A Review of Conditions at the BLM's Salt Lake Wild Horse and Burro Center April 2011 Including: A Video (March 15, 2011) and Complaint Reported on the Cloud Foundation Web Site April 9, 2011

Prepared by: BLM Review Team **April 20, 2011**

Review Purpose and Scope

This is a review of the corral conditions and animal care at the BLM's Salt Lake Wild Horse & Burro Center (the Center) near Butterfield Canyon in Herriman, Utah. This review was prompted by a video and complaint posted on You-Tube (http://www.youtube.com/watch?v=emB9LjHLltY last accessed April 14, 2011) and the Cloud Foundation web site (http://www.thecloudfoundation.org/). The video (taken on March 15, 2011) documented muddy conditions at the facility, and a report released by the Cloud Foundation on April 9, 2011 alleged abuse of wild horses and burros under BLM's care. This review was conducted at the request of Utah BLM's Associated State Director, Mr. Jeff Rawson. The review includes the following elements: 1) an assessment of conditions at the Corrals on Wednesday, April 13, 2011; 2) a summary of interviews with animal control, humane and code enforcement officials and persons who have visited the corrals recently and are generally familiar with operations at the Corrals; 3) a summary of interviews with BLM personnel present at the Corrals on March 15, 2011; 4) a review of the report posted on the Cloud Foundation web site; 5) a summary of the review and 6) recommendations from the Review Team (the Team, see below).

The Salt Lake Wild Horse and Burro Adoption Center was established in 1995 as an adoption and preparation center where wild horses and burros could be prepared for adoption, sale or transfer to long-term pastures. At that time the facility was intended for seasonal use during the summer and fall months. For the last several years the facility has been operating year round. The Center is located near Herriman, Utah on the east slope of the Oquirrh Mountains about 30 minutes from Salt Lake City. The Center covers approximately 20 acres which includes corrals, working pens and chutes, office space, public restrooms and hay storage barns. The facility is located on a large hillside and the larger pens include steep sections rising some 100 feet in elevation from bottom to top. The Center is currently staffed by 4 employees whose duties include feeding and care of the horses, cleaning and maintenance of the facility, on site and satellite adoptions, hosting public visitors and tours, and off-site post-adoption compliance inspections as well as monitoring and assessment of field conditions in Herd Management Areas west of Salt Lake City. The facility has been very popular in the Salt Lake City area and hosts about 800 visitors a month in the summer. Management of water runoff, mud and manure at the facility has been a challenge in the past, and late winter and spring are recognized as the hardest time of the year to address these issues at the Center.

Items reviewed by the Team included, in order:

- two and one half minutes of You-Tube video titled "Lisa Anne Friday report: Butterfield short-term holding facility outside Salt Lake City, UT March 15, 2011" and narrated by Ms. Ginger Kathrens
- a review of the written report titled "From Lisa Anne Friday" posted on the Cloud Foundation web site April 9, 2011

- a visit in-person to the Center on April 13, 2011
- interviews with officials and persons (described below) familiar with the operation of the facility who had visited the facility sometime between March 1 and April 12, 2011.
- interviews with BLM employees who work at the Center
- a partial interview with the author of the report posted on the internet

Additional video was apparently taken by the author of the report on March 15 but BLM was unable to obtain that unedited video footage. The author of the report initially declined to speak with the Team, then agreed provided she could have a witness to the conversation, then ended the interview abruptly after the first few questions seeking clarification of her observations on March 15. She stated her report would stand on its own, requested the Team forward questions to her by email but did not provide an address before hanging up.

Methods

The review team was established by Lili Thomas, Acting Deputy Division Chief, BLM Wild Horse and Burro Program (WHB) at the request of Jeff Rawson, Deputy State Director BLM Utah. The team consisted of Lili Thomas, WH&B Specialist, WH&B National Program Office, Reno, NV; Dr. Albert J. Kane, Senior Staff Veterinarian, USDA Animal and Plant Health Inspection Service (APHIS), APHIS/BLM WHB Partnership, Ft Collins, CO; Joe Stratton, Facility Manager, Elm Creek WH&B Facility, Elm Creek, NE and Dr. Earl Rogers, Utah State Veterinarian (retired), Salt Lake City, UT. The entire team visited the Center on April 13, 2011.

