



U.S. Department of the Interior
Bureau of Land Management

NATIONAL WILD
HORSE & BURRO
PROGRAM

National
Motorized Vehicle
Hearing
Virtual Meeting

May 23, 2024

U. S. Department of the Interior
Bureau of Land Management

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Thursday, May 23, 2024, 3pm MT – Meeting Opens

Welcome & Introductions

Bryant Kuechle, Facilitator, The Langdon Group

Mr. Kuechle, serving as the meeting's facilitator, introduced himself and welcomed attendees. He confirmed that the meeting now in session is the public hearing on the use of motorized vehicles in the management of wild horses and burros for the Bureau of Land Management. Mr. Kuechle explained that video and audio were disabled for members of the public, and that the meeting was being recorded. Captioning will be available on the recording and posted online. He noted that the opportunity to register to provide public comment was advertised in April, and all available slots have been filled. Anyone else wishing to provide comment must do so via email by 5 pm MT, May 23rd. These comments should be addressed to the email provided in the chat box (BLM_HQ_MotorizedVehicleHearing@blm.gov). More details regarding the commenting process, would be provided following a brief presentation by the Bureau of Land Management. Mr. Kuechle introduced Mr. Scott Fluer, the Deputy Division Chief for On Range for the Bureau of Land Management's National Wild Horse and Burro Program

Overview

Scott Fluer, Deputy Division Chief for On Range for the Bureau of Land Management's National Wild Horse and Burro Program

As the authorized officer for the hearing, Mr. Fluer introduced himself. He acknowledged that 11 BLM state offices were being represented at the meeting by their associated Program Leads. Mr. Fluer invited each of the attending State Leads to turn on their camera and microphone to introduce themselves. State leads in attendance introduced themselves as follows:

- Phil Cooley, Arizona
- Amy Dumas, California
- Krystal Johnson, Eastern States
- Chris Robbins, Idaho
- Emily Lent, Oregon and Washington
- Gus Ward, Utah
- Kevin Lloyd, Colorado
- Ruth Thompson, Nevada
- Amy Waring, Montana

Mr. Fluer called the meeting to order. He shared the following information about the responsibility of the Bureau of Land Management, and the purpose of the Wild Horse and Burro program and the standards of treatment and welfare for animals:

MR. FLUER: As Bryant mentioned, before we get to the public comment period, I will share some information about the BLM's use of motorized vehicles in the management of wild horses and burros. The BLM has the responsibility to manage and protect wild horses and burros on certain areas of public lands, as stated in the Wild Free-Roaming Horses and Burro Act of 1971. In addition to managing wild populations on public lands, the BLM also manages wild horses and burros off the range in corrals and pastures and other offsite events, such as adoptions as the BLM works to place animals into private care.

As part of its administration of the Wild Free-Roaming Horses and Burro Act, another law, the Federal Land Policy Management Act of 1976 authorized the BLM to use motorized vehicles. The same act also requires a public hearing to be held on such use. That is the purpose of this hearing today.

MR. FLUER: Before I go into the different uses of motorized vehicles, I want to explain that the actions you are going to hear about are guided by BLM's commitment to humane treatment of standards included in our comprehensive animal welfare program for wild horses and burros. The BLM developed the standards included in the comprehensive animal welfare program in collaboration with animal welfare experts from the School of Veterinary Medicine at the University of California Davis and at the US Department of Agriculture's Animal Plant Health Inspection Service Veterinary Services. These humane handling practices are in place for wild horse and burro gather operations, transportation and care at public events, and in all off range corrals. This year we will continue assessments of gathers, events, and facilities to monitor compliance with the standards. The results of these assessments can be found on our website.

MR. FLUER: Now I will give you some context to BLM's use of motorized vehicles. The BLM uses motorized vehicles in a variety of ways to help manage wild horses and burros. Trucks with trailers are used to move animals from trap site to holding facilities, and from holding facilities to other facilities, and offsite events for adoption and sale activities. Pickup trucks and utility vehicles may be used for monitoring or other activities associated with managing wild horses and burros, such as conducting fertility control operations, delivering supplies, bringing hay and water to animals. Vehicles are also used to transport BLM and contractor personnel.

