

## Comprehensive Animal Welfare Program Team Assessment Report

May 24, 2022

**Off-Range Corral:** Canon City Off-Range Corral

**State:** Colorado

**Facility Manager or COR:** Steve Leonard, Facility Manager and COR

**CAWP Assessment Team Members:** Jerrie Bertola, Dr. Al Kane, Doug Satoca and Rob Sharp

**Assessment Dates:** May 20, 2022

**Total Number of CAWP Off-Range Corral Standards:** 117

**Number of Applicable CAWP Standards:** 75

**Compliance with Applicable CAWP Standards:** 62/75 = 83%

**General Notes and Comments from the CAWP Team:** Assessments of Off-Range Corrals includes the Comprehensive Animal Welfare Program standards for Off-Range Corrals and Transportation as applicable.

This CAWP Team Assessment was completed at the request of BLM Colorado. The assessment was completed in the same manner as regularly scheduled CAWP Team Assessments.

Coordination, access, and reception at the Canon City Off-Range Corral was excellent from both BLM and Colorado Department of Corrections (DOC) staff and inmates. The ability to see and access the entire facility and answer questions was good. During the assessment period, the CAWP team observed hoof trimming of wild horses.

The employees and staff that are working in this facility are well trained and knowledgeable working with and caring for wild horses; however, this facility is understaffed in multiple capacities including BLM, Colorado Department of Corrections, and inmate work force. The staffing shortages are affecting facility maintenance as well as the preparation, vaccination, and hoof maintenance of animals at the facility.

The layout and physical design of the corrals is exceptional, well thought out and highly functional. The chute systems and surrounding work areas were clean and well maintained.

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

- All state, district, and field offices will continue to comply with the WHB CAWP policy within their jurisdictions at all times. This includes the CAWP Standards for Off-Range Corral Facilities, Transportation, and Adoption/Sale Events.
- All personnel, including contractor and partners involved in the care, handling, and transportation of wild horses and burros at off-range corrals and adoption/sale events are required to complete training annually.

It should be noted that despite the challenge of restricted internet use at the prison, all persons working at the facility, including inmates, were confirmed to have completed the required CAWP training.

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

#### **Facility Personnel**

##### **Standard**

**1.I.B** The facility must have employees with training, skills, and experience to observe, move, and handle the WH&Bs on the facility. (major)

**Non-Compliance:** While the BLM and contract employees working at the facility have the training, skills, and experience to observe, move, and handle the wild horses at the facility, they simply do not have enough employees on a consistent daily basis to complete all the work required in a timely manner.

##### **Standard**

**1.I.C** The facility must have personnel that can properly maintain the working chute systems and facility infrastructure to provide for the safe housing, movement, and processing of the WH&Bs. (major)

**Non-Compliance:** During the assessment it was noted that some facility maintenance had been done recently, but it was also obvious that there had not been a consistent number of personnel available over at least the past year to keep up with general wear and tear, leaving the existing infrastructure with maintenance deficiencies.

##### **Standard**

**1.I.D** The facility should be staffed by appropriate office staff for record maintenance and recording. (minor)

**Non-Compliance:** There was missing information and discrepancies between the DOC database used to track animals and animal health and BLM's Wild Horse and Burro Program System. It is apparent the facility is not staffed adequately for accurate and timely data entry and records maintenance.

#### **Facility Design**

##### **Standard**

**1.II.E** Facility fences, gates, alleys, tubs, and working chutes must be constructed of stout materials and must be maintained in proper working condition. (major)

**Non-Compliance:** Several gates were sprung and did not close properly, creating a hazard where horses could get caught or injured between the gate and the post.

## **Standard**

- 1.II.F** Fences in pens, alleys, and working chute systems must be not less than 6 feet high for horses, 5 feet high for burros, and the bottom rail must not be more than 12 inches from ground level. (major)

**Non-Compliance:** There were multiple locations where the bottom rail was missing as well as locations where the bottom of the fence was greater than 12 inches off the ground. There were numerous places where the top of the fence was less than 6 feet high on both the north and south sides of the facility. In several of the pens, the dirt buildup also was attributing to the fence height being shorter than 6-feet high. Numerous places gates were off the ground more than 12 inches.

## **Standard**

- 1.II.G** Fences must be of stout design and be maintained in proper condition with no holes, gaps, or sharp edges which could result in WH&Bs being injured. (major)

**Non-Compliance:** There were several locations where welds on clips were broken and where the sheet metal was no longer tacked to the pipes. In one of the main alleys, extra panels and fencing stored in an adjacent area were laying against the fence with the ends of the panels protruding into the alley, creating the possibility of injury to the animals as they passed by. Sharp edges were noted on some of the gates covered with metal sheeting as well as on broken panel clips.

## **Standard**

- 1.II.N** Shelter structures should be designed or constructed to reduce the risk for injury of the WH&Bs and maintained to avoid excessive manure and mud. (minor)

**Non-Compliance:** In one of the pens with a shelter, a support post had been broken and was not braced to the ground such that the post was dangling, and the roof was only partially supported.

## **Loading and Unloading Facilities**

### **Standard**

- 1.III.A.3** There must be no holes, gaps or openings, protruding surfaces, or sharp edges present in fence panels or other structures that may cause escape or possible injury. (major)

**Non-Compliance:** The stock trailer loading area along the alley had gaps greater than 12 inches between rails and a missing bottom rail that could cause escape or possible injury.

