposed Instruction Memorandum (IM) establishing the policy for Comprehensive Animal Welfare (CAWP) for Wild Horse and Burro Gathers, without regard for the policy's historical context.

On Thu, Mar 1, 2018 at 3:03 PM, Easley, Anna-Maria <ameasley@blm.gov> wrote:  
Good afternoon!

I'd like to get some of your suggestions on this IM before it goes out to the group for review. I've made some initial edits and added some questions in the margin, but I don't know the history. I'll be gone the next 2 weeks, but if you could review during that time, I'll set up a conference call when I get back for further discussions. We have a month before it's scheduled to go to the group.

Thanks for your help!  
Anna-Maria

Sr. Wild Horse and Burro Specialist  
DOI - Bureau of Land Management  
Washington, DC  
WFO - 260

**The IM is like the cover letter.  
No review of the Standards  
has taken place.**

**SENIOR staff unaware of the history  
of CAWP.**

From: Ruth Thompson, Wild Horse and Burro Program Lead  
BLM Nevada State Office (FOIA p. 5)  
Subject: Re: CAWP - Gathers IM  
Date: March 19, 2018 at 9:31 am

Anna Maria,  
Attached are my comments.  
2 attachments → PermIM CAWP, PermIM CAWP Atmt1,2

←March 19, 2018:

Ruth Thompson, Nevada BLM Wild Horse and Burro Program Lead, submitted comments on the proposed "Permanent" Instruction Memorandum (PIM) establishing "permanent" policy for CAWP for Wild Horse and Burro Gathers.

Re: CAWP - Gathers IM

Thompson, Ruth A <rthompso@blm.gov>  
Mon 3/19/2018 9:31 AM

To: Easley, Anna-Maria <ameasley@blm.gov>  
Cc: Shepherd, Alan B <ashepher@blm.gov>; Al Kane <albert.j.kane@aphis.usda.gov>; Warr, Victor (Gus) A <gwarr@blm.gov>; Stratton, Joseph A <jstratto@blm.gov>

2 attachments (1 MB)

PermIM CAWP 3 19 18.docx; PermIM CAWP Atmt1 3 19 18 2.pdf;

Anna Maria,

Attached are my comments

**They are reviewing the cover letter (IM)  
to make it Permanent. That is all they are  
doing concerning welfare issues during  
roundups. There is no audit or data-based  
review.**

From: Albert J. Kane, DVM, MPVM, PhD (epidemiology)  
Senior Staff Veterinarian Advisor, APHIS/BLM Wild Horse  
and Burro Partnership (FOIA p. 271-272)  
Subject: RE: CAWP - Gathers IM  
Date: March 19, 2018 at 7:00 pm

And PS – for those who weren't around when this started or if you want a review of what the CAWP is supposed to be see below...

Steps in an animal welfare auditing program, modified a little for BLM, include:

- 1) Establish the SOPS
- 2) write policy and contracts requiring people follow the SAPs (specific to BLM)
- 3) educate staff on SAPs
- 4) develop auditing tools, schedule etc.
- 5) internal audits
- 6) feedback loop to repeat 1-4 as needed
- 7) repeat internal audits
- 8) communicate internal audit results with public (congress)
- 9) external audits
- 10) feedback loop to repeat 1-4
- 11) repeat external audits
- 12) communicate external audit results to public (congress)

These 12 steps need to be repeated for 5 parts: 1) on range, 2) gathers, 3) corrals, transportation, adoptions, 4) ORPs and 5) post adoption compliance.

The 5 parts, from range to post adoption compliance are what is meant by the word "Comprehensive".

"12 steps x 5 parts = 60 steps to full implementation and completion of the CAWP.

As far as I can tell at this time BLM has taken gathers as far as step 3 and half of 4 (we have a tool but not a plan for how and where audits will be conducted), and has taken corrals/transportation/adoptions as far as step 1.

← March 19, 2018:

Albert J. Kane, DVM, MPVM, PhD (epidemiology), Senior Staff Veterinarian Advisor for the APHIS/BLM Wild Horse and Burro Partnership, explained the intended purpose of the Comprehensive Animal Welfare Program (CAWP) and outlined the 12 steps required for a fully implemented animal welfare auditing system – from on-range management through gathers and up to post-adoption oversight.

*"BLM has taken gathers as far as step 3 and half of 4 (we have a tool but not a plan for how and where audits will be conducted)."*

Other portions of his comments, however, were redacted by the BLM.