MR. FLUER: Tractors, loaders, or skid steers are used to move supplies like hay and water, or panels for pens. The BLM may use helicopters or fixed-wing aircraft to conduct population surveys or to determine the locations of wild horses and burros on public lands. As herds outgrow resources available to them on public lands, the BLM may use helicopters to help gather large numbers of animals across rugged terrain, normally as a guide to bring animals into established traps.

MR. FLUER: With that information, this hearing will now move to the public comment segment. I will turn it back over to Bryant to go over some guidelines. State leads you may now turn your cameras off.

Rules of the Zoom

Bryant Kuechle, Facilitator, The Langdon Group

Mr. Kuechle reviewed the procedural guidelines which would be observed throughout the meeting, noting that these same rules were published prior to the meeting and could be seen on the current screen:

Rules of the Zoom

1. Those wishing to address the BLM must register in advance of the public comment period.
2. Speakers must address their comments via audio only.
3. To allow for the maximum number of individuals to express their viewpoints, speakers must finish their comments in the designated time.
4. All attendees must show mutual respect for each other and the BLM.

5. Speakers must not exhibit unprofessional conduct or use inappropriate language (profanity, cursing or swearing).

Violating or disregarding any of the rules may result in being muted or removal from the meeting. The BLM appreciates the public's cooperation to maintaining these rules for the benefit of all involved.

Verbal Public Comment

Bryant Kuechle, Facilitator, The Langdon Group

Mr. Kuechle explained that speakers would comment based on their order of registration. Speakers will address their comments via audio only. He noted that violation or disregard of the outlined Rules of the Zoom including the use of profanity or unprofessional conduct, may result in being muted or removed from the meeting. Mr. Kuechle expressed that the Bureau of Land Management appreciated the public's cooperation with the outlined rules for the benefit of all involved. Mr. Kuechle discussed providing comments that were relevant to the topics of motorized vehicles and that the Bureau of Land Management would not be commenting or responding to comments, and that it in no way reflected their agreement or disagreement with any comment.

Mr. Kuechle reminded attendees that the virtual meeting was being recorded, and that any person who did not wish to be recorded may submit written comments via the email address displayed on the meeting screen. He reviewed the process for public comment, explaining that each commentator would be announced in order, including the next speaker on deck and the way in which participants can raise their hand in Zoom to notify that they are participating and ready to comment. He stated that each person would be allowed two minutes to speak, indicated by a timer on the meeting screen, and that time could not be shared or transferred between people. He asked that commentators begin by stating their name, the organization or agency they represented if applicable, and their location. He reiterated that the mute function would be applied as warranted.

Verbal public comment was provided as follows:

JOANNA GROSSMAN: Thank you. My name is Dr. Joanna Grossman, and I'm the equine program director for the Animal Welfare Institute. Thank you for the opportunity to provide comments on the BLM's use of motorized vehicles to manage federally protected wild horses and burros on public lands. This subject is fraught with controversy, in large part because of the injuries and fatalities that have occurred during roundups.

This past year has seen some particularly notorious examples, ones that put a national spotlight on the agency's misguided approach. Last summer, 11 horses died in a span of 10 days during the Antelope Complex Gather in Nevada. 39 total would lose their lives during that operation alone. Horrifically, a Palomino stallion managed to escape the trap, snapping a hind leg in the process. He was pursued for over half an hour before being shot. The Antelope Complex is simply one recent example. But the agency's relentless pursuit of these panicked animals across vast distances and rough terrain and excessive heat is emblematic of the systemic flaws that have become inherent to these euphemistically termed gathers.

The exorbitant costs associated with helicopter roundups also underline the need to pursue alternatives. According to information from federal records, the BLM has spent over 25 million on helicopter roundups since fiscal year 2017. AWI's position is that bait and water trapping is preferable when the BLM is determined to remove horses. That said, we strongly support reversible fertility control so that wild horses can remain on the range.

For all future gathers, we would reiterate our request that cameras be installed on vehicles and that video be live-streamed. Such technology would vastly improve the transparency of roundup operations and ensure that welfare violations can be promptly addressed. With nearly 21,000 wild equine set to be rounded up in fiscal year 2024, a staggering total that will no doubt balloon the already exorbitant costs associated with off-range holding. Reforms to roundup operations cannot come too soon. Thank you.

TESSA ARCHIBALD: Thank you. My name is Tessa Archibald. I am a policy associate with the Animal Welfare Institute, and I'm based in Colorado. The continued reliance on helicopter roundups is a failure of the BLM to prioritize the healthy horses, part of the healthy horses on healthy rangelands that is so commonly quoted by the BLM.

