

Comprehensive Animal Welfare Program Team Assessment Report

August 30, 2022

Gather Name: Twin Peaks Wild Horse and Burro Gather

State: California

District/Field Office: NorCal District/Eagle Lake Field Office

Incident Commander: Emily Ryan

Lead COR: Pat Farris

Contractor: Sampson Livestock

Gather Method: Helicopter Dive Trapping

Gather Reason: AML, outside HMA, and private land issues

CAWP Assessment Team Members: Jerrie Bertola, Jake Benson, and John Hall

Assessment Dates: August 8, 10, and 11, 2022

Total Number of CAWP Gather Standards: 189

Number of Applicable CAWP Gather Standards: 138

Compliance with Applicable CAWP Standards: 113/138 = 82%

General Notes and Comments from the CAWP Team: Observations by the Comprehensive Animal Welfare Program assessment team during the Twin Peaks wild horse and burro gather indicate that humane handling and care were not the primary concerns at this gather operation. Excessive use of the electric prod was documented at the trap, temporary holding and during loading of wild horses and burros. The team also observed poor handling techniques that were causing difficulties while working the wild horses at temporary holding and the burros at the trap. Crew members gave the wild horses and burros mixed signals and direction with the placement of their own bodies and flagging front to back and both front and back at the same time. Working the wild horses and burros from above was also causing increased difficulties in handling. When handling methods were ineffective, suggestions to improve their methods from the CAWP team were generally dismissed during load out.

The CAWP team was provided access to all aspects of the gather operations and had good coordination with the gather team despite the remote location with limited cellular coverage.

Requirements of Permanent Instruction Memorandum (PIM) 2021-002, Wild Horse and Burro Comprehensive Animal Welfare Program (CAWP):

- All state, district, and field offices will continue to comply with the WHB CAWP policy within their jurisdictions at all times. This includes the CAWP Standards for Wild Horse and Burro Gathers.
- All personnel, including contractor and partners involved in the care, handling, and transportation of wild horses and burros at wild horse and burro gathers are required to complete training annually.

Annual training was completed by BLM and the contractor, but it is recommended that this training be repeated as well as a full review of the CAWP standards for wild horse and burro gathers prior to another wild horse and burro gather by this contractor and in this Field Office.

Conditions found to be in non-compliance with the CAWP Standards for Wild Horse and Burro Off-Range Corrals:

Trap Site

Standard

I.A.13 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.

Non-compliance: The visual barrier on the first bow gate into the trap did not cover the gate enough to provide a visual barrier, and it was not secured in place.

Standard

IV.C.2.a Electric prods must only be a commercially available make and model that uses DC battery power and batteries should be fully charged at all times.

Non-compliance: The first electric prod that was picked up to use was not fully charged.

Standard

III.B.2 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 by spraying the ground with water was not completed at the trap site when it was necessary.

Trap Site Animals

Standard

I.A.14 Non-essential personnel and equipment must be located to minimize disturbance of WH&Bs.

Non-compliance: Equipment (saddle horse) was tied to the forward part of the trap causing disturbance when the crew was moving burros forward in the trap and when loading.

Standard

IV.C.2 Electric prods must not be used routinely as a driving aid or handling tool.

Non-compliance: The electric prod was used routinely as a handling tool at the trap.

Standard

IV.C.2ab Electric prods must only be a commercially available make and model that uses DC battery power and batteries should be fully charged at all times. The electric prod device must never be disguised or concealed.

Non-compliance: The electric prods were not all fully charged.

Standard

IV.C.2.d Electric prods must only be picked up when intended to deliver a stimulus; these devices must not be constantly carried by the handlers.

Non-compliance: Once the electric prods were picked up, they were constantly carried by the handlers.

Standard

IV.C.2.c Electric prods must only be used after three attempts using other handling aids (flag, shaker paddle, voice or body position) have been tried unsuccessfully to move the WH&Bs.

Non-compliance: There were times when three attempts using other handling aids did not occur before using the electric prod.

Standard

IV.C.2.e Space in front of an animal must be available to move the WH&B forward prior to application of the electric prod.

Non-compliance: On multiple occasions the electric prod was used on burros directly behind other burros in an attempt to create a “pushing-up” reaction while being moved in the trap.

Temporary Holding Corral

Standard

I.A.4 Fence panels in pens and alleys must be not less than 6 feet high for horses, 5 feet high for burros, and the bottom rail must not be more than 12 inches from ground level.

Non-compliance: The panels were 6 feet when connected to the legs, but due to the soil conditions at the temporary holding corral, the panels and legs were sinking and in multiple places were not 6 feet high.

Standard

I.A.5 The temporary holding facility must have a sufficient number of pens available to sort WH&Bs according to gender, age, number, temperament, or physical condition.

I.A.5.b Alternate pens must be made available for the following:

- 1) WH&Bs that are weak or debilitated

2) Mares/jennies with dependent foals

Non-Compliance: Sufficient pens were not available to sort by gender, temperament, and physical condition, including debilitated animals.

Standard

I.A.13 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.

