



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

NATIONAL WILD
HORSE & BURRO
PROGRAM

National
Motorized Vehicle
Hearing
Virtual Meeting

May 24, 2023

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

Contents

WELCOME & INTRODUCTIONS	2
OVERVIEW	2
RULES OF THE ZOOM.....	3
VERBAL PUBLIC COMMENT	4
CLOSING REMARKS.....	14
WRITTEN PUBLIC COMMENT	16

Wednesday May 24, 2023, 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 24th. 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:

- John Hall, Arizona
- Amy Dumas, California
- Lynae Rogers, Colorado
- Travis Tolbert, Eastern States
- Chris Robbins, Idaho
- Amy Waring, Montana
- Pat Williams, New Mexico
- Garrett Swisher, Nevada
- Emily Lent, Oregon and Washington
- Lisa Reid (filling in for Gus Ward), Utah
- Patricia Hatle, Wyoming and Nebraska

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:

JOYCE KURTZER: Hello, my name is Joyce Kurtzer and I thank you for the opportunity to speak. I am very concerned with the use of the motorized vehicles, particularly the helicopters in the round up. I feel that it is very intimidating and even abusive. I have seen videos of helicopters being used to knock the animals down. I feel that it's unnecessary and would recommend that the BLM explore different means than the use of the motorized vehicle. I also have seen videos where they're using ATVs, where they're ran practically directly into the herd. Thank you very much and I appreciate the opportunity to speak. Have a good day.

LAURA LEIGH: All right, so my name is Laura Leigh. I'm the President and Founder of Wild Horse Education. I've been watching roundups in person for nearly 15 years now. Opened up the ability to watch through litigation. I've participated in these hearings for over a decade. No resolution ever came from

these hearings. We litigated successfully and BLM created the COP policy 45 years after the act passed. And engaging in the COP policy, there's no deliberative materials that show that gather motorized vehicles use and gather are appropriate. These hearings don't have any deliberative materials available to the public to determine whether you have analyzed the action of gather. Every gather EA uses these hearings to claim compliance with NEPA for that analysis requirement. Can't find any deliberative materials anywhere. So I would make a request to BLM to provide the deliberative materials, the analysis, for all of these hearings. Make that available through the archive on the website for the public to take a look at and engage. The legal definition of a hearing would require that there be... It's disputes under the authority of government agencies, an administrative hearing establishes a record of facts and a particular case towards some type of resolution. Furthermore, these hearings are critical as they are also used by the agency to show compliance with analysis requirements under NEPA. So I would make a request that BLM make the deliberative materials from these hearings available to the public. I thank you for the opportunity to comment.

MARIE MILLIMAN: Marie Milliman representing Wild Horse Education. I have participated in multiple helicopter hearings, witness multiple roundups involving motorized vehicles in multiple states while documenting in detail how the use of motorized vehicles consistently violates the safety and wellbeing of our valued public resource. These hearings were mandated when the use of motorized vehicles for the capture and transport wild horses were required by FLPMA. Clearly, safety issues with the use of motorized vehicles were anticipated, both the controversy they represented and the injuries, death and abuse that had and were certain to occur. Yet since these hearings began, the agency simply checks a box of compliance. To my knowledge, there has been no agency actions created after these hearings, considering the substantial public input. While most hearings have similar processes, one, hear witnesses representing various viewpoints. Two, present a transcript to be seriously evaluated and considered by your agency committee. Three, after you're reviewing considerations are made public, reengage the public for further considerations and solutions. Four, at the conclusion of your deliberation, a decision of the agency committee is created to determine what action to take on the measure, and made public. My question to you is what exactly is your process? I'm specifically requesting that this policy be implemented and made public for this and future helicopter hearings. I cite for your convenience, 40 CFR 25.5 E, conduct of hearing: "The agency holding the hearing shall inform the audience of the issues involved in the decision to be made, the considerations the agency will take into account, the agency's tentative determinations, if any, and the information which is particularly solicited from the public." If the agency held these hearings as intended by law, these hearings would include testimony and create needed changes. I request the above outline be implemented in light of the substandard helicopter and vehicle handling of wild horses and burros that I've personally witnessed. It has endangered the safety of a valued public resource and resulted in unnecessary mortally inflicted injuries and mortal-