Wild horse ranges, the HMAs are often difficult to access in rugged country, and that is often cited as justification for the use of helicopters and aircraft in roundups. However, the same recognition of treacherous terrain implies an understanding of the dangers that make these roundups so hard on horses, especially elderly horses, young foals, or pregnant mares that are given no exceptions.

Roundups may occur in extreme temperatures and with no regulation on the distance that horses may be run. They place efficiency over consideration for the animals involved. As this group is well aware, and thank you, Joanna, aerial roundups commonly result in injury and trauma to horses and in death. There is an opportunity to move forward and recognize prospects for improvement. The use of bait and trap provides a viable alternative to helicopter roundups while the committed use of PZP immunocontraceptive fertility control can humanely manage wild horse populations and reduce the need for removals.

Thank you for the opportunity to speak on this issue, and I urge BLM to make substantial commitments to ending helicopter roundups and increasing utilization of humane management such as reversible fertility control. Thank you.

LAURA LEE: Okay. My name is Laura Lee. I'm the president and founder of Wild Horse Education. I have been providing comments both oral and written at these hearings for 15 years. I incorporate all comments made in previous testimony that remain unaddressed into my testimony today. A reminder, these hearings are incorporated into every existing gather EA as meeting the requirement of analysis under NEPA of the proposed and finalized action of gather. Any comment on a draft gather EA that directly addresses the act of gather itself and the impact of the gather to the gathered, we are told that comment is outside the scope. So, this hearing is supposed to be that issue. So now I addressed those issues.

This hearing today is a non-discretionary hearing that serves as a foundational analysis requirement to any given gather EA. NEPA describes analysis requirements for public comment on discretionary hearings and steers agency guidelines towards section 6.9.2 in the handbook regarding the guidance for responding to public comment. Essentially, this creates the identical guidance for responding to comments either in EA or in the EIS process. CEQ regulations also recognize several options for responding.

This hearing today is a non-discretionary hearing utilized in every gather EA to meet NEPA requirements for analysis. These hearings must validate their existence. And time is already running out, two minutes. They also suggest a three minute timeline, by the way. We need to have a response to public comments through the guidance that's given to BLM at minimum for this non-discretionary hearing. Please see my written comments and respond accordingly. Thank you so much.

COLETTE KALUZA: Colette Kaluza for Wild Horse education. I have frequently observed and documented these events at gather and removal of wild horses by BLM. These are repetitive and reoccurring events causing unnecessary injuries and deaths. Foals, pregnant mares, weak horses are driven in conditions of mud, heat, cold, smoke, and are not taken into consideration. Foals are being left behind on the range. Helicopter is drive-trapping during foaling season. Helicopter pilot drives bands to trap even though a foal is under three months of age.

BLM has failed to consider current veterinary standards adopted a decade ago for heat index and air quality index. Helicopters come too close to wild horses and risk hitting the horses. Pilot crashed a helicopter while driving horses with horses under the chopper. FAA investigation found pilot at fault for flying too close, I'm sorry, too low to the terrain.

Helicopters drive horses to exhaustion, and repeatedly press and evoke erratic behavior. Trap sites are not placed close to animal locations when possible to minimize the distance animals need to travel to prioritize safety. Helicopters land too close to wild horses. Traps are chosen that use unsafe roads. Horses fall down in stock trailers and injure themselves. Trailers are being driven carelessly and too fast. The drivers do not always stop and unload horses to allow assessment of the downed animal.

Stock trailers are overloaded. Horses are driven by helicopter into a trap and/or loaded onto a stock trailer with a recumbent animal present. Rival band stallions are loaded in the same trailer compartment and fight particularly when adjoining mares. Gates are used as the prime tool to drive and move horses, and paddles are used to hit the horses. Gather operations go too late in the day, and parts of gather operation are not being conducted in daylight. Ramps leading into trailers have gaps.

TAMMI ADAMS: My name is Tammi Adams, and I represent Wild Horse Education. I'm here giving testimony for the fourth year in a row for this administrative hearing mandated under section 404 of FLIPMA, which makes this a legal procedural Hearing, that's hearing with a capital H, not the small-H hearing as in not hearing what the public is saying. I desperately search for regulations demonstrating BLM as a compliance with required laws and processes. Besides NEPA and CEQ, here's what else I found.