## **Receiving Procedures**

### **Standard**

- 1.III.B.10** WH&Bs should be penned with WH&Bs of like age, sex, and temperament. (minor)

**Non-Compliance:** There were stallions that had accidentally become mixed with mares in the northwest pens, and there were also adults and juveniles of mixed sexes in another pen on the south side.

## **Preparation Procedures**

### **Standard**

- 1.IV.D.2** Facilities must conduct Equine Infectious Anemia (EIA) testing and apply freeze-marks within 30 days of receiving WH&Bs, unless directed by the facility veterinarian when age or physical condition requires a delay. (major)

**Non-Compliance:** EIA testing and freeze marking has not always been completed within 30 days. The delays appear to be a combination of management and staffing issues, such as the prioritization of other tasks (preparation of Sand Wash Basin horses) over more long-standing needs (West Douglas horses).

### **Standard**

- 1.IV.D.6** Facilities must adhere to the current BLM vaccination policy. (major)

**Non-Compliance:** Among animals received from gather operations as well as those that had been at the facility for some time, current and timely vaccinations had not been maintained in several instances. This appeared to be for several reasons as described above as well as the attempt to accommodate unusually high-strung animals received from a gather (West Douglas).

### **Standard**

- 1.IV.D.8** Hoof trimming must be performed twice per year at minimum or as necessary to maintain hooves in a proper condition. (major)

**Non-Compliance:** Numerous pens had horses with long hooves that were not maintained in proper condition. Examination of the records available confirmed it had been more than 6 months since the hooves of some animals had been trimmed.

## **Euthanasia Procedures**

### **Standard**

- 1.IV.E.3** An authorized, properly trained, and experienced person, as well as euthanasia equipment and supplies, must be available at off-range corral facilities in the event that the emergency euthanasia of an animal is required. (major)

**Non-Compliance:** Due to limitations associated with the location of the facility inside a prison, use of a firearm is prohibited. All euthanasia is done by injection by one of the contract

veterinarians. There are not authorized and properly trained persons available on-site at all times in case of an emergency.

**Table 1: Standards and Overall Assessment Rating**

<b>CAWP Standards and Policy Requirements</b>	<b>Compliant</b>	<b>Partially Compliant</b>	<b>Non-Compliant</b>	<b>N/A</b>
<b>CAWP Trained BLM Staff</b>	✓			
<b>CAWP Contract Trained Staff</b>	✓			
<b>Facility Personnel</b>		✓		
<b>Facility Design</b>		✓		
<b>Loading and Unloading Facilities</b>		✓		
<b>Receiving Procedures</b>		✓		
<b>Veterinarian</b>	✓			
<b>Biosecurity</b>	✓			
<b>Feed and Water</b>	✓			
<b>Preparation Procedures</b>		✓		
<b>Euthanasia Procedures</b>		✓		
<b>Carcass Disposal</b>	✓			
<b>Willful Acts of Abuse</b>	✓			
<b>General Handling</b>	✓			
<b>Handling Aids</b>	✓			
<b>Care of WHBs During Transport Preparation Procedures</b>				✓
<b>Vehicles</b>				✓
<b>Transport Procedures</b>				✓
<i>Compliant – all the activities were compliant with the standards or policy requirements. Partially compliant – one or more of the activities were non-compliant with the standards or policy requirements. Non-Compliant – all standards were non-compliant with the standards or policy requirements. N/A – not applicable, standards that were not observed during an assessment.</i>				

By request, the CAWP Assessment team provides the following recommendations to improve compliance at the facility.

It is the recommendation of the CAWP Assessment Team that the alley/chute used for loading stock trailers be torn out, redesigned, and rebuilt with sturdy panels including some with solid sheeting, rather than repaired.

While relying on veterinarians to perform euthanasia may be timely in some circumstances, the nature of working with large numbers of ungentled wild horses and burros requires enhanced preparation to provide for the euthanasia of animals in a timely manner. It is therefore recommended that BLM Colorado increase the number or personnel trained, properly

equipped with firearms, and authorized to perform euthanasia when needed in a manner similar to other states. This may include but not be limited to the ability to trailer animals needing euthanasia off site where it may be performed by a properly trained and equipped person(s).

It is apparent that more personnel are needed on site for the handling and working of animals in a timely manner. Additional BLM wrangler positions and possibly DOC wrangler positions should be considered. If the availability of inmate workers continues to be unpredictable and limited, it may be beneficial to consider contracting for such tasks as hoof trimming, feeding or facility maintenance.

Finally, while it has always been apparent there are many benefits to BLM and correctional industries working together to house and care for wild horses and burros, there are also increased challenges associated with these contractual arrangements. The CAWP Assessment Team believes the care provided to wild horses and burros housed at the Canon City facility is COMPLIANT with the BLM CAWP standards for Off Range Corrals, however, we also believe a review of the roles and responsibilities outlined in the contract as well as improved communication between BLM and DOC at every level would benefit the timely delivery of animal care and improve maintenance at the facility.

**Final CAWP Assessment Rating:** Complies. 83% of applicable CAWP standards were met.