The team conducted in-person interviews with 6 officials or persons who visited the facility between March 1, 2011 and April 12, 2011 either on routine business or in response to the same allegations under review here. These included an Animal Control Officer serving Salt Lake County, a Code Enforcement Officer with the City of Herriman, the Chief Investigator with the Humane Society of Utah, a Brand Inspector with the Utah Department of Agriculture and two private veterinarians who provide veterinary care at the Center. BLM employees who were interviewed included 3 wranglers who were present on March 15 and the Facility Manager.

Assessment and Discussion: Team Visit to the Center April 13, 2011

<u>Condition of the Pens, Drainage and Mud</u>

On arrival at the facility it was apparent there had been considerable rainfall recently. Banks along the road entering the facility had been stabilized with landscape fabric and water retention ponds were full or showed evidence of having been pumped recently. The day of our visit was relatively dry, but there was evidence of muddy conditions immediately apparent in the driveway and parking areas. Similarly there were significant muddy areas in almost every pen.

The entire site is a hillside of variable steepness and the lower portions of which are slightly less steep. Larger pens at the top end of the facility include a very steep hillside that spans all 3 large pens. The lower portion of these pens is less steep. Hay feeders are located in this lower area of the larger pens adjacent to mounds constructed of dirt and compacted manure. These mounds can provide dry areas for animals to lie down. This is a standard practice in confined large animal facilities and can be an effective solution to poorly drained areas during periods of snow melt or

high rainfall. Below the upper pens is an alley used for moving animals and access by heavy equipment used for feeding. Previous attempts to channel runoff using drains and cement curb and gutter systems in the alley at times resulted in ice accumulation and dangerous footing for the animals. A portion of the curb and gutter remains on the south end of the alley which is an area not used to move horses between pens.

Figure 1. Remaining curb and gutter system used to collect and direct water runoff away from pens below the south end of the equipment alley.

Below this alley are additional holding pens as well as a solid sided pen used to work animals during sorting and where animals are anesthetized for castration as well as a series of smaller pens used for sorting, showing smaller groups of animals to adopters when requested or separating animals that may need extra feed or are awaiting preparation for adoption. New arrivals are usually held in these smaller pens until after they receive booster vaccinations to facilitate movement within the facility and provide some degree of separation from animals that have been in holding for some time, usually several months. There is also a series of small pens across from the office on the east side of the roadway. These pens were originally constructed as sick pens but reconfiguration of the roadway cut off access to the chute and alleyways so they are primarily used for holding saddle horses, including some gentled wild horses, which are used to move horses within the facility.

Water from the upper pens runs down hill to lower areas. Some of the feeders are located in the middle of the pen but others are located on the periphery for easier access by tractors used for feeding. Runoff and high traffic combine to exacerbate muddy conditions in the lower portion of the large pens including the feed areas. Mud and manure also tend to accumulate along the lower sections of the pens. The alleyways provide separation from the horses so observers have a safe viewing area that does not disturb the horses. The perspective from this location is up close to the most poorly drained areas of the larger pens.

Figure 2. A poorly drained area of an upper pen where mud has built up in a high traffic area.

The team observed the pen where the You Tube video was taken and found it to be very steep in the upper sections and muddy with large mounds of dirt and manure piled up. Horses were around the feeders and the area was muddy. Most horses were standing, eating hay or moving about in response to our presence. A few horses were seen lying down in drier areas were hay had accumulated next to the feeders. The top of the pen did look drier than the feeding area and the bottom part of the pen. Each pen showed evidence of measures taken to direct runoff out of the pen and mounds constructed to provide drier areas for horses to rest. In some pens these were still functional. In others it was clear they had been eroded or broken down over the winter and were no longer effective. A large area in Pen A, where the pregnant mares were kept, was strewn with straw to provide drier and cleaner areas for foals and mares to lie down.