FLIPMA section 404 requires meetings be held in the districts where helicopters and motorized vehicles are utilized for wild horse and burro roundups. The government does not flippantly put rules in FLIPMA. It's an important law excluding the Burns Amendment. 5 US code section 702, the public has a right of review and adversely affected or aggrieved by agency action. 5 US code section 704, agency actions are reviewable. Fifth amendment, due process requires legal matters be resolved according to established rules and that individuals be treated fairly.

Government violates due process when they frustrate fairness in proceedings, withhold information or have a bias against the party. COVID is over. One annual national Zoom meeting does not comply with FLIPMA rules of legal procedural hearing nor has it ever produced an outcome. The public has never

been afforded fairness from this legal procedural hearing as the BLM has never produced an outcome nor amended a single line item in the program.

The public asked for outcome. Provision of documentation and summary of public testimony provided during these hearings and specific DOI BLM responses, including an analysis component and a formal document transparently provided to the public. This legal procedural hearing must comply with required rules and regulations and produce an outcome for public review. We can only help for agency compliance this time. Thank you for the opportunity to provide testimony, and I appreciate your time. Thank you.

KAREN SIMAS: Thank you for letting us all speak today. Just as the first speaker, Joanna had mentioned everything I wanted to say, but I reiterate everything she has said. Flying too closely also to the horses. Just using helicopters in general, it's not feasible for horses to keep up, and they're getting run into the ground and lots of injuries. Again, also the trailers are way too full of horses, they're not separated or segregated. They're fighting, they're hurting each other. It just seems the welfare of these animals are not being considered at all. And the management of them is not really management, it's just stripping them from the land. But with that, I'm going to close. And I hope the BLM changes things because we really need to do something different. Thank you.

REBECCA FALK: Okay. So, my name is Rebecca Falk, and I just care about wild horses and burros. I'm not with any organization. In the original Wild Horse and Burro Protection Act 1971, as everyone probably does know, helicopters were never mentioned. They weren't mentioned until 1976. If that is the case, then helicopters can be pulled out of the original Wild Horse and Burro Protection Act. They are not right and a lot of horses get injured.

Use of helicopters to roundup wild horses and burros equals danger and great financial expense, results in trauma, injuries, and death. Family bonds are torn apart, especially when foals are taken away from their mothers. Wild horses are barely family oriented, and so are burros, but especially wild horses, and they care about their herd mates. Every single roundup is traumatic to the wild horses and burros.

Time and time again, helicopters endanger wild horses and burros. They also endanger of wildlife as well. Young foals tripping and falling, wild horses getting scared, roundups during what they called foaling season, March 1st to June 30th. That's great that there is no roundup during that time, but that is not foaling season, for all the herds. That needs to be looked at. There's foaling season in various herds, and BLM needs to address that such as the Pancake Wild Horses. In Nevada, foaling seasons is usually in January or February. There's other ones as well.

That needs to be addressed, and BLM needs to define site-specific foaling seasons to comply with regulations prior to roundups. Until they do, mares could abort their babies or foals could seriously get injured or die. It is not right to use helicopters and they need to be phased out. Site-specific foaling season is very important for any roundup. Too many wild horses and burros have been endangered because they were rounding up in their foaling season. There also was a young colt in the Pancake area in 2021 where he actually broke his leg because he was chased by a helicopter and had to be put down. That was pretty traumatic.

DEBRA CLEMENTE: My name is Debra Clemente, and I'm from New Jersey. I do oppose the helicopter roundups. I've tried to stay involved all year and follow all of the roundups. And I'm just going to generalize, I'm not going to name specific incidents, but the main issue that I bring up with my

representatives is the enforcement of CAWP. A lot of these, they're horrific, they're inhumane, and they're unbearable to watch. A lot of these have violations and we don't see you correcting the violations.

So, I'm going to say that basically a lot of the horses were run in over a hundred degrees for several days in the heat. And a lot of even the news were reporting to care for your pets and your babies and your elderly and to keep everybody in, and you were running these mares with foals in this heat. Some of the foals were run to exhaustion, their feet were worn off. They had severe dehydration, I'm sure, in holding, broken legs, broken necks. They were roped, they were dragged. Even the ones that were roped were kneeled on.