TAMMI ADAMS: Great, thank you. Hi, my name's Tammi Adams. I represent Wild Horse Education. I'm a tax paying citizen and I'm against the use of helicopters in wild horse and burro roundups. I cite 43 CFR section 4740.1B: "The authorized officer shall conduct a public meeting in the area where such use is to be made." I would like to also draw the attention of the director of the BLM. I'm an environmental engineer and I worked on the largest [inaudible 00:22:01] site in the country in Butte, Montana, where I provided consulting engineering services to the responsible

party. I did research, conducted sampling and data compilation reporting for multiple operable units in that [inaudible 00:22:14] site in accordance with the laws. All of these operable units had unique issues. As a consulting engineer, I was also responsible to attend and provide information to the stake holding Montana public between Butte, Missoula and beyond. There was no CFR law demanding these public meetings, but the governing agencies, EPADEQ and Arco provided them to include public input from citizens who lived in those communities and were most greatly affected by those actions. Citizens who attended these public meetings included ranchers, employees of active minds and advocates from nonprofit organizations like the Clark Fork Coalition. I asked the director, how would it have worked for your interest if EPADEQ and Arco provided only one public hearing per year in DC to address the issues of Milltown Dam or the Clark Fork River? At these town hall meetings, I was occasionally ridiculed about my research and sometimes called names, but I put on my big girl pants and continued to do my job. I presented testimony in 2022 for the first time. For a month prior to the hearing, I researched BLM led helicopter roundups and reports of inhumane handling of wild horses and burros. Funny thing, finding any information on BLM sites was impossible. Please provide, there was information from these hearings because nothing came of the last one. Secretary Haaland promised transparency, please provide such. Thank you for the opportunity to testify.

REBECCA FAULK: So BLM really needs to supply the public with a real hearing instead of just the Zoom, as intended by law. BLM needs to list a number of issues that are raised by the public. Helicopters are cruel and unjust and need to be taken out of round ups. They were not even used in the original wild horse and burro protection act, as everyone knows in 1971. They were introduced in 1976. Helicopters endanger the wild horses and the wildlife, and wild burros of course too. This has been going on for a very long time and the helicopters need to be stopped. Helicopters cause life-threatening injuries and death to wild horses and burros. Helicopters have been seen many times flying too low after wild horses and burros, even though they shouldn't have. One helicopter was even seen chasing a mare giving birth and it kept going, and unfortunately the mare lost its baby. That is terrible and helicopters are something I think that should be phased out in roundups. Helicopter roundups are supposed to be stopped in high temperatures over 90 degrees, I believe by BLM standards. I know for a fact in the Piceance-East Douglas HMA last year in 2022, they were not stopped. I know this for a fact and from various things. I followed this roundup very closely because I do care about all the wild horses and burros, but I do live in Kansas. And I follow the ones in Colorado very closely because they're the close ones to me. Roundups endanger the foals. In the roundups, the CMP did when the helicopters come in, unfortunately, and a lot of the foals do lose their lives with the roundups since the wild horses are in panic. Elam does stop the helicopters and foaling season in March to July, which is good for some horses in foaling season. But some horses do not have foaling season in March and July. In fact, the pancake wild horses actually have them later.

GAIL SUZANNE BARON: I wanted to ask y'all to please help us to protect the last remaining wild horses and burros and mules. These are our kind, account... Sorry, you have to forgive me. I'm going through cancer and my brain's not working. These are iconic symbols of power and freedom. The path of civilization is laid upon the backs and bones of these precious creations of our Heavenly Father. Did you know that the donkeys are mentioned over 400 times in the Bible, our Lord's