Figure 3. Area of the mare pen where straw bedding is laid down to provide a drier and cleaner area for mares and foals to rest. This area is not visible from the drover's alley that is accessible to unescorted public visitors.

When the team looked at the entire facility it was found that most of the lower pens also had either deep mud or evidence of past accumulations of mud. The burro pen and the pen closest to the hay barn were exceptions as these pens were mostly dry and free of mud. Areas near the hay feeders were the wettest, and there were other areas where straw had been spread in the past to provide drier areas in these pens.

The Center has always struggled with controlling drainage and a lot of mud during the spring. This spring has been exceptionally wet in the Salt Lake Valley where the facility is located. At this time of year and in this region one could expect high traffic areas near feeders, water tanks and droving or equipment alleys to be very muddy. While muddy conditions at certain times of year and in certain areas of a pen are not of themselves surprising or alarming, it is important that large animals including horses have access to areas free of mud or standing water to lie down and rest. Despite the best intentions and efforts of the employees at the Center, it is the opinion of this review team that the weather conditions this spring and poor drainage have created this situation where many animals do not have access to sufficient areas to lie down in many of the pens at the Center in the recent past and at the present time.

Availability of Feed, Mineral and Water

All horses in the Center were being fed free choice hay in large bale feeders. Most horses were being fed alfalfa hay. Those that were recently gathered from the Antelope complex were started on grass hay, some were still making the transition to alfalfa, and others had already been moved to alfalfa. This is a fairly common practice at BLM facilities to allow horses to transition from range forage to grass hay then to alfalfa hay over a period of time. Alfalfa ultimately provides the energy needed to put weight on wild horses under group housing conditions at the lowest cost and allows BLM to provide a consistent type of forage across facilities so horses do not have to make repeated feed changes between potentially different types of grass hay when they move between facilities. Some large bale feeders were empty at the time of our visit because the mud prevented tractors from getting to the feeders. Each pen however had more than one hay feeder in it that was filled with hay each day, was accessible to the horses and still had a large amount of hay in it at the time of our visit. There were several empty feeders hanging on panels that were no longer being used since the facility switched from feeding small bales to feeding large bales.

Equine protein/mineral tubs are routinely used as a feed supplement at the Center for foaling mares and thin horses. These tubs were present in the mare pen at the time of our visit but were only visible if one walked over a small ridge inside the pen, near the area where the dry bedding had also been provided. All natural trace mineral blocks are normally provided to the horses in feeders or salt boxes inside the pens. At the time of our visit some pens had protein/mineral tubs or salt being provided, and others did not. Recent heavy rainfall had made it difficult to keep the salt boxes accessible to the horses in a few of the pens. It has been the practice of the facility to remove the salt boxes from some pens during the worst periods of rain and mud buildup and replace them as the pens dry up.

All pens had automatic water tanks or troughs. The areas around the water tanks were well engineered for drainage and water was easily accessible for all the horses.

Overall Condition of Animals

At the time of our visit there were 461 horses in the facility. The body condition of over 90% of the animals at the facility was very good at the time of our visit. No signs of illness or infectious disease were noted during our visit. Most animals had a Henneke body condition score of 4 (4 is moderately thin) to 6 (6 is moderately fleshy). There were a few mares or stallions in each pen whose body conditions were still in the 3 (thin) to 4 (moderately thin) range. No animals were seen with a condition less than 3. There was a group of smaller young stallions and yearlings from recent gathers in one of the lower pens. They had been separated due to being thinner than the majority, and they were being provided free choice grass hay and making the transition onto alfalfa. Most had put on weight and the thinnest horse in this group had a body condition score of 3. This pen included several horses whose tails had been chewed short by other horses despite having free choice access to hay at all times.