Non-compliance: The visual barrier was not secured in place, which allowed it to flap in the wind and into the pens.

Standard

I.A.11 Water must be provided at a minimum rate of ten gallons per 1000 pound animal per day, adjusted accordingly for larger or smaller horses, burros and foals, and environmental conditions, with each trough placed in a separate location of the pen (i.e. troughs at opposite ends of the pen). Water must be refilled at least every morning and evening.

III.B.1.b Water must be provided at a minimum rate of ten gallons per 1000 pound animal per day, adjusted accordingly for larger or smaller horses, burros and foals, and environmental conditions, with each trough placed in a separate location of the pen (i.e. troughs at opposite ends of the pen).

Non-Compliance: Troughs were not placed at the opposite ends of the pens. This was especially obvious in two of the largest pens (stallions and mare/foal pairs).

Standard

III.B.1.c.ii Hay placement must allow all WH&Bs to eat simultaneously.

Non-compliance: Placement of hay did not allow for all wild horses to eat simultaneously.

Standard

III.B.4.d Alternate pens must be made available for the following:

- 1) WH&Bs that are weak or debilitated
- 2) Mares/jennies with dependent foals

Non-compliance: The pen for the weak or debilitated wild horses included foals, mares, and stallions.

Standard

III.B.4.f WH&Bs in pens at the temporary holding facility should be maintained at a proper stocking density such that when at rest all WH&Bs occupy no more than half the pen area. (minor)

Non-compliance: The stocking density in all pens did not allow for half the pen area to be open and available for wild horses to occupy when at rest. This was especially the case in both pens closest to the loading chute and the pen with the debilitated animals.

Standard

III.C.4 Horses not involved with gather operations should remain at least 300 yards from WH&Bs, saddle horses, and pilot horses being actively used on a gather.

Non-compliance: Horses not involved in gather operations were less than 300 yards from the temporary holding corral, and saddle horses were kept in pens adjacent to the horses not involved in gather operations including a mare/foal pair.

Temporary Holding Corral Animals

Standard

IV.C.2.d Electric prods must only be picked up when intended to deliver a stimulus; these devices must not be constantly carried by the handlers.

Non-compliance: Once the electric prod was picked up at the temporary holding corral it was carried constantly by the handlers.

Standard

IV.C.2.e Space in front of an animal must be available to move the WH&B forward prior to application of the electric prod.

Non-compliance: Space was not available to move forward prior to the application of the electric prod on every wild horse that received a stimulus.

Standard

IV.C.2.g Electric prods must not be applied to any one WH&B more than three times during a procedure (e.g., sorting, loading) except in extreme cases with approval of the Lead COR/COR/PI. Each exception must be approved at the time by the Lead COR/COR/PI.

Non-compliance: When the electric prod was used more than three times on one wild horse during sorting, the PI was unaware of it being used and did not approve each exception.

Transport

Standard

V.A.2 WH&Bs identified for removal should be shipped from the temporary holding facility to a BLM facility within 48 hours.

Non-Compliance: Not all wild horses identified for removal were shipped from temporary holding to a BLM facility within 48 hours.

Standard

V.B.10 Partition gates in transport vehicles should be used to distribute the load into compartments during travel.

Non-compliance: Partition gates were not used when transporting wild horses and burros in stock trailers.

Standard

IV.C.2.ab Electric prods must only be a commercially available make and model that uses DC battery power and batteries should be fully charged at all times. The electric prod device must never be disguised or concealed.

Non-compliance: Electric prods were not fully charged at all times.

Standard

IV.C.2.d Electric prods must only be picked up when intended to deliver a stimulus; these devices must not be constantly carried by the handlers.

Non-compliance: Once picked up, the electric prods were carried constantly by handlers during loading of burros.

Standard

IV.C.2.e Space in front of an animal must be available to move the WH&B forward prior to application of the electric prod.

Non-compliance: On multiple occasions, the electric prod was used on burros directly behind other burros in an attempt to create a “pushing-up” reaction while being loaded onto stock trailers. This technique was also being used when burros did not go to the front of the trailer.

Table 1: Overall Summary Rating

CAWP Standards and Policy Requirements	Compliant	Partially Compliant	Non-Compliant	N/A
CAWP Trained BLM Staff	✓			
CAWP Contract Trained Staff	✓			
Required Documentation	✓			
Trap Site Facility		✓		
Trap Site Animals		✓		
Temporary Holding Facility		✓		
Temporary Holding Animals		✓		
Transport Design and Facilities	✓			
Transport Animals		✓		
<i>Compliant – all the activities of the section were compliant with the standards or policy requirements.</i> <i>Partially compliant – one or more activities of the section were non-compliant with the standards or policy requirements.</i> <i>Non-Compliant – all activities of the section were non-compliant with the standards or policy requirements.</i> <i>N/A –activities were not observed during the assessment.</i>				

Rating scale for CAWP Assessments: 96-100% - Excellent, 86-95% - Good, 70-85% - Complies, and 0-69% - Failure to Comply.

Final CAWP Assessment Rating: Complies. 82% of applicable CAWP standards were met.