instruction book for life. Horse is mentioned over a hundred times. God has called us to be his prayer warriors, good stewards, angels of mercy, freedom warriors for him and guardians over all of his precious creations: humans, animals, and earth. He knows our hearts. He knows our motivations. He knows the absolute truth. He will judge us accordingly. Rewards or consequences of our God-given free will choices. Jesus will return on a white horse and he will eliminate sin and evil from this world by humans who create it without common sense, conscience, compassion, or a godly moral compass. Make a sincere effort to see humans, animals, and earth through our Lord's eyes and his plans, especially for the protection and preservation of what is dear to him, which should be dear to you as his voice, hands and feet on earth. You are his representatives and those of hardworking Americans. Please choose with godly vision, wisdom, courage, strength, and discernment for your own wellbeing as well as these immeasurably beautiful creations of God, by re-implementing the heart and the standards of the original 1971 Wild Horse and Burro Act. Thank you for this time and for hearing our thoughts.

JOANNE GROSSMAN: My name is Dr Joanna Grossman and I'm the Equine Program Director for the Animal Welfare Institute. 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 options so that wild horses can remain on the range. From a practical perspective, large scale roundups are at odds with the BLM's goal to manage populations effectively, given that removals can prompt compensatory reproduction. The exorbitant cost 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. Its agency officials have acknowledged during past wild horse and burro advisory board meetings, bait and water trapping does not cost more, so expense would not be a relevant justification for choosing helicopter roundups. 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. In the last few years, we have seen horrific injuries and fatalities during helicopter roundups, including horses dying of broken necks and limbs, ruptured organs, both succumbing to extreme stress and exhaustion, and a particularly notorious incident in Nevada where a young colt was relentlessly pursued as his leg snapped in half during a helicopter chase. 2021 and 2022 saw the largest roundup of horses in US history, with over 3,500 removed as part of the operation. Given the record number of horses in holding and skyrocketing costs, this trajectory and management approach cannot continue. We support federal legislation introduced today in Congress led by Congresswoman Titus, Congressman Schweikert and Congressman Cohen that would prohibit costly and inhumane helicopter roundups of wild horses. Thank you so much for the opportunity to provide comments during today's hearing.

ANDREA LONSETH: Andrea Lonseth representing [inaudible 00:32:45], Colorado. Why is watching of roundups not allowed? Looking at horses at the end of roundup, not allowed, no filming. You're not hiding horrendous conditions. Put a Go Pro camera on every helicopter, as we the people have asked. 80% of people love wild horses. 500,000 went to slaughter since 2019. The landing skids of the helicopters break legs, break bags, jam horses into plentiful barbed wires. Slam them, knock them, hit them, snap necks. Then you shock them with prods as the only way you could get protective stallions prodded away from the herd onto to the van. The evolution of the horse family started only in North America. Her fossils, during the ice age, horses moved to the southern tips of South America and Africa. They moved freely back and forth on the bearing land bridge between Alaska and Euro-Asia. Their

claimed to native is solid in America, the exact same species of North America and 58 million year old fossils is the exact same species of the present day wild horse. They're a highly evolved ancient order. The Bureau of Land Management decreased the wild horse number so they can't reproduce properly. Now their herd management areas, it's less than one horse every 1000 acres. Money extraction beef creates a fantasy that there are too many. The land reduced to 1% and though horses were allotted the resources of public land in the '60s, ranching extractions taken all but 1%. As a prey flight animal, their magnified, sympathetic and parasympathetic nervous systems are way more delicate than humans and dogs. Are unable to take the mayhem, terror, noise. All that matters to horses is family bonds in the horse terrain. They evolve their intimate roles and relationships in their herd made them survive 50 million years. Foals not run to death called their mothers. Females, males, foals separated. The mother kicking herself to death on the trap fence. 37 dead in one roundup. The heinous helicopters are a sadistic holocaust that you are hiding from the public.