Section Summary

It is clear to the review team that recent rainfall that has been 150 to 200% of average has overwhelmed the soils and drainage capacity of the facility. While brief periods of mud formation in pens may be unavoidable in some areas, it is important that a majority of animals have a place to stand or lie down without being in mud at any given time. Due to the location and surrounding terrain it has always been a challenge to avoid problems related to mud accumulation at the Center. Dirt and packed manure mounds are typically used to provide a dry place for animals to rest. This year these mounds have eroded beyond their useful capacity and the situation at this time needs to be addressed.

Receiving additional horses from the Antelope gather during February 2011 exacerbated the situation at the Center, requiring that almost all pens be used at any given time and pushing the seasonal capacity of the facility to its limits. Being unable to have a manure cleaning contract in place caused a backlog in movement of manure from the facility because of early weather patterns last fall and the many roles the staff must cover throughout the Center.

It is the recommendation of the Team that a sufficient number of horses be moved out of the facility as soon as possible so as to provide for the well-being of the horses. This immediate action should be structured to move a proportion of the animals to other nearby facilities that can accommodate additional horses. This should benefit those horses that are moved as well as relieve the pressure on the Center so some pens will not need to be used at all and only those pens that can provide rest areas free of standing water or mud are being used. The first candidates for movement of horses to other facilities should be horses that are fully vaccinated and show no signs or recent history of infectious respiratory disease. Relief, whether by moving horses to other facilities or to dry pens within the Center, should also be targeted to pregnant mares and horses with lower body condition scores.

Assessment and Discussion: Interviews with Officials and Veterinarians

Four local and state officials were interviewed during this review. The first, an animal control officer with 16 years of experience had visited the facility on April 11th after receiving complaints from the public who had viewed the You Tube video and read the report on the internet. This Officer was in the company of a second local Code Enforcement Officer from the town of Herriman. Their visit to the facility was unannounced and they were given complete

access to the facility. These Officers noted that they had received similar complaints about other private facilities in the area due to the unusually wet spring and conditions at the Center were typical of many large animal operations in the area at the present time. They remarked the staff seemed to be doing the best that could be done under the weather circumstances and terrain at the Center. They did not have concerns regarding inhumane treatment or animal abuse, and it was their conclusion that no code violations were present at the Center. The Chief Investigator for the Humane Society of Utah was the third official interviewed as he had also visited the facility on April 11th in response to out of state complaints received by email in response to the video and report on the internet. This Investigator has 38 years of experience in the field including training and experience investigating equine cruelty, abuse and neglect cases. It was his opinion that while conditions in the corrals were certainly not ideal due to the large amount of mud present, it was likely to be a short lived situation attributable to recent rainfall. He did not feel care or treatment of the animals at the Center was inhumane and saw no reason to advise local or state authorities that legal actions were warranted. He also reported that many large animal facilities in the area were in similar circumstances and this situation was not unusual in this region at this time of year. Finally, a Brand Inspector in the employment of the Department of Agriculture was the fourth Official interviewed as part of this review. She visits the facility on a fairly regular basis (a few times a month or at least monthly depending on BLM's shipping schedule). She also commented that given the location of the facility and the terrain she felt the staff was doing the best that could be done under the circumstances. She reported that many local private facilities were having problems with excessive water and mud in their corrals. She reported that at no time has she ever witnessed abusive or inhumane treatment of animals at the facility, and she shared that the staff truly cared for the animals with compassion and concern for their well being. When asked, each of these officials outlined the steps they would take if they were to witness inhumane treatment of animals at the facility. They noted it would be their duty to report such treatment if they witnessed it to BLM's upper management as well as to the legal authorities responsible to their agencies.

Two private veterinarians who provide service to the Center on an on-call basis were interviewed during this review. They have worked in this capacity for several years and are familiar with operations at the facility. Both agreed conditions at the facility were not ideal but felt the staff was doing the best they could given the location of the facility and the conditions of this particular spring. One of the veterinarians interviewed had examined and treated the buckskin horse seen in the video with the laceration on its shoulder during the days prior to March 15.