I think this all should be investigated and caught. A lot of these mares were either run in the snow or in the ice and they were falling. Like the other woman said, they're going to abort. And then the trailers are dirty. Sometimes they're held overnight, their scuffles injuries, and also the speeding is a huge thing where their injuries are in there. I don't think they should be held overnight in these trailers. And I think that the deaths should be accounted after roundup. There's a lot of trauma, and I think that that all needs to be looked at. And I'd appreciate the time. Thank you very much.

JANE PURTZER: Good afternoon. Thank you for the opportunity to speak. I feel that the use of helicopters terrorizes the wild horses. I would like to see the roundup stopped. I think that the full season should be defined more clearly so that they're not endangered. The other observation is there have been accidents with the trucks traveling over roads at unsafe speeds. I think this needs to be addressed. The use of all these motor vehicles and their admissions contributes to our current problem of climate change. Please stop the roundup and address some of the concerns for safety and the welfare of the wild horses. Thank you so much.

LORI ARAKI: I'm the executive director of the Middle Way Sanctuary. We are mustang advocates. And so far I'm agreeing with most of the comments here. I am very much opposed to use of helicopters and roundups and also ATVs. As far as I know that hasn't been happening, but I would like to make sure that that does not happen. I would also like more accountability for the safety of the horses. I agree about foaling seasons being different in each HMA, and that needs to be considered. For each roundup, bait and trap is a much safer option that I would prefer to see as well.

And I also have concerns about the sheer volume of horses coming into holding. There's not enough people in the country to adopt all of these horses. But again, safety of the horses is the most important issue in my consideration. So, the minimization of motorized vehicle safety of transport between holding and the HMAs is so important. And the accountability, I would like to have more activists or people on the ground that can be watching and that to be considered. The number of horses that are injured and maimed and euthanized directly as a result of the violence of helicopter chases is unacceptable. So, thank you so much for your time, and we'll talk to you another time. Thanks.

LAURIE FORD: Good afternoon. Laurie Ford, Wild Horse Education. This is about burros. The BLM agrees that burros foal year-round, therefore any helicopter roundup scheduled for burros is being conducted during foaling season. Prior to 2020, burros were captured using bait and trap methods. In 2019, 1,700 burros were gathered this way, including 690 from Bullfrog with only one death.

Burros travel in small groups of jennies with their offspring, jacks travel alone. This requires the helicopter to fly longer distances to locate and gather them and herd them back to trap where they're systematically funneled onto trailers. Many scatter, requiring aggressive roping by wranglers often out of

the observer's sight. BLM claims gather-related deaths are less than 1%, ignoring deaths mainly of pregnant jennies from hyperlipidemia and other stress-related maladies that occur within days, sometimes hours after capture.

For example, 25 jennies, heavily pregnant, and one jack, 3.2%, diagnosed with hyperlipidemia died shortly after the Blue Wing Roundup. Necropsies cited a variety of stresses as a factor. 11 pregnant jennies, 7.2%, died from holding complications shortly after the Sinbad Roundup. Necropsies cited hyperlipidemia and capture myopathy as a factor. One burro was also euthanized after a fatal injury while being pursued aggressively by a wrangler. Lethal chronic capture stress persists long after the point of capture, and large numbers of undiagnosed tests continue to occur after adoption as proven by numerous foyers. Arizona is still successfully captures burros using bait and trap methods. Thank you.

DAVID CARR: Hello, I'm David Carr. I'm in Wisconsin. I got interested in this horse welfare movement from the Ashley Avis documentary, which I thought was well done and displayed a lot of the problems that can create emotional reactions from the public who watches that. So, by that, I want to reiterate some things that the Wild Horse Education has established as a guidelines for welfare of the animals. So, with that, I'll go with a couple of rich suggestions they have.

That the use of hearings by the BLM in place of actual analysis of impacts of the use of motorized vehicles during capture, transport, and facilities, and to gather EA preparation is a meaningless, unless hearing results in an analysis document that is made available to the public and likely represents a violation of the principles of the NEPA. Current climate change policies clearly mandate climate-related changes and impacts the included in analysis of proposed action like a gather.