**In March 2018, Dr. Al Kane tries to tell BLM Senior staff that the internal audit was never done. He tries to tell them no release of data to the public or external audit (public input) has occurred.**

**FOIA requests show no internal audit was ever done prior to making the CAWP Gather Standards Permanent... even after this cautionary email.**

**During litigation at the Antelope Complex roundup in 2023, BLM asserted that the "public comment period" (that never, in fact, occurred) was past the "statute of limitations" to litigate.**

**These kinds of lies populate reports to Congress and documents BLM has filed with various courts.**

b(5) DPP

[REDACTED]  
 [REDACTED]  
 [REDACTED]

[REDACTED]

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\_\_\_\_\_

- 1) Establish the SOPs
- 2) write policy and contracts requiring people follow the SOPs (specific to BIM)
- 3) educate staff on SOPs
- 4) develop auditing tools, schedule etc.
- 5) internal audits
- 6) feedback loop to repeat 1-4 as needed
- 7) repeat internal audits
- 8) communicate internal audit results with public (congress)
- 9) external audits
- 10) feedback loop to repeat 1-4

From: Victor Warr, WH&B Program Manager, BLM-Utah State Office (FOIA p. 7)  
Subject: Re: CAWP – Gathers IM  
Date: March 20, 2018 at 11:21 am

OK ... I'm the last to get my preliminary comments in on this IM - sorry. I've attached a the draft IM with a few edits and comments.

I did not edit the PDF Standards document. There is a bunch of highlighted stuff that I don't understand what has been done there. Maybe we will get on a call to discuss. ???

"I agree with the comments about not being a permanent IM, and taking out the assessment tool sections."

←March 20, 2018:

Victor Warr, BLM's Wild Horse and Burro Program Manager, BLM-Utah State Office, agreed the proposed Instruction Memorandum (IM) on CAWP for Gathers not permanent policy.

*"I agree with the comments about not being a permanent IM, and taking out the assessment tool sections."*

↓  
On Tue, Mar 20, 2018 at 11:21 AM, Warr, Victor (Gus) <[gwarr@blm.gov](mailto:gwarr@blm.gov)> wrote:

OK ... I'm the last to get my preliminary comments in on this IM - sorry. I've attached a the draft IM with a few edits and comments.

I did not edit the PDF Standards document. There is a bunch of highlighted stuff that I don't understand what has been done there. Maybe we will get on a call to discuss. ???

I agree with the comments about not being a permanent IM, and taking out the assessment tool sections.

Anna-Maria - I'm out all of next week for a call, but will participate if we can find a time to discuss. I didn't send this out to the entire WO-260 group. Are you still trying to have this going out to the States on the 28th of March? Per your Excel spreadsheet schedule.

From: Anna-Maria Easley, Sr. Wild Horse and Burro Specialist, BLM (FOIA p. 11)  
Subject: Re: CAWP - Gathers IM  
Date: March 20, 2018 at 12:52 pm

Al and Joe,  
If you could incorporate all your comments as track changes, I'll consolidate and send back to this group and we might not need a phone discussion. Making it temporary vs permanent is little more than adding an expiration date, so consider that done. I'm serving as the blind shepherd on this one, so please make it awesome and then I'll send it out to everyone else next week!  
Thanks for your help!

←March 20, 2018:

Anna-Maria Easley, BLM's Senior Wild Horse and Burro Specialist, commented that making the Comprehensive Animal Welfare

Program (CAWP) and the standards for wild horse and burro gathers "permanent policy" amounts to little more than removing the expiration date.

From: Easley, Anna-Maria [mailto:[amesley@blm.gov](mailto:amesley@blm.gov)]  
Sent: Tuesday, March 20, 2018 12:52 PM  
To: Kane, Albert J - APHIS <[Albert.J.Kane@aphis.usda.gov](mailto:Albert.J.Kane@aphis.usda.gov)>  
Cc: Warr, Victor (Gus) <[gwarr@blm.gov](mailto:gwarr@blm.gov)>; Thompson, Ruth <[rthomoso@blm.gov](mailto:rthomoso@blm.gov)>; Alan Shepherd  
k.office365.com/mail/AMNAD0ANZ230TE4LTizYTEINGUxYS1N2FLTBmZTjYg4YTMjMgAuAAAAAAvmmJdPpV5IqBA%2FDqTgA...