Assessment and Discussion: Review of Video and Report from the Internet

The Review Team contacted the author of the report on the internet on two occasions to clarify some of the items in the report and gather more information about her visit. She mentioned that she was accompanied by a companion during her visit. The Team asked if we could identify and contact this person for their thoughts on the visit but she refused to identify that person. She also declined to provide any additional video footage from her three hour visit to the facility. She would not comment on why she waited from March 15 to April 9 to release her report. She repeated that her report and the 2 ½ minute video stood on their own merits, and she said she felt like she was being interrogated rather than the Team asking about the horses. After a few questions and brief discussion she abruptly ended the telephone conversation with the Team.

To address the concerns, information and misinformation included in the report this section of the Review will individually address each of the subheadings used in the original report.

A. Vehicle Information

The team did not attempt verify the license plate numbers of vehicles in the parking lot nor were we able to ascertain any reason behind reporting vehicle license plate numbers, particularly those of privately owned vehicles. The trailers in the parking lot at the time of our visit showed minimal amounts of rust and all were found to be in serviceable condition.

B. Staff Personnel

As described above all the staff working at the facility on March 15, 2011 in addition to the Facility Manager were interviewed. It is unclear who "John" is; there is no one by that name who works at the facility. The staff described that they offered to show the visitors of March 15 around but the visitors declined and requested to look around on their own. There was some discussion of mud and needing better boots to walk around. At no time did anyone from BLM curse at the visitors. The staff tried to answer questions but noted that the questions were atypical of those usually asked by most adopters.

C. Overall Conditions

As described above there was certainly mud present, but at no time during our visit did we see horses struggling to walk through the mud, stumbling or falling against each other. A few horses were seen lying down where hay had overflowed the feeders or where straw had been laid out for bedding. A few horses were lying on the mounds or slope of the hillside. All horses got up and moved off freely at our approach. The largest area that is bedded with straw is along a reverse facing slope in the pregnant mare pen and is not visible from areas accessible to unescorted public. Had the author of the report requested to be shown around she could have been taken into that pen where she would have seen the bedded area. No video of horses unable to rise or struggling to get up was available for review. None of the staff, officials or veterinarians interviewed reported ever seeing horses struggling or unable to rise from a prone position.

Figure 4. Though many horses were resting or eating others responded to the Team's presence by moving about the pens freely and some were seen playing and running about.

D. Gather Areas

The team observed that most of the horses at the Center were solid colors with some paints. There were horses from several HMAs at the Center. The majority of animals had mud on their feet and lower legs. Many of the horses had some mud on their bodies. Some freeze brands were visible as were some neck tags. Some of the horses did have mud that would have covered the brands and some of the neck tags were not easily read.

E. Pen Information

The employees did ask their visitors on March 15 if they wanted any help with seeing the horses and they said no. The employees asked the author of the report what type of horses she was interested in adopting ie. mares, studs, young, older. She replied she was looking for a black and white stud that was gathered off the Antelope gathers this winter and that she wanted to look at all of them. The employees stated that they did not have a black and white stud from the Antelope gather. They did provide her with binoculars so she could more easily read tag numbers and better see the horses. This is a common practice that works well with most visitors.

On March 15 while the author of the report and her companion filmed and viewed the horses the wranglers were preparing horses to be shipped to long term pastures in the next few days. There were 503 horses at the facility on March 15. On April 13 there were 461 horses at the facility. Horses were being shipped out of the facility during March and April. As previously described the team observed that all the pens had hay in some of the feeders in each pen. Not all feeders were in use either because they were inaccessible due to mud or they were no longer being used since the switch from small bales to large bales. There was an adequate supply of hay available for the number of horses in each pen to have feed throughout the day. Some of the feeders did have rust on them, some were broken. The Center replaces broken feeders on an ongoing basis.