BLM has failed to include current veterinary standards adopted a decade ago for heat index, air quality index. Any use of motorized vehicles for capture of wild horses and burros must include clear guidelines such as those used by the National Weather Service. BLM is currently prohibited from using helicopter drive-trapping during foaling season. BLM failed to define site-specific baseline foaling seasons, as has now manipulated natural foaling season using multiple fertility control methods. BLM must clearly define current and site-specific foaling seasons to comply with this regulation prior to any roundup. And with that, I'll yield and reiterate all the positions of the Wild Horse Education. Thank you.

ALYSSON THEWSES: Okay, great. Thank you. Hello, my name is Alysson Thewes, licensed clinical social worker and equine-assisted psychotherapy practitioner. Despite the BLM management activities attempting to be carried out in accordance with humane treatment standards outlined in the comprehensive animal welfare program, the amount of deaths and injuries of mustangs and burros during roundups clearly speak for themselves as to why utilizing helicopters and other motorized vehicles is an incredibly inhumane way of gathering prey animals. Lastly, as a whole, I hope that if the intent is to actually ethically manage and help these mustangs, the BLM will soon begin working with the Wild Horse Fire Brigade. Excuse me. Thank you so much for your time.

TINA BRODRICK: Tina Broderick here at Reno, Nevada. Since 2012, it's now some 12 years later, I've been commenting on the same issue. Obviously, comments fall on deaf ears. Really stop taking the horses off the range, or at the very least, work with Laura Leigh from Wild Horse Education and the American Wild Horse Conservation for more humane methods of managing our American icons.

If you must, take bachelors, not whole families. Bait and trap, don't use helicopters. Dart mares on the range such as they use on the Virginia range in Reno, Nevada. On the range, not rounding them up. BLM

may have the legal right to roundup horses, but are the actions really morally right? The definition of insanity is doing the same thing and expecting a different outcome. BLM is driving people to insanity with the same old methods of abuse. Thank you for your time.

SASHA TYBURSKI: Thank you for the opportunity to speak. I'm a proud owner of a mustang that I adopted from BLM, and because of her I've become very aware of everything going on. I've been following this for over 12 years. And I'm sad to say that it seems like it gets promising that there'll be changed. The Comprehensive Animal Welfare program seemed promising, yet it doesn't seem like there's any way to effectively make sure that it actually happens. The thought of being internally policed by yourselves is at best is not possible to do so.

So, I would hope that BLM feels very good to be able to speak as the public and hopefully more will be listened to from the public. Because more and more people are becoming aware of this plate, and it's just not acceptable to keep going with things that happened in mares roundup 10 years ago. There should not be mares being run to aborting foals yet again in heat, running babies till their feet come off.

I mean, it's absolutely insane that nothing has really been changed. And I agree with cameras in trailers. I doubt that would happen, but I can't see how anything wrong would come from that. And I think including the public is the only way to have anything go forward. Public needs more access. There's plenty of ways that the public can have access to bear witness to what happens at these roundups without it interfering with the roundup.

SAUNDRA HOLLOWAY: My name is Sondra Holloway, and I'm an American taxpayer and therefore a stakeholder of public land resources. I have a deep and abiding interest in the way our wild horses and burros are managed and treated by the federal government. The use of these hearings by BLM in place of actual analysis of impacts of the use of motorized vehicles during capture, transport and facilities, and gather environmental assessment preparation is meaningless, unless this hearing results in an analysis document that is made available to the public and likely represents a violation of the principles of NEPA. I strongly oppose the use of motorized vehicles for the management and/or removal of wild horses from our public lands.

Subsection 2B of the Wild and Free-Roaming Horses and Burros Act states specifically that excess wild free-roaming horses and burros to be humanely captured. A directive for humane management is mentioned no less than seven times in that document. Running horses to injury and/or death is far from humane. There have been horrific deficits in the handling of wild horses and burros across the American West that is deeply disturbing to me and obviously others.

These deficits often involve the use of motorized vehicles during and after capture. Babies run to collapse in summer heat, wild horses run barbed wire, and wild horses run into an extreme lather in winter. Heavily pregnant mares have been reported to have had late-term miscarriages, and at least one mare was run as she aborted her foal. None of this is humane treatment. Helicopter use should be restricted in all but extreme emergency as in the presence of, say, a wildfire.