COLETTE KALUZA: Colette Kaluza, volunteer for Wild Horse Education, Minden, Nevada. BLM is often non-compliant with its own stated policies and COP standards on use of motorized vehicles. While BLM is in charge and COR is present and often participate. I commented last year to things I witnessed which caused injuries and deaths. They were not addressed and so they continue. Since the last hearing I witnessed helicopters herd horses through barbed wire fences, so they run into and flip over fences. Drive horses into traps that are so small horses crash into trap panels. Even when a horse crashed, broke its neck and was down, helicopter continued to drive horses into trap. Drive horses, young and old, weak, debilitated, without adjusting, gather and handling methods. Foals often lag behind, are injured and suffer. Inadequate abatement of dust engulfs horses in trap. National Transportation Safety Board determined pilot failed to maintain clearance from the terrain while maneuvering at a low altitude as a probable cause of the helicopter accident. Helicopter was flying so low to the horses that collided with the terrain. Through many FOIAs, every indication is BLM failed to turn over the only video of the accident mine to FAA and obstructed the investigation. Even though BLM informed, I was required to hand video to BLM to hand to FAA. BLM's after action review does not even mention it. It is hard to read the few scribbled notes, taxpayers are being expected to accept BLM's review of this long expensive roundup. I think the helicopter probably hit a horse, then the ground. Let's see, I'll skip down to... Well trailers' gates are slammed in the horses to move them. Positioned too high. Callously loaded so they fight in the trailers. Fast driving. Bail on cop team at triple B roundup for a few days at the start and prematurely published its assessment rating of excellent.

LINDA GREEVES: Hi, I'm Linda Greeves. I'm from the DC area and I'm a tax paying citizen with concern for our wild horses and burros. After following other reports about the roundups for years, which many were shocking, I decided to go out and see for myself. I've gone out the last two years and this has increased my concerns. In regards to this hearing, I expect the public to be given a real hearing with issues and concerns submitted by us listed and looked into and addressed. What areas have been addressed from the last year's hearings? There needs to be an end of the helicopter roundups, and if not at least address the public concerns as we are the ones paying the bills. I have seen horses driven for 45 minutes in the heat, and I know this is as the helicopter was using a siren used to push them harder, which we could hear for over 40 minutes before we saw the horses running into sight. I have seen a trap moved so we could not see anything and the barbwire fencing not be flagged. I have also seen very abusive actions from contractors at trap sites, from using multiple hot shots to roping a blind horse after fighting

with it for 20 plus minutes, trying to get it into the trailer and then using the contractor horses to drag it into the trailer. This horse was down, soaked in sweat and this horse was killed in temporary holding. This conduct continues year after year. These issues include issues during loading, pilots flying too low, pushing too hard, and having sirens on the helicopters and barbed wire not being removed or even flagged that drives past and trap areas. All temporary holding, the helicopter lands there for the night and you could see the horses distressed the next morning when the monster awoke and took off. They should be required to park away from the horses. Also, if there's an ATV is going to go out to kill the horses who break their legs or have other injuries, the driver should be required to stop a quarter mile away at least, to not further traumatize the wounded animal. The chasing it down with one is abuse. I would like to see real acknowledgement of these issues and actions taken. Thank you.

BRENNA WRIGHT: Today I'm commenting as a advisor to Advocates for Wild Equines Lobby Coalition for equine welfare investigations, as well as a American taxpayer. With the interest in the welfare of wild horses and burros, I demand that the BLM supply the public with a real hearing as [inaudible 00:40:45] by law. As Wild Horse Education has said many times, the BLM must provide the public with a list of grievances and issues raised by the public and an analysis document that resolves these issues. I'm tired of watching the same conduct year after year, ignoring trailer height requirements during loading, pilots flying too low and fast, barbed wire are not being removed from drive paths and trap areas. These hearings are intended to address these valid concerns, not green light repetitive wrongdoing. Helicopter roundups are inhumane. Horses are run for miles, sometimes in extreme heat, some collapse. Others will have broken legs. This includes foals. They are run into small traps with very little room. Horses will try and escape and break their legs or necks. And then forced into trailers to go sometimes for hours with no food or water. They are then brought to holding facilities where animal welfare agencies cannot even see them. I do not support the use of motorized vehicles. BLM is failing in oversight and following their own COP laws. Also, I'd like to note, remove the cattle grazing as per 43 CFR 4710.5 A: "If necessary to provide habitat for wild horses or burros, to implement herd management actions, or to protect wild horses or burros, to implement herd management actions, or to protect wild horses from disease, harassment or injury,