Mail - Thompson, Ruth A. - Outlook

<[ashenher@blm.gov](mailto:ashenher@blm.gov)>; Joseph Stratton <[Joe\\_Stratton@blm.gov](mailto:Joe_Stratton@blm.gov)>  
Subject: Re: CAWP - Gathers IM

Al and Joe,

If you could incorporate all your comments as track changes, I'll consolidate and send back to this group and we might not need a phone discussion. Making it temporary vs permanent is little more than adding an expiration date, so consider that done. I'm serving as the blind shepherd on this one, so please make it awesome and then I'll send it out to everyone else next week!

Thanks for your help!

Anna Maria

From: Albert J. Kane (FOIA p. 11)  
Subject: RE: CAWP – Gathers IM  
Date: March 20, 2018 at 1:47 pm

I think revision of the 'Standards' document is beyond the scope of renewing the IM.  
My impression is reissuing the IM is to say gathers must follow the CAWP standards...not a chance to redo the standards. Rewriting the standards would be a larger part of the CAWP itself and should only be after initial audits and review by the same type of team we had when we wrote the standards. If I'm wrong then we can certainly discuss and/or fix things that have been brought up as a problem, but I'm not really interested in rehashing the details just because the IM is being reissued? At this point I'd like to know if the field has any major problems with the Standards before we even think of making changes.  
So is a call needed? I don't know ...

←March 20, 2018:

Albert J. Kane, DVM, MPVM, PhD (epidemiology), Senior Staff Veterinarian Advisor for the APHIS/BLM Wild Horse and Burro Partnership, explained:

*"I think revision of the 'Standards' document is beyond the scope of renewing the IM.*

*My impression is reissuing the IM is to say gathers must follow the CAWP standards...not a chance to redo the standards. Rewriting the standards would be a larger part of the CAWP itself and should only be after initial audits and review by the same type of team we had when we wrote the standards."*

On Tue, Mar 20, 2018 at 1:47 PM, Kane, Albert J - APHIS <[Albert.J.Kane@aphis.usda.gov](mailto:Albert.J.Kane@aphis.usda.gov)> wrote:

I think revision of the "Standards" document is beyond the scope of renewing the IM. Most of the changes I see highlighted are minor, mostly discretionary, grammatical things so I don't really think it needs any changes. My impression is reissuing the IM is to say gathers must follow the CAWP standards ... not a chance to redo the standards. Rewriting the standards would be a larger part of the CAWP itself and should only be after initial audits and review by the same type of team we had when we wrote the standards. If I'm wrong then we can certainly discuss and/or fix things that have been brought up as a problem, but I'm not really interested in rehashing the details just because the IM is being reissued?

At this point I'd like to know if the field has any major problems with the Standards before we even think of making changes.

So is a call needed? I don't know ...

Albert Kane, DVM, MPVM, PhD (epi)  
Advisor, APHIS/BLM WH&B Partnership

**The first internal audit was supposed to take place in 2016 through the Assessment Tool this committee simply dropped. The second internal audit was to take place end of 2017. Then the documents were supposed to be released to the public and the first external audit should have occurred.**

**Wild Horse Education**

From: Anna-Maria Easley (FOIA p. 10)  
Subject: Re: CAWP - Gathers IM  
Date: March 23, 2018 at 8:59 am

Good morning everyone! I've incorporated your feedback. Please take one more quick look and make sure you love it before I send it out to everyone else next week. Thanks for your help!  
1 attachment → TempIM GatherCAWP

Re: CAWP - Gathers IM

Easley, Anna Maria <ameasley@blm.gov>

Fri 3/23/2018 8:59 AM

To: Stratton, Joseph A <jstratto@blm.gov>

Cc: Kane, Albert J - APHS <Albert.J.Kane@aphis.usda.gov>; Watt, Victor (Gus) A <gvatt@blm.gov>; Thompson, Ruth A <rthomps@blm.gov>; Shepherd, Alan B <ashepher@blm.gov>; Stratton, Joseph A <jstratto@blm.gov>

1 attachment (748 KB)

TempIM GatherCAWP.docx

Good morning everyone!

I've incorporated your feedback. Please take one more quick look and make sure you love it before I send it out to everyone else next week.