Until BLM adequately protects wild horses and burros from the type of conduct demonstrated in the past, the use of helicopters during capture is irresponsible. As a taxpayer, I demand BLM create and publish a review of all practices involving motorized vehicles prior to any use of such. The review must include any and all roundups that have occurred since the introduction of the CAWP policy, and BLM must publish the report on the website for public scrutiny. I also agree with the Wild Horse Fire Brigade. Those horses

could be used to clear brush. Thank you for the opportunity to comment on this very important issue year after year after year.

ALISON KLEE: Hi. I am a passionate equine enthusiast and I am a veterinarian, and I agree with everything that everyone before me has said. I don't know that I can mention anything new other than what you're not hearing, and what we're saying is the anger in our voices. It's been apparent abuse by the BLM, the way they're rounding up these horses with helicopters and the way they're driving them in the vehicles and putting them in the vehicles and just taking care of them. The BLM needs to be more transparent with the roundups and the care of the animals afterwards.

The BLM needs to be held accountable for the safety of these animals with their roundup methods and their care while they're in the holding facilities and during transportation. Cameras should be on all vehicles. An advocate needs to be at the trap site at all times. The injuries that we've seen have been atrocious, and this needs to stop. The wild horse and [inaudible 00:55:46], and it was in the first slide that you posted. The first thing it said was these horses are to be protected. We're trying to protect the horses. The way they're being rounded up and treated is not protection, it's abuse. It's downright abuse and it needs to stop. That's all I have to say.

STEPHANIE MILTON: Hi, my name is Stephanie Milton. I'm in Maryland. I just adopted my third mustang. And in the short time that I've been involved, very short time, just two years, with understanding what is happening with wild horses. I have thought over and over again about my experience with domestic horses. I've been with horses since I was a kid. And I'm about five years away from retiring as a public school teacher, that's how old I am.

I will spend the rest of my life trying to keep them on the land. But I'm keenly aware based on mass that they will be decimated within short order. It's only a matter of years before they will be gone, which is devastating. To that end, I would like to see Tracy Stone-Manning step down. She's not a horsewoman. I would like to see Deb Haaland step down. She's not a horsewoman. And I also want congressional hearings immediately. Thank you.

ANDREA LONSETH: Thank you for having me. Andrea Lonseth, representing myself, no organization. This is morally sick. It is only in the interest of ranchers that you're taking this land from the land that's allotted for the wild horses. You need to work with Craig Downer who has a reserve design plan.

And to begin with, your numbers are totally skewed and you don't even claim to have numbers on how many wild horses are so-called multiplying uncontrollably. I feel like we're in the movie, the Burros, that's just a fantasy because they do not multiply that way. I've owned wild horse land, and I am among them and I see them, their growth. Karen Morris should be on these [inaudible 00:59:18] people. A lot of them are just retirees from the military, and they just can't get violence out of their head. And you police yourself without transparency.

Even when we use the Freedom of Information Act, we can't get information. You do not allow the public to watch these roundups. You do not allow the public to visit the horses after they're in the catch pen or after they're rounded up. The horses fall down in the trucks when you jerk to a start. You put too many, over 30, in a semi, and they're falling all over each other. They're falling all over each other in the catch pen.

The stallions are trying to jump out. And the so-called wranglers flag them and make them trip over the rungs, and then they fall down on themselves and break something. And whenever they've broken something and are injured, of course you shoot them. These are prey animals. Ask a veterinarian what a prey animal is like. Their neurology is way more sensitive than humans.

CRAIG DOWNER: So I appreciate this opportunity to comment on the use of the motorized vehicles in roundup of the wild horse and burros or other. Yeah. I know that's authorized under the FLIPMA in 1976. I generally have, over the years, posted current way of conserving and managing the wild horses that involves a more natural approach to a wild horse and burro conservation, which I term reserve design, and which is actually a branch of conservation biology where I know it would require more effort. But I believe it would be purer to the true spirit intent of the Wild Free-Roaming Horses and Burros Act, whereby through a proper reserve with predators and sufficient space and allowing the animals to fill their niche yet be bounded. There would be a lot of intrinsic population controls that would occur in the horses and burros as climax species if they were so allowed.

So basically, I'm urging for a purer approach to the Wild Free-Roaming Horse and Burros Act which I greatly believe in. It's meant a great deal to me ever since I was quite young. Just something that really sparked a great vision in me and sense of what's right for America and for the horses and burros. I grew up on a horse. And I just wish you would consider reserve design in place of so much brutal helicopter roundups. And you can contact me for that input.