SHARI FREIDENRICH: My name is Shari Freidenrich from California. Thanks for the opportunity to speak today. I'm testifying as a private tax paying individual with a strong interest in the welfare and treatment of wild horses and burros. I am adamantly opposed to animal cruelty, especially inhumane treatment in motorized vehicle roundups and other uses done by the BLM, funded with taxpayer funds. Your job is to protect the wild horses and burros, not kill them, get them sent to slaughter, and also not replace their range with low-paying cows and sheep, which often seems to happen. As a CPA and a public servant myself, the federal government receives funding with BLM for motorized vehicle roundups from hard-earned taxpayer funds and should not allow any inhumane treatment of wild horses per the Federal Land Management and Policy Act. That is in violation to have inhumane treatment. And every wild horse burro is branded, we should be able to have a listing of all the animals, similar to other cows or other animals that we would be able to get where is the horse, the burro, where has it been? Where was it rounded up? So information would be very helpful. So first. I do request the BLM supply the public with a real hearing as intended where they would come back with responses, analysis and steps taken to resolve these grievances of inhumane treatment, which we have all described today in much detail. Secondly, the very nature of motorized

vehicles and roundups are inherently inhuman, as mentioned horses are very sensitive animals and there are physical and mental issues with pregnant mares, young foals, newborns, colts and fillies, stallions, older horses. Would you take your mom who's in her seventies or eighties or a young child, and run them to get them to one other place? To get them to move? No, it's inhumane. The ignoring the trailer height requirements, pilots flying too low and too fast. You've heard about all of the deaths from these. The barbed wires not being reviewed, getting the vets to sign off that these deaths were not caused by the helicopters. So in conclusion, again, we need to make sure that helicopter motorized roundups are stopped.

ANNETTE SHAW: I'm speaking in Friends of the Wild Horses and Burros, located in Pahrump, Nevada, requesting updated data which shows justification for the upcoming roundup schedule for 2023. It seems that there has been no any research done or reported created by the disinterested third party that you claim to partner with, which would give us justification to gathers. We respectfully requesting a pause to the '23 roundup, scheduled until and such time that the data is provided and the public has had the time to comment on its content. Using the '22 data, for the most part, is most financially responsible and puts our wild horses population in unnecessary harms way. You still use an unsafe procedure to round up the horses and burros. It has been proven dangerous for the horses and burros. And to be, you still are not showing any transparency on what you do and how you do it. Thank you.

LORI FORD: Lori Ford, New Mexico. Due to my extensive experience with burros and input from specialists, I firmly believe stress in wild burros and the bodily reactions that lead to often fatal systemic responses is directly related to motorized capture and transport methods. Such stress can trigger hyperlipidemia, a high risk for burros when excessive amounts of fats accumulate in the blood and can lead to multi-organ failures. This condition worsens as the burros are processed and often fail to consume enough food to meet their energy needs, especially pregnant Jennys, which can result in foals being aborted or unable to survive after birth. The threat persists even after adoption when burros are exposed to another stressful new environment and diseases. Adopters typically report to seized burros as found dead in field. The burros are also susceptible to the reactivation of dormant infectious pathogens, such as the herpes virus, causing serious respiratory diseases and possible death. As a wild horse education volunteer, I documented the Blue Wing roundup when burros were amassed and held in a holding pattern while groups were separated, pushed into the trap, onto trailers, and hauled to temporary holding in a matter of minutes. Due to the stoic nature of burros and tendency to scatter, pilots and wranglers became more aggressive, and foals separated from their mothers in the chaos required roping. After being shipped, 31 burros died. The majority being Jennys and from hyperlipidemia. Necropsies on six revealed all were pregnant. On day one, two of 24 foals captured were one week old orphans. A fact the IC did not acknowledge when questioned, that were not shipped to [inaudible 00:49:42] until the following day, at which time they were finally put in foster care. One died. If observers had been allowed to visit temporary holding, this story would read quite differently. This is only one example of a longtime pattern of both burros and horses dying after capture, which demands further consideration from the BLM.