Thanks for your help!  
Anna-Maria

←March 23, 2018:

Anna-Maria Easley, BLM's Senior Wild Horse and Burro Specialist, commented,

*"I've incorporated your feedback. Please take one more quick look and make sure you love it before I send it out to everyone else next week."*

From: Anna-Maria Easley (FOIA p. 1)  
Subject: Please Review! IM for CAWP Gathers  
Date: March 27, 2018 at 1:21 pm

Good afternoon!

Attached, please find the updated IM for CAWP for WHB Gathers. (I've included the referenced CAWP Standards, but unless there are major changes, the Standards will not be updated at this time, just the IM). Please share with appropriate BLM staff and provide consolidated, substantive comments in track changes to me by April 11th. I will assume you think it's perfect if I don't receive comments! Please respect this is a draft, internal working document and not appropriate for public distribution at this time. Please let me know if you have any questions.

2 attachments → TempIM GatherCAWP, TempIM GatherCAWPstandards

→ "Permanent Instruction Memorandum, Comprehensive Animal Welfare Program for Wild Horse and Burro Gathers" (BLM REDACTED)

←March 27, 2018:

Anna-Maria Easley, BLM's Senior Wild Horse and Burro Specialist commented that the document "CAWP for Wild Horse and Burro Gathers Standards, June 30, 2015," would not be updated, just publishing the Permanent Instruction Memorandum (IM). BLM simply characterized the CAWP for Gathers permanent policy. This is evidence they completely reneged on their pledge to take steps to ensure the humane care and treatment of wild horses and burros, and never went through the process to formalize permanent policy.

Furthermore, BLM redacted the document.

**BLM did NOT formalize the Standards, they formalized the IM. Basically, they wrote a cover letter to make it look like they did all the work and created a real welfare policy and attached it to the unassessed 2015 draft Standards.**



From: Albert J. Kane, DVM, MPVM, PhD (FOIA p. 1)  
Subject: RE: CAWP IM  
Date: June 28, 2019 at 11:45 am

I think your comments in the IM are good... (BLM REDACTED)

As far as the comments in your email ... the "Comprehensive" part of CAWP means the welfare Program applies to all BLM horses everywhere under BLM management at all times by anyone interacting with them, including volunteers. The process is as follows:

- 1) establish overall goals and specific objective, establish the correct mindset
- 2) establish standards, SOPs, "guidelines"
- 3) train everyone on them
- 4) internal auditing for compliance with your internal standards
- 5) report the results
- 6) revisit and revise as needed
- 7) invite external auditing using your internal standards
- 8) report the results
- 9) revisit and revise as needed
- 10) repeat

Each of these should be done in every area of the WH&B Program:

- 1) on-the-range
- 2) during gathers
- 3) at ORC
- 4) during all aspects of transportation
- 5) at adoptions/TIP/storefronts
- 6) at ORP
- 7) following adoption prior to titling

The only components of the Program that have been developed are the guidelines for 1) gathers and 2) ORC, transportation and adoption events and 3) the training module for gathers. Remaining to be developed would be the guidelines for 3) on-the-range, 4) ORPs and 5) post adoption compliance including all the steps 4-10 above. The "at adoptions" part has become more complicated because we now have more things like TIP trainers, storefronts etc. ... but the CAWP guidelines should apply to all of these, employees, contractors, volunteers, adopters etc.

←June 28, 2019:

Albert J. Kane, DVM, MPVM, PhD (epidemiology), Senior Staff Veterinarian Advisor for the APHIS/BLM Wild Horse and Burro

Partnership, reiterated the earlier explanation that the only steps BLM has taken in the CAWP Program for Gathers is to step 3.

BLM redacted some comments.

**In March of 2018, Dr. Kane wrote a nearly identical email to the committee that included senior BLM Wild Horse and Burro Leadership. The email again notes that the internal audit, revision, reporting (public), inviting external audit (meaning public), revise and repeat.**

**None of this had been done. By March of 2018, BLM had done not one single review of one single roundup.**

**But Senior staff was rushing to create a "Permanent IM" to give the impression that they were following the promises made when they first released the draft Standards in 2015.**

From: [REDACTED]  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: [REDACTED]  
Date: Friday, June 28, 2019 12:46:07 AM  
Importance: High

I think your comments in the WM are good. [REDACTED]

As far as the comments in your email ... the "Comprehensive" part of CAWP means the welfare Program applies to all BLM issues everywhere under BLM management at all times by anyone interacting with them, including volunteers.