TERESA EDEN: Thank you very much. My name is Teresa Eden. I'm a resident of Illinois and an American taxpayer. Chasing down large numbers of frightened prey animals with something as terrifying and dangerous as a helicopter. Not even taking heat indexes and high winds into consideration, where the actual effects this all has on the animals themselves when doing so can be described as nothing short of animal neglect, cruelty, and abuse.

The Wild Horse and Burro Protection Act rightfully banned the use of helicopters in '71 when the DOI gives the BLM full authority on decision-making for our wild horses and burros with no outside governing or consequences for their actions. It should come as no surprise that the BLM had helicopters approved and back in news just a few years later. Whenever the use of helicopters has been brought to the attention of the American public, the people who actually fund these horrific roundup procedures has been viewed as abhorrent and unacceptable, and they're outraged.

All the scientific research out there proves that helicopters are a cruel and abusive way to roundup frightened wild horses and burros from the deafening sound decibels that are extremely painful to their overly sensitive hearing, to the dust storm brownouts creating vision, impairment and confusion when choppers hover above, to the unbelievable fear they all face that is so great it causes them to trample their own, on top of a slew of other stress-related issues that result in their untimely death within the first 30 days following the roundup.

The BLM is quite aware of these findings, but still pushes and insists on using choppers to remove as many of our wild horses in as short of a timeframe as possible. But why? What is the BLM's rush to get our wild horses and burros locked up in private holding facilities where it costs the American taxpayers 50 times the amount it would've cost to care for them if they had just been left out on the public lands?

The simple truth is the BLM refuses to acknowledge and accept all the scientific research out there, but our wild horses being a native indigenous species to our country. It's been long accepted that all horses on

this planet originated from North America, and without North America there would be no horses in the world. They evolved for millions and millions of years with our North American lands, and benefits from lands just as much as the wild horses and burros themselves benefit and thrive from living wild and free. The exact reason is and why horses became extinct in North America is also a mystery. When horses were brought back to North America by the Europeans by between 1500s and 1600s.

BETH HUBBARD: Not one roundup EA analyzes the impact to the horses and burros upon whom the action is taken. BLM must do a gather EA to analyze the impact on the animals and make the documents available to the public. Failure to do so is likely a violation of NEPA. Humane management is the law. BLM has created a CAWP, a Comprehensive Animal Welfare Program, but totally disregards it. BLM never evaluated it, nor put it out for comment. It was simply typed permanent over temporary on the draft. This is totally unacceptable.

BLM must clearly define current and site-specific foaling seasons to comply with the regulation prior to any roundup. Too many roundups have been done during foaling season. If a foal under three months is seen with a band, the pilot must not drive that band to the trap. Transport during capture must be clearly regulated. Under 25 miles per hour no rough roads due to downed horses. Sorry.

We, the taxpayers, who are paying for all of this must be allowed to easily view the roundups and the holding facilities. The roundups are inhumane and very cruel. After the East Pershing Nevada Roundup, BLM sent 103 dead horses to the rendering plant. Too many horses are being injured, killed, and kept in deplorable holding pens. This has to change.

Wild horses and burros are not overpopulated. The livestock, cattle and sheep who far outnumber the horses and burros on our public lands are destroying said land as BLM's own studies state. BLM stop using the horses as scapegoats. Wild horses, as science has proven, are a tremendous benefit to their ecosystem, but they have been confined to very little of our public lands in order to make room for cattle and sheep that do not belong on our public lands.

Mr. Kuechle noted who had registered but did not provide comment. Mr. Kuechle and the BLM continued on the Zoom meeting with Mr. Kuechle announcing the meeting and the time left to provide comments every fifteen minutes. At 5:00 p.m. Mr. Kuechle noted that the time for public comment had come to an end. He thanked the public for their attendance and for providing comments and turned the session over to Mr. Fluer to conclude the meeting.

Closing Remarks

Scott Fluer, Deputy Division Chief for the On Range Division for the Bureau of Land Management's National Wild Horse and Burro Program.

Mr. Fluer thanked members of the public and the Bureau of Land Management State Leads for attending. He confirmed that all public comments were recorded and would be provided to BLM's decision-makers for consideration. Mr. Fluer wished all a good evening and concluded the meeting.

5pm MT- Meeting Adjourns