JANETTE HECKERT: Hi, my name is Janette Heckert. I'm in Utah. I'm with the anarchy range HMA. Stop the use of helicopters in all western states that impact the health and welfare of wild

horses and burros. The comprehensive Animal Welfare Policy designed by the BLM added protocol into their roundup contracts called Standard Operating Procedures, placed into the environmental assessment to comply with legal mandates. The BLM definition of comprehensive animal welfare has words like, "Must, unacceptable, prohibited, unlikely, uncontrollable." I use the words unacceptable and prohibited in describing the use of helicopters in roundups. These words are weekly and covertly applied to wild horse and burros during roundups and the quoted standard definition of care of wild horses and burros. Here are some words left out of the policy: fear, death, separation. Fear is in every horse that has been rounded up by helicopters. When they hear the sounds they start to panic. Horses remember. It remains with them forever. They are mentally altered for life. A fatigued horse chased for miles is likely to stumble, suffer tendon damage, pushed beyond the point of fatigue, developing conditions of colic, uncontrollable pain, continuous muscle contractions, not laminitis, and heat exhaustion. How does consequential damage apply to comprehensive animal welfare? It is a method the plaintiff against the BLM and helicopter pilots for harm done because of their actions.

MARK BOSHELL: this is Mark Boshell with the Division of Public Lands Policy Coordinating Office with the Department of Natural Resources here in Utah. Thanks for this opportunity. Up to this point, I couldn't disagree more with some of the comments that I've heard today. The study Utah greatly appreciates this opportunity to comment, and this issue carries serious and long-term implications for public lands here in Utah and throughout the west. When the United States Congress passed the Wild Free-Roaming Horses and Burros Act of 1971, it declared these animals to be living symbols of the historic and pioneer spirit of the West. Congress then mandated that horses and burros be managed as an integral part of the natural system of public lands. Although this declaration of policy is clear, the specifics as to how to preserve and maintain a thriving natural ecological balance is more complicated. Reasonable minds can disagree on how to achieve thriving range lands in concert with other uses of public lands such as livestock grazing. What seems to be indisputable is the basic and fundamental need for active, sustained, and sometimes creative management. Motorized vehicle use is critical to the BLM's success of managing healthy herds on healthy range lands. Without the use of helicopters assisting in gathering horses and burros, the cost of the wild horse and burro program would skyrocket while the effectiveness of removals would plummet. Helicopter gathers are the only effective way to gather horses in the remote and inaccessible HMAs throughout the west. If we care about the whole range and not just our famous and accessible HMAs, often located near population centers, we must continue the use of helicopter gathers. Contrary to what some may say about helicopter gathers, mortality rates for alternative gathering techniques such as water traps are higher than mortality rates for helicopter assisted gathers. The State of Utah resource management plan supports managing wild horses and burros to AML in an efficient and humane manner. The current BLM gathering techniques meet that standard, please-

JACKIE OLIVER: Hi, my name's Jackie Oliveri. I'm from New York. I am commenting today as an American taxpayer as well as a core team member of Advocates for Wild Equine Lobby Coalition. I would like to know why reports to your agency from Wild Horse Education of Comprehensive Animal Welfare Policy violations go unheard. Every single roundup where observers attend to document helicopter roundups, there are violations to the comprehensive Animal Welfare Policy, and reported to your agency and nothing is ever done. And nothing ever changes, it just gets worse. What is the purpose of the comprehensive Animal Welfare Policy if none of it is enforced? I am sick of taxpayer dollars, 500

to \$800 per wild horse captured, lining in the pockets of these helicopter pilots to torture and abuse America's wild horses. If helicopter roundups are supposedly humane, then why are horses chased while aborting their foals, collapsing from exhaustion, and dying after they enter the holding pens? Why are foals left behind or breaking legs trying to keep up? Why are horses being maimed by helicopters running them into barbed wire fencing? It's time for the BLM to uphold their legal responsibility to hold actual hearings where public concerns are actually heard, and working on maintaining compliance with the mandates to manage wild horses and burros humanely. The motorized vehicle hearings were supposed to create the venue to address abuses. Wild horse education never should have had to litigate to get a policy if these hearings were run as real hearings. BLM created the comprehensive Animal Welfare Policy to comply with law. BLM is failing in oversight and therefore I do not support the use of motorized vehicles. Helicopter roundups are straight up taxpayer funded animal cruelty, and we the taxpayers say no more. Thank you.