The pen containing horses with short tails was the pen assigned to horses that were thin and allowed better access to feed without competing with larger and more robust horses. At the time of our visit this was one of the drier pens at the Center. The short tails in this pen were due to one of the horses chewing on the other horse's tails. BLM does not typically cut horses tails when they get matted and no one at the facility recalled cutting any horse's tails or telling the author of the report they had cut horses' tails.

F. Feeding

The choice of alfalfa as a forage source of energy and protein was addressed above. It has not been BLM's experience that it causes stomach disorders. Mineral supplementation was addressed above. Protein/mineral or trace mineral supplements were available in most but not all pens at the time of our visit. When the current heavy rains subside salt boxes will again be placed on the ground where necessary.

G. Moving Horses

Typically the staff at the Center uses horses to move animals through the pens and alleyways. When the ground is muddy and frozen they move horses on foot. At no time does the Center use a "small bulldozer" to move horses. The Team was hoping the author of the report had video of this or that they could get clarification of this, but that seemed to be the question that precipitated her ending our discussion. There is a 4 wheel drive utility cart (like an agricultural golf cart)

made by “Bobcat” that the staff use to ride to the top of the hill or up the alleyways when moving horses. They then get out and move the horses on foot using flags. It is difficult to see how a small bulldozer would even be an effective aid to move horses given how slowly they move. The Center does also have a skid steer made by “Bobcat” but it gets stuck in the mud easily and would also not be an effective tool for moving horses. It is not used by anyone to move horses at the facility. The Team can only conclude that the author of the report did see the utility cart being used from a distance, heard it maneuvering through gates etc. and thought the staff was using it to drive horses from the pens to the alleyway.

Figure 5. Picture of the "Bobcat" brand utility cart used by staff to move around the Center. The cart is not used to chase horses.

H. Processing

As mentioned above horses were being prepared for shipment to long-term pastures on March 15. The “metal box” mentioned is a padded, hydraulic tilt chute similar to what is used in all BLM facilities to work horses and trim animals’ hooves. The tub and alley way leading to the chute is solid sided, the narrow parts are lined with rubber and plywood, the tilt chute is padded with thick 3-4 inch padding on the inside to prevent injury. The wranglers were trimming hooves that day to prepare animals for shipping. On March 15 they were using farrier nippers to trim the horse’s hooves. On some occasions they also use hoof knives, rasps and grinders with hoof trimming discs to trim hooves depending on the facility and needs of the job at hand. Some BLM employees are practicing farriers with formal training, other are trained to trim feet on the job.

I. Diseases

Horses at BLM facilities are variously segregated by gender, age and length of time since gathering. Newly gathered animals are held by group until they have been fully vaccinated. After that time they may still be kept together by HMA to some degree but over time horses that have been in the facility for a period of months are often mixed together. Sick animals or animals needing treatment may be separated at times into specific pens, but at times they are also kept together to slow or prevent the spread of disease between cohorts.

The Center had a strangles outbreak in October of this year. As in many confined facilities this type of infectious upper respiratory disease spreads easily through fences and across alleyways. Complete isolation is not possible and strangles most often spreads through a facility affecting the naïve animals until they build vaccinal and natural immunity. The Center does not have dedicated sick pens; they do try to keep horses that are sick together in groups according to their exposure and vaccination status as well as away from the general population to the extent possible. Injured horses and those requiring regular treatment are usually kept in smaller pens close to the working chutes.

J. Adoptions and Tenure

The Center follows the same adoption policies and procedures related to "three strikes" as any other facility. All horses are not necessarily sent to three adoptions. From the Center horses may also be sent to the prison training facility at Gunnison. As with any other BLM adoption facility horses are available for adoption when open to the public, usually at least a few days each week just as they were available to the author of the report during her visit. Horses that remain unadopted, particularly those over 5 years of age, are sent to long-term pastures as space allows.

Foals are currently being born at the Center. There was a foal that had been born at the Center on March 15. It was out of view of the visitors. At the time of our visit there were three foals in the heavy mare pen.