The process is as follows:

- 1) establish overall goals and specific objective, establish the correct mindset
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- 10) repeat

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- 1) on-the-range
- 2) during gathers
- 3) at ORC
- 4) during all aspects of transportation
- 5) at adoptions/TIP/roundups
- 6) at ORP
- 7) following adoption prior to tending

The only components of the Program that have been developed are the guidelines for 1) gathers and 2) ORC, transportation and adoption events and 3) the training module for gathers. (Remaining to be developed would be the guidelines for 3) on-the-range, 4) ORPs and 5) post adoption compliance including all the steps 4-10 above. The "at adoptions" part has become more complicated because we now have more things like TIP trainers, roundups etc. ... but the CAWP guidelines should apply to all of these, employees, contractors, volunteers, adopters etc.

And [REDACTED]

From: Wild Horse Education (FOIA p. 197)  
To: Alan Shepherd, Acting Division Chief, National WH&B Program  
Ruth Thompson, Wild Horse and Burro Program Lead BLM Nevada State Office  
Subject: Re: CAWP; Training of NV Personnel  
Date: Aug 13, 2019 at 8:27 am

From: Laura Leigh, Wild Horse Education  
Attachment→FINAL CAWP postTripleB2019  
WHE post-Triple B report. Our database is demonstrating a clear and concise deterioration in comprehension and implementation of CAWP. Training of any personnel that will serve as COR is required. We hope you take this seriously and implement training prior to any additional helicopter roundups. Thank you.

Even though we had been emailing numerous times each year requesting a copy of the reviews and Assessment Tool findings, requesting the date and channel for public input, BLM only included one email from us within the FOIA documents. We repeatedly sent in-depth reports to BLM. The FOIA notes only one sent after it became painfully clear the COR (person in charge) at The Triple B roundup of 2019 had not even read the CAWP Standards.

It is worth noting that BLM later made that person a key member of the CAWP team.

←August 2019, Laura Leigh, Wild Horse Education, to Alan Shepherd, Chief of National WH&B Program –

*"Our database is demonstrating a clear and concise deterioration in comprehension and implementation of CAWP. Training of any personnel that will serve as COR is required. We hope you take this seriously and implement training prior to any additional helicopter roundups."*

Attachment: Post Triple B 2019 Roundup Report, WHE.

Fwd: [EXTERNAL] Re: CAWP; Training of NV Personnel

Thompson, Ruth A <[rthompso@blm.gov](mailto:rthompso@blm.gov)>

Tue 8/13/2019 8:35 AM

To: Noyes, Benjamin F <[bnoyes@blm.gov](mailto:bnoyes@blm.gov)>; Thompson, Bruce W <[b50thomp@blm.gov](mailto:b50thomp@blm.gov)>

1 attachment (37 KB)

FINAL CAWP postTripleB2019.pdf

For your records

----- Forwarded message -----

From: WildHorseEducation . <[wildhorseeducation@gmail.com](mailto:wildhorseeducation@gmail.com)>

Date: Tue, Aug 13, 2019 at 8:27 AM

Subject: [EXTERNAL] Re: CAWP; Training of NV Personnel

To: Shepherd, Alan <[ashepherd@blm.gov](mailto:ashepherd@blm.gov)>, Thompson, Ruth <[rthompso@blm.gov](mailto:rthompso@blm.gov)>

Attached is the final. I attached the draft to the first email.

On Tue, Aug 13, 2019 at 8:10 AM WildHorseEducation . <[wildhorseeducation@gmail.com](mailto:wildhorseeducation@gmail.com)> wrote:

Attached find cover letter and draft WHE post-Triple B report.

Our database is demonstrating a clear and concise deterioration in comprehension and implementation of CAWP.

Training of any personnel that will serve as COR is required. We hope you take this seriously and implement training prior to any additional helicopter roundups.

Thank you.

Laura Leigh

BLM has provided no new FOIA-based information.

**On December 18, 2020, BLM published the Permanent IM for the Comprehensive Animal Welfare Program (CAWP).**

**This was done without a single internal audit of the Standards.  
This was done without releasing any "data" to the public.  
This was done without one single external audit.  
This was done without one single revision.**

**NO formalized welfare policy, rules or Standards exists today.**

**The Permanent IM (basically the cover letter) took  
BLM four years to finalize.**