LINDA MCGUFFIN: Hello, my name is Linda McGuffin. I reside on the East Coast of the US. I am an advocate for our wild horses and burros. I am thankful for this opportunity to speak in opposition of the helicopter roundups. Our wild horses are chased by the Bureau of Land Management contracted helicopters for miles. The young foals are pushed to inhumane exertion, some falling under the panic rush of the herd. Many horses suffer unnecessary injuries and death, a wretched scene that plays in my mind every day. I strongly oppose our tax dollars paying for the helicopter roundups. Our iconic horses deserve more respect. The voice of the US citizens need to be considered. So many of us are insisting that the helicopter roundup stop and the wild horses stay on our public land. I have many more examples of inhumane helicopter incidents, but to remain within my two-minute comment, I will have to save them for another time. I wish peace upon the thousands and thousands of acres that our wild ones call home. This concludes my comments on the helicopter roundups. However, I do have a few seconds, so I want to thank everyone for sharing their strong comments and knowledge. I hope that the Bureau of Land Management takes heed to these comments and requests. Thank you.

HEATHER HELLYER: Hi, my name is Heather Hellyer, I am with Save Our Wild Horses. As a tax paying citizen with an interest in the welfare of our federally protected wild horses and burros, as someone who has attended a wild horse roundup in person at the Cedar City HMA just last year, I request and demand that the BLM supply the American public with a real hearing on this particular issue as intended by law. Last year, I watched the helicopter pilot chase the Cedar City wild horses for way too long, causing a foal to become separated from the rest of its band, sweaty horses standing who were too exhausted to run anymore and the helicopter get way too close to a band who refused to enter the track. Watching videos of other roundups over the years, I am tired of watching the same treatment of our wild horses year after year after year, with BLM using helicopters to chase horses in high heat and over rough terrain for miles. In addition, any use of ATVs or OHVs should be highly prohibited in wild horse areas. I have seen how easily wild horse is frightened at the sound or sight of these noisy off-road vehicles, as the horses are often chased by them in various HMAs by recreational users. This places foals in danger of frightened stampeding bands, and a foal in Wyoming was in recent years killed by these actions of ATV's users. Hearings, such as these are meant to address our valid concerns as American taxpayers, not to give permission for the repetitive lawlessness of BLM actions. Thank you for your time today.

TAMMY JONES: I'm in Idaho and we are seeing the first roundup in a long time. And I've met with Chris Robbins and Raul and a bunch of the people at BLM. And while I will say that I think that our members of RBLM really do care, and I do know that they are being careful about the contractor that they choose, I would still like to say that I've seen them spook lots of times and I just know that that happens. And I know that running them across our desert isn't a good thing. So I would really like to just say that I would like to see a much larger use of the hay and water bait. And I also know that there are an awful lot of cattle out there, I see them every time I go out. And I know that that's one of the reasons why the AMLs are so low. And I know that the AMLs have not been adjusted for decades, so I would really like to see that happen. And I would also challenge you at the BLM to let me know what difference it makes for those of us to come and testify like this? Because I've testified before the legislature a lot of times about a lot of different issues, I've helped write legislation, and I just don't see a lot of response from public testimony like this. So I would really like to see at least an acknowledgement and maybe something being done about the concerns that are being raised by the citizens that are testifying. And with that, I would like to say thank you for giving us this opportunity.