K. Transportation

As with all BLM facilities, small numbers of horses may be transported to and from the Center in gooseneck stock trailers. Larger numbers of horses are transported between facilities or to long-term pastures in straight, single-deck semi trailers. This type of transportation is usually provided under contract and the Center does not keep any of these types of trailers or trucks on site.

L. Vetting and Gelding Horses

A valium, ketamine and xylazine anesthetic combination is used for gelding at the Center. Gelding and test results for Equine Infectious Anemia are recorded in the BLM Wild Horse and Burro Program System as well as on each animal's health record. Veterinary services are available 24/7 on an on-call basis, and any staff member has the authority to call the veterinarian if needed. Animals are generally tested for EIA each year or prior to interstate movement as needed to comply with state regulations.

M. Injuries

There was a buckskin horse with a laceration on the left shoulder area on March 15. The injury had been examined and treated by a veterinarian a few days before the author of the report's visit. The blue discoloration around the wound was not bruising. It was a blue/purple wound disinfectant used on and around the wound. At the time of the Team's visit, April 13, the wound had healed nicely with only a small scar and granulation bed remaining at this time. A full recovery with very little scar showing is expected within the next few weeks.

Figure 6. April 13 picture of buckskin horse with the laceration seen on the internet video. The wound has healed well with only a small granulation bed and scar remaining at this time. A full recovery with little or no obvious scarring is expected.

N. Condition of the Horses

In general terms this has been addressed above. The particular mare in question (#6924) is in fact a three-year-old. The cause for her weight loss was unknown but thought to most likely be due to tooth eruption (shedding incisors, a molar or retained cap) causing a decrease in appetite or feed conversion efficiency. In the attached photograph it seems obvious the mare has put on 100-150 pounds or so and improved in body condition. Veterinarians on the Team who examined the mare assessed her body condition as a 3.5 on the Henneke scale of 1-9. That this was the only thin horse noted by the report's author out of about 500 on site at the time of her visit is evidenced by her comment that "most horses looked to be of good weight" and is a reflection of the good care and appropriate feeding program being provided at the Center.

Figure 7. Pictures of mare #6924 on April 13. Since March she has gained a significant amount of weight and is expected to continue improving in condition.

Overall Summary

The findings of the Review Team are as follows:

1. A spring characterized by unusually high rainfall along with local soil conditions and terrain have created an unacceptable situation at the facility with regard to mud accumulation in the pens. The Center was originally designed for summer and fall use. Since becoming a year round facility BLM has struggled with drainage and mud problems. At this time the situation has reached the point where it cannot be addressed without major changes in maintenance and the physical layout of the Center.

2. In many of the pens, the very muddy conditions have made it difficult or impossible for the majority of horses to find an area free of standing water or mud where they can lie down to rest. For short periods of a few days this may not have a serious negative impact on the horses. Horses can sleep standing up, but over time this situation can lead to increased stress and fatigue in the animals and it must be avoided over a longer period of time.

3. A few pens are unaffected, but most are affected to one degree or another. The additional horses brought to the Center from the Antelope gather created additional problems for the staff by requiring the use of almost every pen on site. This does not provide for relief from the muddy conditions by moving horses out of the pens that are most affected during the wettest winter and spring months.

4. While this year has been particularly bad, the problem of excessive mud at the Center is not new and has been a challenge for several years.

5. All persons interviewed agreed the staff at the Center were all caring and compassionate in their care and handling of the animals. All agreed they did not neglect the animals, were never abusive and they were doing the best job possible under the recent weather conditions in the region and the terrain and facilities available at the Center.

6. Past efforts to improve drainage and control mud at the Center have not worked. Portions of some earlier improvements proved to be dangerous for the horses (a concrete curb and gutter drainage system) and had to be removed from the drover's alleys where animals are moved from pen to pen.

7. The very muddy conditions have made it difficult or impossible to access all pens for cleaning and only pen cleaning and rebuilding dry mounds to provide rest areas will address the situation in some of the pens. Early winter weather, and increased workloads attributable to a reduction in staffing and the absence of a manure removal contract created an unfortunate situation where pens could not be cleaned ahead of the wet weather and manure accumulated and could not physically be moved from some areas.