JUDY MOSSMAN: Hi, I'm Judy Mossman. I happen to live in the eastern part of our country. I am an advocate for the wild horses and burros. We don't have too many here, but I follow. And I'm really adamantly against helicopter use for these animals as we've seen videos and clips of the animals being run, as previously reported, overground and stone and fences and Lordy knows what else. And we have foals separated from their mothers, broken legs, horses dying and the reports come out so many were rounded up. And then we have a little death report after that, which is kind of sickening for the most part. So I am against helicopters. That must be a terrifying thing for all the wild horses and burros to have this thing over their heads real close and loud and noisy and pushing them to places that they really aren't comfortable running. And I just think that we need to find a better way to do this if we absolutely need to round these horses up that are just minding their own business and then they get pushed into small corrals, and some of them end up [inaudible 01:10:39] the slaughter. And this is not what was supposed to be happening. So it's cruel and unacceptable. And I think that's all I have to say, and I thank you.

CHARLOTTE ROWE: My name is Charlotte Rowe, I'm speaking as a wild horse and burro, a doctor, a retired diplomat, and a science advisor to the Cloud Foundation. The BLM's program of removing massive numbers of wild horses and burros from their legally designated habitat via helicopter greatly harms the welfare of the very wild animals that the Bureau is legally mandated to protect from quote harassment and death unquote, as stated in the 1971 Wild Horse Act. It wastes taxpayers monies, we're forced to pay helicopter contractors millions of dollars for work that is so irresponsible. The roundup and remove approach is counterproductive. The National Academy of Science is, in its report on the BLM's Wild Horse and Burro program, said it creates the phenomenon called compensatory reproduction. It's terrible for wild horses and in particular, as Lori Ford mentioned, helicopter roundups are extremely stressful for wild burros. They freeze when they're faced, when with these clattering sky machines... They're often subject to brutal measures such as roping or electric cattle prods to corral them. The stress, as she mentioned, can awaken dormant pathogens. Pathogens that often leads to deadly systemic reactions. I know from one of the burros I adopted. The BLM can't continue ignoring public protest about egregious violations of wild horse and burro welfare, many of which were mentioned by previous commentators and I thank them for their examples. These valid concerns must be addressed. A genuine

hearing on motorized vehicles requires making public the issues and concerns raised by concerned citizens.

LYNN ANDERSON: Okay. I think ranchers should be made to purchase or rent private land on which they graze their cattle. Or at a minimum, ranchers should be made to pay the going rate and not have taxpayers subsidizing their grazing costs. They should pay also for the environmental damage that they cause to public lands. I think that BLM commits one egregious violation on top of the next to both wild horses and to taxpayers. Ranchers are subsidized to graze on taxpayer land at far below market rates, where cows and sheep do enormous environmental damage to wild grasses and watering holes and then taxpayers have to pay to clean them up. Beautiful, innocent wild horses are rounded up in an unconscionably cruel fashion, killing far too many because the BLM fails to meet even its own abysmal standards in regards to temperature restrictions and the use of barbed wire. I think this needs to be stopped. I think citizens are outraged, and the BLM needs to start acting as though they hear the people who are paying their salaries. All right, thank you for your time.

VICTORIA WILLIAMS: Hello, I'm speaking as a taxpayer and a very concerned citizen for the welfare of our wild burros and horses. And I've been following along the whole process that's been going on for at least three or four years now. And the cruelty of the roundups is beyond comprehension, even though so many people have spoken out against it. And it's very well known that there are so many issues with using these motorized vehicles to chase and terrorize our wild horses and burros, often causing death and definitely whatever horses that will survive such a thing will be traumatized for life. I would really encourage you to please heed the concerns of the citizens and do what you can to make any roundups that have to occur, be done in a humane manner that does not involve the destruction and the killing and the just horrible treatment of our wild horses and burros. Thank you for allowing me to make comments

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

The following 18 participants registered to provide public comment, but were not in attendance:

Rick Carkidge

Anne McKinney

Deborah Clemente

Sherry Collisi

Jennifer Valentine

Sherry Milo, Melissa Pierce

Susan Morse

Bonnie Blonstein

Zanna Achivera

Sherry Pritchett

Barbara Depmen

Amy Lagrone

Candy DeCarlo

Melissa Warfield

Nina Perino

Vicky Pardi

Liz Rye

Elizabeth Zarkos

Pamela Wilmoth

Linda Pasco

Written Public Comment