8. The very muddy conditions have made it difficult to access all pens for feeding at all feeders. Through extra efforts to keep the accessible feeders full at all times, adequate feed has been provided despite these conditions. This is evidenced by the good body condition of all but a few horses. In most large groups of wild horses, particularly recently captured animals, a small percentage of thin horses would be expected. That only a few horses were noted as thin during the team's visit speaks to the extra effort being made to provide for the horses at the Center despite the unusually challenging conditions.

9. Similarly, the high rainfall and muddy conditions have prevented the facility from providing trace mineral salt in every pen. This is, however, a temporary situation that only affects a few pens and although not ideal it is very unlikely to cause problems over a short time of a few weeks, particularly when feeding high quality nutritional diets such as alfalfa.

10. The allegations that horses were having difficulty moving through the mud or were down and unable or having difficulty rising, were being herded or moved with a "small bulldozer", that horses tails were cut off, or that horses were being inappropriately worked in a "metal box" or not being provided with adequate veterinary care were found to be without foundation.

11. The facility is ideally located for good public exposure and has a very high rate of public visitation. The facility has one of the highest facility adoption numbers in the Program, and it would be unfortunate to lose this value for the public if the facility were to be closed.

12. The facility is not well located in terms of regional rainfall and terrain.

13. Recent personnel cuts at the facility hamper the staff's ability to receive and escort visitors without interrupting daily work activities. The decision to not fill behind a front desk employee who recently retired and a compliance officer who also retired and to have the facility manager keep off site horse specialist duties have pulled additional staff hours away from the facility.

14. The wranglers on site do their best to host visitors and answer questions but are likely acting outside the scope of their normal duties and comfort zone when faced with questions beyond those typical for adopters.

15. No violations of BLM policy or standard procedures were identified. No inhumane treatment or violations of existing animal care standards were noted by the Team or reported by Animal Control and Welfare authorities.

The recommendations of the Review Team are as follows:

1) ***For immediate implementation***– a large percentage of the animals at the facility should be shipped out to other nearby BLM facilities as soon as possible. This will allow for selective use of pens that are dry enough to allow a majority of animals in any given pen to lie down for rest in an area free of standing water or mud. (Note: a verbal recommendation to this affect was provided to management on Friday, April 15.)

2) The facility should be kept at a reduced capacity during the winter and early spring months until such time as the issues associated with poor drainage and excessive mud in the pens can be resolved.

3) An agricultural engineer familiar with large animal holding facilities should be brought in to evaluate the soil conditions, site, pen layout, construction and maintenance procedures to see if there is a long term solution to the issues with poor drainage and mud at the Center.

4) With regard to solutions that may or may not be identified in number 3 above – consideration should be given to either:
   a) make the facility seasonal and only hold horses during the months of limited regional precipitation; generally the late spring, summer, fall and early winter;
   b) keep the facility open year round but reduce the holding capacity of the facility at all times of the year, perhaps converting its primary purpose to that of an adoption showplace or visitor's center and WH&B educational center; or
   c) relocate the facility to another site within the Salt Lake City area

5) Regardless of where the facility may be located consideration should be given to the following:
   a) fill empty staff positions including a front desk person who's training and duties include public relations and receiving visitors to the Center;
   b) align all Utah facilities under one management to facilitate coordination, sharing of resources and improve efficiency;
   c) contract for pen cleaning , manure removal and other maintenance or construction projects so that staff can focus on animal care, preparation and adoption;
   d) build designated sick pens with increased shelter from the elements such as windbreaks; and
   e) assign a public relations officer to the Center to help with public visitors, media relations, information and educational programs for the WH&B Program.

6) Formalize a set of guidelines facility managers can use to assess their animal care needs and capacity on an ongoing basis as well as procedures they can follow to help correct welfare problems when they cannot meet their animal care goals.